

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL 32653-1500  
Telephone (352) 336-5600  
Fax (352) 336-6603



November 14, 2000

0037545

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

RECEIVED

NOV 20 2000

BUREAU OF AIR REGULATION

Attention: Mr. Jeff Koerner, P.E.

RE: OKEELANTA POWER COGENERATION FACILITY  
ARMS FACILITY ID NO. 0990332  
PROJECT NO. 09903320013-AC/PSD-FL-196L  
ADDITION OF NATURAL GAS AS A SUPPLEMENTAL FUEL

Dear Mr. Koerner:

Okeelanta Power Limited Partnership (OkPLP) has received the Department's letter dated October 10, 2000, requesting additional information in regards to the use of natural gas as an alternative fuel in its three (3) cogeneration boilers. Each of the Department's questions is responded to below, in the same order as they appear in the Department's letter.

1. The correct value is 0.028 lb/MMBtu, as shown in Table B of Golder's September 13, 2000 letter response. The individual worksheet for Boiler A was in error.
2. Use of CEM data for purposes of calculating actual annual emissions is much more representative than using a single stack test. A single stack test only represents emissions occurring on that particular day, whereas CEM data provide actual emissions (in lb/MMBtu) for each day of operation.

In Golder's September 13 letter to the Department, the current actual emissions in Table A for CO and NO<sub>x</sub> were derived by taking the annual average CEM data (in lb/MMBtu) times the annual heat input rate (in MMBtu/yr). However, this method is not necessarily accurate because it does not directly associate emission factors with specific heat inputs. A much more accurate method is to take the daily CEM data (in lb/MMBtu) times the daily heat input (in MMBtu/day) to obtain a daily pounds of emissions. The daily data can then be summed to obtain monthly and annual emissions.

OkPLP has daily data for CO and NO<sub>x</sub> which are presented in the form of monthly summaries in the attached three tables (one for each boiler). Due to the downtime this year for the installation of the mechanical dust collectors, the time period April 1999 through March 2000 was used as representative of normal boiler operation. This period is the latest 12-month consecutive period which is representative of normal boiler operation.

Only emissions of CO, NO<sub>x</sub>, PM, PM<sub>10</sub> and VOC are addressed in this response letter, since these are the only pollutants potentially affected by natural gas burning. The revised current actual CO and NO<sub>x</sub> emissions are shown in the attached Table A (revised). Derivation of the PM, PM<sub>10</sub> and VOC emissions are shown in Table B attached. The emission factors are the same as in the September 13 submittal; however, the total annual heat input for each boiler is slightly different due to the use of the April 1999 - March 2000 time period.

The revised future actual emissions that may potentially trigger PSD review, based on this analysis, are also shown in Table A. These future actual emissions do not include the affects of any emissions increases due to demand growth.

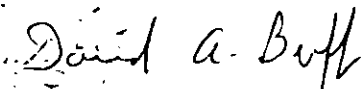
For purposes of calculating future actual CO and NO<sub>x</sub> emissions, OkPLP proposes this same methodology, i.e., using the daily average CEM data (in lb/MMBtu) and the daily heat input (in MMBtu) for each boiler to determine daily mass emissions. The daily emissions will be summed for each month of operation. Future actual emissions of PM, PM<sub>10</sub> and VOC will be calculated on the basis of stack test data and annual heat input rates for each boiler.

3. As stated in the September 13 response letter, OkPLP does not agree that the 60.44a(d)(2) provisions apply because Section 60.44a(d) applies only to those units for which modification or reconstruction commenced after July 9, 1997. The change OkPLP is proposing will not increase the emissions of NO<sub>x</sub> on a lb/hr basis, and therefore no modification will occur. However, OkPLP's current limit of 0.15 lb/MMBtu is equivalent to the revised NSPS.

Thank you for your consideration of this information. Please call if there are any questions.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/jkw

Enclosures

cc: Gus Cepero  
James Meriwether  
David Dee  
Bill Tarr

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*O. Krasnicko, SP*  
*O. Krasnicko, PBCMB*  
EPA  
NAS

GOLDER ASSOCIATES

Table A. Current Actual Emissions, Okeelanta Power L.P. (revised 11/14/00)

| Boiler   | Operating Hours <sup>a</sup> | Heat Input <sup>a</sup><br>(MMBtu/yr) | Annual Emissions (TPY) |                 |         |                  |       |
|--|------------------------------|---------------------------------------|------------------------|-----------------|---------|------------------|-------|
|  |                              |                                       | CO                     | NO <sub>x</sub> | PM      | PM <sub>10</sub> | VOC   |
| Boiler A   | 7,265                        | 3,824,398                             | 478.34                 | 272.22          | 395.6   | 42.2             | 12.1  |
| Boiler B   | 5,927                        | 3,206,304                             | 485.29                 | 220.20          | 161.2   | 27.5             | 19.6  |
| Boiler C   | 6,978                        | 3,694,714                             | 562.44                 | 261.14          | 560.0   | 65.4             | 12.5  |
| Total  | 20,170                       | 10,725,416                            | 1,526.07               | 753.56          | 1,116.8 | 135.1            | 44.2  |
| Permit Limit<br>(PSD-FL-196)   |                              | 11,500,000                            | 2,012.5                | 862.5           | 172.5   | 172.5            | 345.0 |
| PSD Significant Emission Rate  |                              |                                       | 100                    | 40              | 25      | 15               | 40    |
| Future Actual Emissions<br>which may trigger PSD Review <sup>b</sup> |                              |                                       | 1,626.1                | 793.6           | 172.5   | 150.1            | 84.2  |

<sup>a</sup> Based on the period April 1999 through March 2000.

<sup>b</sup> Where the current actual emissions plus PSD significant emission rate exceeds the current permit limit, the current permit limit is shown.

The future actual emissions do not include increased emissions due to demand growth.

Table B. Current Actual PM, PM10 and VOC Emissions for OkPLP Boilers

| Parameter                         | Boiler A |           |           | Boiler B  |        |           | Boiler C  |           |        |           |           |           |
|-----------------------------------|----------|-----------|-----------|-----------|--------|-----------|-----------|-----------|--------|-----------|-----------|-----------|
|                                   | PM       | PM10      | VOC       | PM        | PM10   | VOC       | PM        | PM10      | VOC    |           |           |           |
| <u>Emission Factor (lb/MMBtu)</u> |          |           |           |           |        |           |           |           |        |           |           |           |
| Wood waste(a)                     | 0.141    | 0.0188    | 0.004     | 0.081     | 0.0202 | 0.005     | 0.434     | 0.0548    | 0.008  |           |           |           |
| Bagasse (a)                       | 0.265    | 0.0248    | 0.008     | 0.123     | 0.0138 | 0.02      | 0.200     | 0.0197    | 0.007  |           |           |           |
| No. 2 Fuel (b)                    | 0.03     | 0.03      | 0.03      | 0.03      | 0.03   | 0.03      | 0.03      | 0.03      | 0.03   |           |           |           |
| <u>Heat Input (MMBtu/yr) (c)</u>  |          |           |           |           |        |           |           |           |        |           |           |           |
| Wood                              | 45.68%   | 1,746,985 | 1,746,985 | 1,746,985 | 52.05% | 1,668,881 | 1,668,881 | 1,668,881 | 44.68% | 1,650,798 | 1,650,798 | 1,650,798 |
| Bagasse                           | 53.69%   | 2,053,319 | 2,053,319 | 2,053,319 | 47.34% | 1,517,864 | 1,517,864 | 1,517,864 | 54.48% | 2,012,880 | 2,012,880 | 2,012,880 |
| No. 2                             | 0.63%    | 24,094    | 24,094    | 24,094    | 0.61%  | 19,558    | 19,558    | 19,558    | 0.84%  | 31,036    | 31,036    | 31,036    |
| Total                             |          | 3,824,398 | 3,824,398 | 3,824,398 |        | 3,206,304 | 3,206,304 | 3,206,304 |        | 3,694,714 | 3,694,714 | 3,694,714 |
| <u>Emissions (TPY)</u>            |          |           |           |           |        |           |           |           |        |           |           |           |
| April 1999 - March 2000 Emissions | 395.6    | 42.2      | 12.1      | 161.2     | 27.5   | 19.6      | 560.0     | 65.4      | 12.5   |           |           |           |

(a) Based on actual stack test data for the fuel type.

(b) Based upon permit limit.

(c) Based upon actual boiler heat input for period April 1999 - March 2000.

Okeelanta Cogeneration Facility - Boiler A

Emissions in Tons/Month\*

| Date:  | Hours | CO     | NOx    | SO2   | Heat Input (lb/MMBtu) |
|--------|-------|--------|--------|-------|-----------------------|
| Apr-99 | 503   | 23.93  | 15.07  | 2.27  | 217,024               |
| May-99 | 496   | 23.39  | 17.24  | 3.36  | 249,180               |
| Jun-99 | 684   | 34.58  | 24.96  | 4.00  | 354,626               |
| Jul-99 | 673   | 36.20  | 25.86  | 4.23  | 365,544               |
| Aug-99 | 530   | 28.31  | 19.07  | 2.16  | 264,721               |
| Sep-99 | 476   | 34.69  | 15.61  | 2.31  | 217,082               |
| Oct-99 | 458   | 43.38  | 17.04  | 2.74  | 243,384               |
| Nov-99 | 675   | 72.66  | 28.49  | 3.12  | 401,047               |
| Dec-99 | 668   | 52.86  | 28.41  | 4.74  | 400,680               |
| Jan-00 | 712   | 51.79  | 29.63  | 5.15  | 411,189               |
| Feb-00 | 691   | 48.31  | 27.44  | 6.82  | 381,023               |
| Mar-00 | 699   | 28.24  | 23.40  | 6.21  | 318,898               |
| TOTALS | 7,265 | 478.34 | 272.22 | 47.11 | 3,824,398             |

\* Based on daily CEM data and heat input.

**Okeelanta Cogeneration Facility - Boiler B**

**Emissions in Tons/Month\***

| <b>Date:</b>  | <b>Hours</b> | <b>CO</b>     | <b>NOx</b>   | <b>SO2</b>   | <b>Heat Input (lb/MMBtu)</b> |
|---------------|--------------|---------------|--------------|--------------|------------------------------|
| May-99        | 616          | 44.45         | 21.27        | 4.02         | 304,872                      |
| Jun-99        | 176          | 15.07         | 6.31         | 1.26         | 92,989                       |
| Jul-99        | 241          | 25.76         | 9.05         | 1.50         | 137,499                      |
| Aug-99        | 367          | 22.38         | 11.26        | 2.76         | 185,826                      |
| Sep-99        | 519          | 41.93         | 16.81        | 2.81         | 237,705                      |
| Oct-99        | 631          | 55.19         | 24.32        | 2.95         | 345,126                      |
| Nov-99        | 689          | 73.72         | 28.86        | 1.88         | 414,085                      |
| Dec-99        | 652          | 64.08         | 27.22        | 3.70         | 390,726                      |
| Jan-00        | 700          | 50.32         | 28.24        | 4.67         | 399,074                      |
| Feb-00        | 602          | 47.31         | 20.65        | 5.02         | 323,166                      |
| Mar-00        | 106          | 6.37          | 3.57         | 0.98         | 56,028                       |
| Apr-00        | 628          | 38.71         | 22.64        | 6.77         | 319,208                      |
| <b>TOTALS</b> | <b>5,927</b> | <b>485.29</b> | <b>220.2</b> | <b>38.32</b> | <b>3,206,304</b>             |

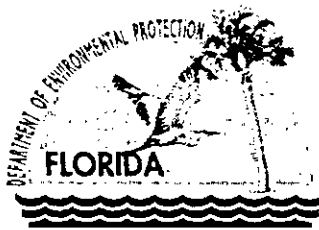
\* Based on daily CEM data and heat input.

Okeelanta Cogeneration Facility - Boiler C

Emissions in Tons/Month\*

| Date:  | Hours | CO     | NOx    | SO2   | Heat Input (lb/MMBtu) |
|--------|-------|--------|--------|-------|-----------------------|
| Apr-99 | 521   | 34.94  | 15.47  | 2.18  | 221,663               |
| May-99 | 392   | 25.46  | 12.45  | 1.79  | 182,454               |
| Jun-99 | 600   | 41.66  | 20.92  | 2.79  | 300,769               |
| Jul-99 | 580   | 40.01  | 20.80  | 6.31  | 300,230               |
| Aug-99 | 594   | 40.11  | 21.03  | 5.49  | 298,402               |
| Sep-99 | 182   | 13.56  | 5.57   | 1.64  | 75,299                |
| Oct-99 | 568   | 57.01  | 22.14  | 2.68  | 322,018               |
| Nov-99 | 717   | 75.55  | 31.11  | 3.02  | 435,485               |
| Dec-99 | 711   | 66.60  | 31.18  | 5.19  | 436,481               |
| Jan-00 | 741   | 65.87  | 31.03  | 4.87  | 427,650               |
| Feb-00 | 696   | 64.40  | 27.75  | 6.25  | 387,103               |
| Mar-00 | 676   | 37.27  | 21.69  | 5.59  | 307,160               |
| TOTALS | 6,978 | 562.44 | 261.14 | 47.80 | 3,694,714             |

\* Based on daily CEM data and heat input.



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

October 10, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Request for Additional Information No. 2  
Project No. 0990332-013-AC (PSD-FL-196L)  
Okeelanta Power L.P. Cogeneration Plant  
Addition of Natural Gas as a Supplemental Fuel

Dear Mr. Cepero:

On September 18, 2000, the Department received the additional information for the above referenced project. The application remains incomplete. In order to continue processing your application, the Department will need the additional information requested 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.

1. Table B (CEMS Data) indicates an average SO<sub>2</sub> emissions rate of 0.028 lb/mmBTU for Boiler A. However, the individual worksheet for Boiler A indicates an average SO<sub>2</sub> emissions rate of 0.037 lb/mmBTU for this boiler. Please explain and/or correct.
2. The Department preliminarily determines that the proposed project does not meet the definition of a "pollution control project" as defined in 40 CFR 52.21(b)(32). The stated purpose is to increase reliability and availability of the cogeneration boilers as well as reduce maintenance rather than "for purposes of reducing emissions from such unit". The Department is considering the request to regard the cogeneration boilers as "electric utility steam generating units" for the purpose of Rule 62-210.200(12)(d), F.A.C. For such a unit, this rule allows the facility to project and use "representative actual annual emissions of the unit following the physical or operational change" in lieu of future potential annual emissions.

The "Current Actual Emissions" tables presented for Boilers A, B, and C list some emission factors that are lower than the annual average based on CEMS data. For example, the annual average NO<sub>x</sub> emission rate for Boiler C based on CEMS data is 0.144 lb/mmBTU. However, the NO<sub>x</sub> emission factors for Boiler C by fuel type are:

|           |                 |
|-----------|-----------------|
| Wood      | = 0.14 lb/mmBTU |
| Bagasse   | = 0.13 lb/mmBTU |
| No. 2 Oil | = 0.15 lb/mmBTU |

Based on the annual heat inputs provided for each fuel, the Department estimates the following past actual annual emissions:

|                 |   |
|-----------------|---|
| Wood (TPY)      | = 0.14 lb/mmBTU x 1,444,186 mmBTU/yr = 101.09 TPY |
| Bagasse (TPY)   | = 0.13 lb/mmBTU x 1,760,932 mmBTU/yr = 114.46 TPY |
| No. 2 Oil (TPY) | = 0.15 lb/mmBTU x 27,024 mmBTU/yr = 2.03 TPY      |
| Total (TPY)     | = <u>217.58</u> TPY                               |

However, the table lists the past actual annual emissions as 232.7 TPY based on an average annual CEMS emissions rate of 0.144 lb/mmBTU. Please explain each of the factors and the differences in the calculations. This is important

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for establishing past actual annual emissions. The following table summarizes the Department's emissions comparison for this project.

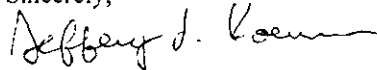
| Emissions Scenario      | Annual Emissions, TPY |        |       |
|-------------------------|-----------------------|--------|-------|
|                         | CO                    | NOx    | VOC   |
| Past Actuals            | 1364.50               | 685.46 | 46.06 |
| Max. Allowable Increase | 99.00                 | 39.00  | 39.00 |
| Max. Future Actuals     | 1463.50               | 724.46 | 85.06 |

Please comment.

3. The Department believes 40 CFR 60.44a(d)(2) is applicable because a physical change and a change in the method of operation are being made to a unit that is currently subject to NSPS Subpart Da. The addition of new burners after the July 9, 1997 deadline will allow the firing of a fuel that is regulated by this NSPS. The NOx emission standard will be 0.15 lb/mmBTU, identical to what OkPLP has proposed. Please comment.

The Department will resume processing your application after receipt of the requested information. 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. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/414-7268.

Sincerely,



Jeffery F. Koerner, P.E.  
New Source Review Section

AAL/jfk

cc: Mr. James Meriwether, OkPLP  
Mr. David Dee, Landers and Parsons  
Mr. David Buff, Golder Associates  
Mr. David Knowles, SD  
Mr. Darrel Graziani, PBCHD  
Mr. Gregg Worley, EPA Region 4  
Mr. John Bunyak, NPS

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
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Article Sent To:  
**Gus Cepero, Vice President**

|   |           |  |
|---|-----------|--|
| Postage   | \$        | Okeelanta Power<br>Limited Partner<br>ship |
| Certified Fee                                     |           |  |
| Return Receipt Fee<br>(Endorsement Required)      |           |  |
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| <b>Total Postage &amp; Fees</b>                   | <b>\$</b> | Postmark<br>Here                           |

Name (Please Print Clearly) to be completed by mailer  
**Mr. Gus Cepero**  
 Street, Apt. No., or PO Box No.  
**P. O. Box 9**  
 City, State, ZIP+4  
**South Bay, FL 33493**

PS Form 3800, July 1999 See Reverse for Instructions

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- 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.

1. Article Addressed to:  
**Gus Cepero, Vice President**  
**Okeelanta Power Limited**  
**Partnership**  
**P. O. Box 9**  
**South Bay, FL 33493**

**COMPLETE THIS SECTION ON DELIVERY**

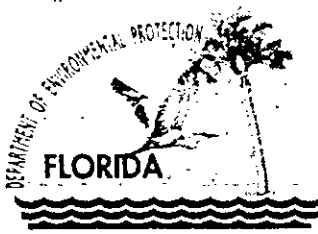
|  |  |
|--|--|
| A. Received by (Please Print Clearly)<br><i>Kathy Yurkes</i>                           | B. Date of Delivery<br><i>10-13-00</i>                               |
| C. Signature<br><i>Kathy Yurkes</i>  | <input type="checkbox"/> Agent<br><input type="checkbox"/> Addressee |
| D. Is delivery address different from item 1?<br>If YES, enter delivery address below: | <input type="checkbox"/> Yes<br><input type="checkbox"/> No          |

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4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Copy from service label)  
**7099 3400 0000 1453 2306**



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

July 14, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Request for Additional Information No. 1  
Project No. 0990332-013-AC (PSD-FL-196L)  
Okeelanta Power L.P. Cogeneration Plant  
Addition of Natural Gas as a Supplemental Fuel

Dear Mr. Cepero:

On June 20, 2000, the Department received your application and sufficient fee for an air construction permit to add natural gas as a supplemental fuel for the boilers in the cogeneration plant located near South Bay in Palm Beach County, Florida. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested 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.

1. Okeelanta Power L.P. (OkPLP) requests the addition of natural gas as an approved fuel for each of the three cogeneration boilers. Gas will be fired to supplement the biomass fuels for startups, interruptions of the biomass feed handling system, disruptions to the ash handling system, high-moisture biomass fuels, etc. Gas will eventually displace distillate oil as the prime supplemental fuel. Although gas firing will likely be infrequent, the request includes the ability to fire 100% on gas (605 mmBTU of heat input) to attain the full steam rate of each unit. OkPLP notes that total fossil fuel firing, including gas, is limited by permit to no more than 25% of the total heat input to each boiler on a calendar quarter basis. The addition of natural gas will reduce maintenance and increase reliability and availability of the units.

*Please comment.*

2. The project will add new low-NOx gas burners to each boiler. The maximum gas firing rate for each boiler will be 0.605 million SCF per hour. The maximum annual gas consumption will be less than 1325 million SCF per year due to the restriction on fossil fuel firing. OkPLP believes the project will reduce emissions of CO, PM, and VOC.

*Please identify the make, model, and number of gas burners proposed for each boiler. Table 1 identifies the emissions from gas firing based on AP-42 emissions factors. Please provide emissions performance data for CO, NOx, PM, and VOC from the manufacturer.*

3. Under current conditions, urea is injected to control NOx emissions just below 0.15 lb/mmBTU for biomass and distillate oil firing. Urea usage has averaged approximately 18 gallons per hour per boiler. After the installation of the gas burners, NOx emissions will continue to be controlled by urea injection. When using gas as a supplemental fuel (approximately 10% of the total heat input), OkPLP expects no increase in urea usage. When firing 100% natural gas, urea usage is not expected to increase because of the use of low NOx burners with uncontrolled emissions below 0.2 lb/mmBTU.

*What is the current cost per gallon of urea? What is the proposed cost per therm of natural gas? The Department notes that low NOx burners are available with NOx emission levels near 0.10 lb/mmBTU. Please describe the factors OkPLP considered in selecting a gas burner with higher NOx emissions.*

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4. The proposed project would be subject to the NSPS emissions standards of Subpart Da:

60.40a. Applicability

- (a)(1) > 250 mmBTU per hour of heat input from fossil fuel, either alone or in combination with any other fuel; and
- (a)(2) Construction commenced after September 18, 1978

60.42a. Standard for Particulate Matter

- (a)(1) ≤ 0.03 lb/mmBTU of heat input from a gaseous fuel
- (b) ≤ 20% opacity (6-minute average), except for one 6-minute average per hour not more than 27% opacity

60.43a. Standard for Sulfur Dioxide

- (b)(2) < 0.20 lb/mmBTU of heat input from fossil fuel
- (g) Compliance based on a 30-day rolling average
- (h) When different fuels are combusted simultaneously, applicable standard is prorated

60.43a. Standard for Nitrogen Oxides

- (a)(1) ≤ 0.20 lb/mmBTU of heat input from a gaseous fuel, 30-day rolling average
- (d)(2) ≤ 0.15 lb/mmBTU of heat input from a gaseous fuel, 30-day rolling average (for any affected facility modified or reconstructed after July 9, 1997)

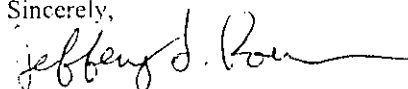
*The application suggests that (a)(1) applies. The Department believes that (d)(2) applies. Please comment.*

5. Table 1 of the application identifies the short-term emissions rates in terms of "lb/mmBTU" of heat input.

*To determine PSD applicability for this project, please calculate and compare the past actual emissions to future potential emissions. The past actual emissions should reflect the average rate, in tons per year, at which each boiler actually emitted the pollutant during the previous two years of operation. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period. CEMS data should be used whenever available. Potential emissions after completion of the project should be calculated based on current permit allowable emissions and conditions or any newly requested allowable emissions limits and conditions.*

The Department will resume processing your application after receipt of the requested information. 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. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/414-7268.

Sincerely,



Jeffery F. Koerner, P.E.  
New Source Review Section

jfk

cc: Mr. David Buff, Golder Associates  
Mr. David Knowles, CD  
Mr. Jim Stormer, PBCHD  
Mr. Gregg Worley, EPA Region 4  
Mr. John Bunyak, NPS

Z 341 355 332

US Postal Service  
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| Sent to<br>Mr. Gus Cepero, V.P.                             |           |
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| Post Office, State, & ZIP Code<br>South Bay, FL 33493       |           |
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| Request for Add. Info. #1                                   |           |
| Proj. No. 0990332-013-AC                                    |           |
| (PSD-FL-196L)   |           |

PS Form 3800, April 1995

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1. Article Addressed to:  
Mr. Gus Cepero, Vice President  
Okeelanta Power Limited  
Partnership  
P.O. Box 9  
South Bay, Florida 33493

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *Kathy Spikes* B. Date of Delivery 7-17-00

C. Signature *X Kathy Spikes*  Agent  Addressee

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Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

June 20, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Bunyak, Chief  
Policy, Planning & Permit Review Branch  
NPS - Air Quality Division  
P.O. Box 25287  
Denver, CO 80225

Re: Okeelanta Power Cogeneration Facility  
Project: Addition of Natural Gas as a Supplemental Fuel  
PSD-FL-196L  
Facility ID No. 0990332-013-AC

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for a modification to an existing PSD source. The applicant proposes to add natural gas as a supplemental fuel for three existing cogeneration boilers. The applicant expects uncontrolled emissions of all pollutants, except NO<sub>x</sub>, to decrease when firing natural gas. However, each boiler currently injects urea to control NO<sub>x</sub> emissions and the project should not result in increased NO<sub>x</sub> emissions after control. The proposed modification is not expected to result in increased urea usage.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact the project engineer, Jeff Koerner, at 850/414-7268.

Sincerely,

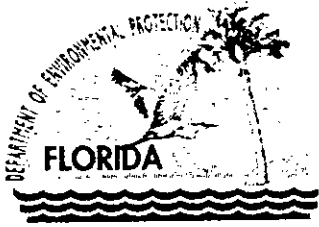
for Al Linero, P.E.  
Administrator  
New Source Review Section

AAL/jfk

Enclosures

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# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

June 20, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gregg Worley, Chief  
Air, Radiation Technology Branch  
Preconstruction/HAP Section  
U.S. EPA - Region 4  
61 Forsyth Street  
Atlanta, GA 30303


Re: Okeelanta Power Cogeneration Facility  
Project: Addition of Natural Gas as a Supplemental Fuel  
PSD-FL-196L  
Facility ID No. 0990332-013-AC

Dear Mr. Worley:

Enclosed for your review and comment is an application for a modification to an existing PSD source. The applicant proposes to add natural gas as a supplemental fuel for three existing cogeneration boilers. The applicant expects uncontrolled emissions of all pollutants, except NO<sub>x</sub>, to decrease when firing natural gas. However, each boiler currently injects urea to control NO<sub>x</sub> emissions and the project should not result in increased NO<sub>x</sub> emissions after control. The proposed modification is not expected to result in increased urea usage.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact the project engineer, Jeff Koerner, at 850/414-7268.

Sincerely,

*for*   
Al Linero, P.E.  
Administrator  
New Source Review Section

AAL/jfk

Enclosures

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