

Golder Associates Inc.

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



August 21, 1997

AUG 22 1997

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF
AIR REGULATION

Re: Okeelanta Power Limited Partnership (Okeelanta) Cogeneration Facility
Permit Amendment No. 0990332-003-AC, PSD-FL-196A
Tire-Derived Fuel Permit Amendment

Dear Mr. Fancy:

Okeelanta received a permit amendment on January 22, 1997, to allow a test burn of tire-derived fuel (TDF) at one boiler located at either Okeelanta or the Osceola Power Limited Partnership (Osceola) cogeneration facility. Specific Condition (S.C.) 11 of the amendment, as amended by letter dated May 13, 1997, extends the existing construction permit until April 1, 1998, in order to allow time to complete the test burn. The TDF performance test is required to be completed by August 31, 1997.

Due to a number of delays this year, and a focus on revising current permit conditions related to biomass firing, Okeelanta desires to postpone the TDF testing until sometime next year. At present, the dates of performance testing cannot be established. Once the pending issues are resolved, further plans to bring TDF on-site will be formulated, and performance testing will be scheduled and conducted (after proper notice to the FDEP).

Based on the above described schedule, it is requested that the TDF test burn authorization be extended until December 31, 1998. This date will allow Okeelanta flexibility in scheduling the performance testing and evaluating the test results.

Thank you for consideration of this request. A permit amendment fee in the amount of \$50 is attached. Please call if you have any questions concerning this request.

Sincerely,

A handwritten signature in cursive script that reads 'David A. Buff'.

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

DB/arz

cc: James Meriwether
File (2)

If IMAGE SAFE logo in light gray tone is not present on back of document - Do not cash.

2200

GOLDER ASSOCIATES GAINESVILLE
3730 SHAMBLEE TUCKER ROAD
ATLANTA, GA 30341

Aug 21 1997

PAY TO THE ORDER OF

Florida Dept. of Environmental Protection \$ 50.00

Sefty dollars & no/xx _____ DOLLARS

FIRST UNION

First Union National Bank
Gainesville, Florida
24 Hour Information Service
1-800-735-1012

FOR 973-7510 0500

David A. Bull

⑈02200⑈ ⑆06300002⑆ ⑆2090002286047⑈

GUARDIAN & SAFETY
FCMART AMERICAN BA

**Berger
Davis &
Singerman**
Professional Association

*al -
Made copy*

215 South Monroe Street Suite 705
Tallahassee, Florida 32301
Phone: 904.561.3010
Fax: 904.561.3013

AL
claim
Howard

RECEIVED

JUN 30 1997

**DIVISION OF AIR
RESOURCES MANAGEMENT**

June 27, 1997

Mr. Howard Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS-5500
Tallahassee, Florida 32399-2400

Re: Request for Notice of Agency Action: Okeelanta Power Limited Partnership
and Osceola Power Limited Partnership

Dear Howard:

Pursuant to Section 120.60(3), Florida Statutes, I hereby request notice of any decision that may constitute agency action or intended agency action by the Department regarding any request, by permit application, notice of general permit or otherwise, made by Okeelanta Power Limited Partnership or Osceola Power Limited Partnership (collectively, "OPLP") regarding construction, operation or modification of either of the OPLP facilities location in Palm Beach County. The request includes but is not limited to:

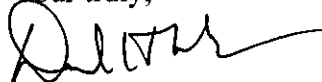
1. Renewal, extension or modification of any permit or permit condition for any of the activities now addressed in air construction permit number AC-50-219413/PSD-FL196.
2. Renewal, extension, or modification of any permit or permit condition for any of the activities now addressed in air construction permit number AC-50-21975/PDS-FL-197.
3. Renewal, extension or modification of any permission to burn tire derived fuel.
4. Any agency action regarding the OPLP Title V permit applications currently pending at the District.

Page Two
June 27, 1997

I also request notification of any determination by the Department that any such activities by OPLP are exempt from permitting or any other regulatory requirements of the Department. This request applies to those activities that are being or will be considered by the Division of Air Resources Management. To the extent any of these activities require action by the Department's South District Office, I am making a similar request to the District Office.

Please let me know if you have any problems or questions regarding this request. Thank you for your consideration.

Your truly,



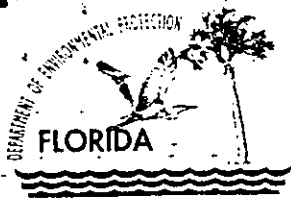
Daniel H. Thompson

DHT/eam

cc: Peggy Highsmith

Berger Davis & Singerman

215 South Monroe Street Suite 705 Tallahassee, Florida 32301 Phone: 904.561.3010 Fax: 904.561.3013



File

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 24, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James M. Meriwether
Environmental Manager
Okeelanta Power Limited Partnership
Post Office Box 8
South Bay, Florida 33493

Re: Tire Derived Fuel (TDF) Test Protocol
Okeelanta Power Cogeneration Plant
AIRS No. 0990332-003-AC (PSD-FL-196)


Dear Mr. Meriwether:

The Department has reviewed your June 13 TDF Performance Test Protocol submitted in response to Specific Condition No. 19 of the above referenced permit.

The Department approves the proposed test protocol. During the test, you are requested to keep any ash generated while burning TDF separate from the ash previously generated at this plant and coordinate its disposal with the Department's South District.

If you have any questions on this matter, please call Willard Hanks at 904/488-1344.

Sincerely,


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

HLR/wh/t

cc: David Knowles, SD
Jeff Koerner, PBCPHU

Florida Department of
Environmental Protection

Memorandum

TO: ~~Howard L. Rhodes~~

THRU: ~~Clair Fancy~~
Al Linero *copy 6/23*

FROM: Willard Hanks

DATE: June 25, 1997

SUBJECT: Okeelanta Power LP
TDF Permit Test Protocol
AIRS ID No. 0990332-003-AC, PSD-FL-196

*O.K. send out
+ copy files.
al*

Attached for approval and signature is a letter that will approve the tire derived fuel performance test protocol proposed by Okeelanta Power L.P. Approval of the test protocol is required by Specific Condition No. 19 of amended permit number AC50-2191413/PSD-FL-196 for Okeelanta Power's cogeneration plant located near South Bay, Palm Beach County.

This amendment allows emission and ash analysis data to be gathered while burning a blend of wood chips and tire derived fuel (TDF) to confirm this fuel can be burned in compliance with the existing permit and the Department's regulations. If data collected during the test burn confirms the fuel blend can be burned in compliance with all requirements, the construction permit will be amended again to allow this blended fuel to be burn on a continuous basis. Emission controls consist of electrostatic precipitators for control of particulate matter, selective non-catalytic reduction for nitrogen oxides, and carbon injection for mercury. The test may provide the Department with reasonable assurance that the plant can burn TDF without contravening Department standards, rules or permit conditions.

I recommend your approval and signature of the attached letter on the test protocol.

CHF/wh

Attachment

Is your RETURN ADDRESS completed on the reverse side?

SENDER.
 ■ Complete items 1 and/or 2 for additional services.
 ■ Complete items 3, 4a, and 4b.
 ■ Print your name and address on the reverse of this form so that we can return this card to you.
 ■ Attach this form to the front of the mailpiece, or on the back if space does not permit.
 ■ Write "Return Receipt Requested" on the mailpiece below the article number.
 ■ The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
 1. Addressee's Address
 2. Restricted Delivery
 Consult postmaster for fee.

3. Article Addressed to:
 James M. Meriwether, Encls
 Cleelanda Power, LP
 P O Box 8
 South Bay, FL
 33493

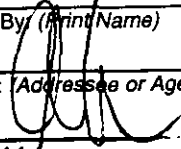
4a. Article Number
 P 265 659 231

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 7/2/97

5. Received By (Print Name)

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

6. Signature: (Addressee or Agent)
 X  Ambros

PS Form 3811, December

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 231

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

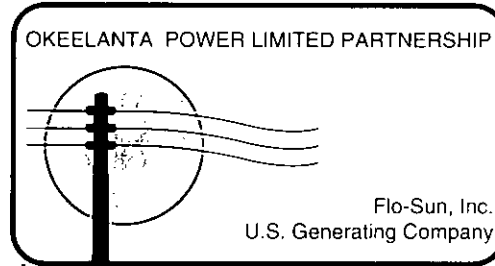
Sent to	James M Meriwether
Street & Number	Cleelanda Power
Post Office, State, & ZIP Code	South Bay, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	6-24-97
0990332-005-AE P50-FI-196	

PS Form 3800, April 1995

RECEIVED

JUN 16 1997

**DIVISION OF AIR
RESOURCES MANAGEMENT**



June 13, 1997

State of Florida
Department of Environmental Protection
Twin Towers Office Building
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

*CLAIR - HANDLES
P.C.S. Thanks,
Pat
x.c: HLR 6/16*

Attn: Mr. Howard L. Rhodes, Director
Division of Air Resources Management

Re: Okeelanta Power Limited Partnership
AIRS ID No. 0990332-003-AC, PSD-FL-196
Tire Derived Fuel Performance Test Protocols

Dear Mr. Rhodes:

On January 22, 1997 the Florida Department of Environmental Protection (FDEP) authorized a performance test at the Okeelanta or Osceola Cogeneration Plants while utilizing a blended fuel consisting of biomass and tire-derived fuel (TDF). The performance test will be conducted in order to gather data regarding air emissions, any operating limitations on burning a blend of TDF in the boiler, and to determine the metal content in the bottom and fly ash.

Condition #19 of the above referenced TDF Permit Amendment requests that a test protocol be submitted for approval prior to commencement of testing. The protocol must specify the pollutants to be tested and the sampling and analytical methods to be used for air, fuel and ash.

The TDF performance test will be conducted on one boiler at the Okeelanta Cogeneration Plant. The test protocols for air (Appendix A), fuel (Appendix B) and ash (Appendix C) are attached for your review and approval. If you have any questions please contact me at (561) 993-1003.

Sincerely,

James M. Meriwether
Environmental Manager

cc: C. H. Fancy - FDEP/Tallahassee
A. A. Linero - FDEP/Tallahassee
Willard Hanks - FDEP/Tallahassee
James Pennington - FDEP/Tallahassee
M. D. Harley - FDEP/Tallahassee
John M. Ruddell - FDEP/Tallahassee
William W. Hinkley - FDEP/Tallahassee
Mary Jean Yon - FDEP/Tallahassee
David M. Knowles - FDEP/South District
Philip Barbaccia - FDEP/South District
William F. Krumbholz - FDEP/South District
Charles Emery III - FDEP/South District
James E. Stormer - PBCHD
Ajaya K. Satyal - PBCHD
Jeffery Koerner - PBCHD
David Buff
Matt Capone
Andrew Carlin
Jim Carlton
Gus Cepero
David Dee
Michelle Golden
Michael Keegan
Ricardo Lima
Keith Mazur
Steve Pileski
Carlos Rionda
Jack Roberson
Steve Sorrentino
Bill Tarr
Rodney Williams

APPENDIX A

OKEELANTA POWER LIMITED PARTNERSHIP TDF/BIOMASS PERFORMANCE TEST

Air Emission Test Parameters and Methodology

1.	Selection of sample site and velocity traverses	EPA Method 1
2.	Gas velocity and flow rate	EPA Method 2
3.	Oxygen, carbon dioxide, mol. wt.	EPA Method 3 or 3A
4.	Flue gas moisture	EPA Method 4
5.	Total suspended particulate (TSP)	EPA Method 5
6.	PM ₁₀	EPA Method 201 or 201A
7.	Nitrogen oxides	EPA Method 7 or 7E
8.	Sulfur dioxide	EPA Method 6, 6C, 8 or 19
9.	Sulfuric acid mist	EPA Method 8 (modified)
10.	Opacity	EPA Method 9
11.	Carbon monoxide	EPA Method 10
12.	Volatile organic compounds	EPA Method 18, 25 or 25A
13.	Fluoride	EPA Method 13A or 13B
14.	Lead	EPA Method 29
15.	Mercury	EPA Method 29
16.	Beryllium	EPA Method 29
17.	Arsenic	EPA Method 29
18.	Chromium/Copper	EPA Method 29
19.	Cadmium	EPA Method 29
20.	Zinc oxide	EPA Method 29
21.	Hydrochloric acid	EPA Method 26 or 26A
22.	Benzene	EPA Method 18
23.	Dioxin/Furan	EPA Method 23
24.	PCB	EPA Method 23

APPENDIX B

OKEELANTA POWER LIMITED PARTNERSHIP TDF/BIOMASS PERFORMANCE TEST

Fuel Sampling and Analytical Methodology

1. One (1) as-fired fuel sample (blend of biomass and TDF) will be collected each day from the fuel conveyor belt prior to the feeders and composited into a weekly sample for analysis. This sampling schedule will be followed throughout the blended fuel test burn period. The weekly composite sample will be analyzed for the constituents listed in the "Metals Table" below.
2. During the Seven-Day Ash Test a total of three (3) as-fired fuel samples (blend of biomass and TDF) will be collected each day from the fuel conveyor belt prior to the feeders and composited into a daily sample for analysis. The seven (7) composite fuel samples will be analyzed for the constituents listed in the "Metals Table" below.
3. During the PM₁₀ emission tests a total of one (1) as-fired fuel sample (blend of biomass and TDF) will be collected from the fuel conveyor belt prior to the feeders during each of the three emissions test and composited into one (1) sample and analyzed for the constituents listed in the "Metals Table" below.

Metals Table

Fuel samples will be analyzed using the SW-846 Method 3050 (Metals Digestion Procedure). Following digestion the individual metals will be analyzed as per the corresponding method below. In addition, the fuel samples (blend of biomass and TDF) will be reduced in size to pass through a #60 mesh screen prior to analysis.

A.	Arsenic	Method 7060	F.	Lead	Method 7421
B.	Beryllium	Method 6010	G.	Mercury	Method 7471
C.	Cadmium	Method 6010	H.	Selenium	Method 7740
D.	Chromium	Method 6010	I.	Silver	Method 6010
E.	Copper	Method 6010	J.	Zinc oxide	Method 6010

APPENDIX C

OKEELANTA POWER LIMITED PARTNERSHIP TDF/BIOMASS PERFORMANCE TEST

Ash Sampling and Analytical Methodology

1. One (1) sample of fly ash and one (1) sample of bottom ash will be collected each day at the points of generation and composited into weekly bottom and fly ash samples for analysis. This sampling schedule will be followed throughout the blended fuel test burn period. The weekly composite sample will be analyzed for the constituents listed in the "Metals Table" below.
2. During the PM₁₀ emission tests a total of one (1) fly ash sample and one (1) bottom ash sample will be collected at the points of generation during each of the three emissions tests and composited into bottom and fly ash samples and analyzed for the constituents listed in the "Metals Table" below.
3. Fly ash and bottom ash samples will also be collected at the points of generation during the blended fuel test burn period and analyzed in accordance with EPA Pub. No. EPA530-R-95-036, "Guidance For The Sampling and Analysis Of Municipal Waste Combustion Ash For The Toxicity Characteristic", June 1995. Composite samples of fly and bottom ash will be analyzed for the constituents in the "Metals Table" below. The constituents in the "Metals Table" will also be analyzed using the Toxicity Characteristic Leaching Procedure (TCLP, Method 1311 of SW-846).
4. Two (2) composite samples each of fly ash and bottom ash will be collected at the beginning of the Seven Day Ash Test and analyzed for the organic constituents listed in 40 CFR 261.24 Table 1 using SW-846 Test Method 1311 (TCLP). If organic constituents are present, then the remainder of composite ash samples will be analyzed in the same manner.
5. Two (2) composite samples each of fly ash and bottom ash will be collected at the beginning of the Seven Day Ash Test and analyzed for those PCDD/PCDF constituents listed in SW-846 Test Method 8290. The ash samples will be analyzed using SW-846 Test Method 8290.

Metals Table

Fly ash and bottom ash will be analyzed using the SW-846 Method 3050 (Metals Digestion Procedure). Following digestion the individual metals will be analyzed as per the corresponding method below.

A.	Arsenic	Method 7060	F.	Lead	Method 7421
B.	Beryllium	Method 6010	G.	Mercury	Method 7471
C.	Cadmium	Method 6010	H.	Selenium	Method 7740
D.	Chromium	Method 6010	I.	Silver	Method 6010
E.	Copper	Method 6010	J.	Zinc oxide	Method 6010