

November 9, 1995

RECEIVED

NOV 15 1995

**BUREAU OF
AIR REGULATION**

State of Florida
Department of Environmental Protection
Division of Air Resources Management
New Source Review Section
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attn: Mr. A. A. Linero, P.E.
Administrator

Re: Okeelanta Power Limited Partnership (OPLP)
PSD-FL-196, AC50-219413
Permit Amendment

Dear Mr. Linero:

In our letter dated September 22, 1995, OPLP requested an amendment to our PSD permit (PSD-FL-196; AC50-219413) that was issued by the Florida Department of Environmental Protection (FDEP). This amendment was requested to ensure that OPLP's PSD is consistent with the regulatory requirements of 40 CFR 60.59a (a) (1), which provides that, "The initial report to FDEP from a cofired combustor must include a copy of a Federally-enforceable permit limiting the maximum amount of MSW that may be combusted in the cofired combustor, expressed as a percentage of the aggregate fuel feed stream." At the present time the OPLP PSD permit does not contain a limit on the "specific percentage" of MSW that may be combusted at the facility. The amendment was requested to be consistent with the above referenced standard and to ensure compliance with all potentially applicable standards.

After the PSD permit was issued, OPLP became aware that 40 CFR 60 Subpart Ea, Standards of Performance for Municipal Waste Combustors (MWC), could be applicable to this facility. This is primarily due to the broad definition of Municipal Solid Waste (MSW) in Subpart Ea. Discussions with EPA confirmed our initial suspicion. However, the Okeelanta facility will qualify for the exemption for cofired combustors at 40 CFR 60.50a (e), if the OPLP PSD permit is amended. The amendment requested September 22, 1995, is intended to include the specific permit language required by the exemption, but the amendment is not intended to allow any changes to the amount or types of fuels to be combusted.

Specific Condition No. 12 of OPLP's PSD permit is very specific about the types of fuel that may be combusted at the site.

"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."

In the 1991 Federal Register notice for Subpart Ea, EPA indicated that "municipal solid waste" includes "yard wastes."⁵⁶ Federal Register 5490 (February 11, 1991). As part of the delivered fuel stream, OPLP may combust (but tries to avoid) leaves, grass clippings or similar vegetative material. This material could be defined as yard waste or MSW. For this reason and this reason alone, OPLP has requested our permit be amended to limit the amount of these materials in our fuel feed stream to 30% or less. OPLP is not requesting approval to combust any fuels outside the scope of our current PSD permit.

It is my understanding that the EPA regulations for cofired combustors will be clarified and simplified. Under the new regulations, cofired combustors will not be subject to the MWC regulations if the owner or operator of the facility: (a) notifies EPA that the facility is exempt from the MWC regulations; (b) provides EPA with a copy of its federally enforceable permit, which limits the facility to using no more than 30% MSW as fuel; and (c) keeps a record on a calendar quarter basis of the weight of municipal solid waste combusted at the cofired combustor and the weight of all other fuels combusted at the cofired combustor.

In addition, "clean wood" has been excluded from the definition of MSW. Consequently, if OPLP burns clean wood as fuel, the clean wood will not count toward the 30% limitation for cofired combustors, even if the clean wood comes from residential areas.

The proposed regulations will also provide more flexibility for the operation of the OPLP facility because they indicate that the 30% limitation on cofired combustors will be based on the weight of municipal solid waste (MSW) that is used in the cofired combustor "as measured on a calendar quarter basis." Earlier versions of the proposed EPA rules required compliance with the 30% limit on a daily basis.

These MWC regulations were signed in final form on October 31, 1995 and can be reviewed on EPA's electronic bulletin board.

In summary, OPLP has requested an amendment to our PSD permit that incorporates language limiting the amount of MSW that may be used for fuel at the facility. Proposed language can be found on page two, paragraph five of our letter dated September 22, 1995. For the purposes of this amendment, the only "MSW" that OPLP may potentially use as fuel is defined as yard trash, i.e., leaves, grass clippings, and certain similar vegetative matter.

In our original request OPLP submitted a \$50.00 check for the requested permit amendment fee. During a recent conversation you indicated the appropriate fee is \$250.00. Enclosed is a check for an additional \$200.00 to cover the outstanding balance. Please call James Meriwether or myself at (407) 993-1003 if you have any questions.

Sincerely,



Dennis V. Space
General Manager

cc: C. Fancy - FDEP/TLH
J. Meriwether
D. Dee

bc: C. Staley
D. Schaberg
M. Griffin
M. Carney

OPLP File No. 6.3.1.5

cc: SED
NPS
EPA
T. Heron
P. B. Co.

OKEELANTA POWER LTD. PARTNERSHIP

6 MILES SOUTH OF SOUTH BAY
ON US HWY. 27
SOUTH BAY, FL 33493

1245

83-643/87D
03868

October 31 19 95

PAY TO THE ORDER OF Florida Department of Environmental Protection | \$200.00**

Two hundred and 00/100-----DOLLARS



First Union National Bank
of Florida
Ft. Lauderdale, Florida
24 Hour Information Service
1-800-735-1012

FOR PSD-FL-196;AC50-219413 Permit Amendment Fee

⑈001245⑈ ⑆067006432⑆ 2090000511374⑈

GUARDIAN SAFETY
EXCLUSIVE AMERICAN B



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 25, 1995

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Dennis Space
Project Director
Okeelanta Power L.P.
Post Office Box 117
South Bay, Florida 33493

RE: Okeelanta Cogeneration Facility
PSD-FL-196, AC50-219413

Dear Mr. Space:

The Bureau of Air Regulation received your September 22, 1995, request to amend the above referenced permit. Rule 62-4.050(4)(o), F.A.C., requires a \$250 processing fee for a permit amendment; therefore, we will not be able to begin processing your request until an additional \$200 is received.

Although we have not processed the amendment, a cursory review indicates that the matter may require more than an amendment to implement.

If you have any questions, please call Willard Hanks or Patty Adams at (904)488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/pa

cc: C. Fancy

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4 & 5.
- 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Dennis Space, PD
 Keelanta Power, LP
 PO Box 117
 South Bay, FL 33493

4a. Article Number
 2127 632 556

4b. Service Type

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<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery
 10-30-95

5. Signature (Addressee)

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

6. Signature (Agent)

Thank you for using Return Receipt Service.

2 127 632 556

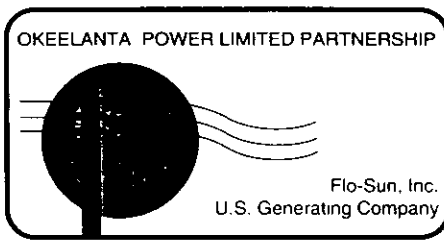


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Dennis Space	
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Keelanta Power	
P.O., State and ZIP Code	
S. Bay, FL	
Postage	\$
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AC-50-219413	
PSD-FI-196	

PS Form 3800, March 1993

al



October 16, 1995

Air Pesticides and Toxic Substances Management Division
Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

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OCT 19 1995
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AIR REGULATION

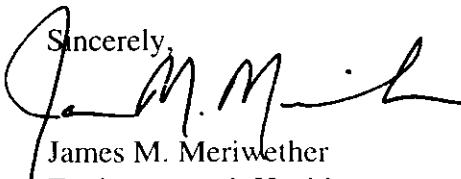
Attn: Mr. Winston A. Smith, Director

Re: Okeelanta Power Limited Partnership
Palm Beach County
South Bay, Florida
Initial Firing of Auxiliary Boilers
PSD-FL-196

Dear Mr. Smith:

The Okeelanta Power Limited Partnership's (OPLP) "Notification of the Anticipated Date of Initial Startup", dated August 17, 1995, is hereby amended as follows. Boilers "B", "A", and "C" are anticipated to fire biomass for the first time on or after October 24, 25, and 26 respectively. This amendment is required due to changes in the start-up schedule and is a continuation of OPLP's commitment to fulfill the requirements of 40 CFR 60.7 (a) (2).

If you have any questions please contact me at (407) 993-1003.

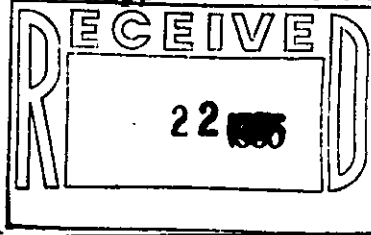
Sincerely,

James M. Meriwether
Environmental, Health
and Safety Representative

cc: Clair Fancy, FDEP/TLH
Ajaya K. Satyal, HRS/PBCo
David M. Knowles, FDEP/Ft. Myers

bc: D. Space J. Ketterling
C. Staley H. Sturm
M. Griffin K. Mazur

M.A. Griffin

Bechtel Corporation
Supplier Document Transmittal



Okeelanta Cogeneration Project
9801 Washingtonian Boulevard, 14th Floor
Gaithersburg, Maryland 20879
301-417-3000

To: Mr. Clifford M. Denker, P.E.
Enviroplan
3 Becker Farm Road
Roseland, NJ 07068

Date: September 21, 1995
Bechtel Job Number 22433
Transmittal Number: BTV95-0721
Purchase Order No.: 22433-J-353
File Number: GA753/GA024,w/1

ACTION CODE TO VENDOR:

1. Work May Proceed.
2. Revise and Re-Submit. Work May Proceed Subject to Incorporation of Changes Indicated.
3. Revise and Re-Submit. Work May Not Proceed.
4. Review Not Required. Work May Proceed.
5. For Information Only.

Other Comments: Status Codes 1, 4, and 5 will not be returned to the supplier.

DESCRIPTION

<u>Action:</u>	<u>Vendor/Bechtel Document No.:</u>	<u>Rev.:</u>	<u>Title:</u>
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See attached listing.

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SEP 22 1995
CURT STALEY

Very Truly Yours,

E. H. Liu
E. H. Liu
Senior Project Engineer

Distribution:

- C. Staley, w/3B (Code 1, 4, or 5 dwgs)
- Control Systems, w/o
- Construction (PLT) w/1B (Code 1, 2, 4, 5 dwgs)
- Start-Up Manager, w/1B

FLO SUN'S COGENERATION PROJECTS
 Xmittal Number Report
 Job Number: 22433
 FROM Xmittal Number: BTV95-0721 TO BTV95-0721

09/21/95

S U P P L I E R D O C U M E N T R E G I S T E R

Document Type	Bechtel No/Po/Contract Locator	Sub	Chng Not	Supplier Number	Sheet	Rev	Sys	Document Title	Received Date	Forecast Date	Xmittal Date	Action	Resp Disc	Remarks
**	BTV95-0721 J-353-0054		02					PERF DRAFT PROTOCOL FOR EVAL OF CEMS UNITS 1,2,3	09/20/95	10/04/95	09/21/95	1	CS	

Okeelanta Power Limited Partnership



RECEIVED

OCT 13 1995
BUREAU OF
AIR REGULATION

October 6, 1995

Mr. Clair Fancy
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blairstone Road
Tallahassee, FL 32399-2400


RE: Okeelanta Cogeneration Facility
CEM Certification Test Protocol
Permit No.: AC50-219413, PSD-FL-196

Dear Mr. Fancy:

Okeelanta Cogeneration Limited Partnership (OPLP) is pleased to submit the enclosed protocol for certification of the Continuous Emission Monitoring (CEM) System required by Special Condition 6 of the PSD permit. I am also forwarding a copy of the protocol to Mr. Mike Harley in the Bureau of Air Monitoring and Mr. David Knowles of the South Florida District to facilitate FDEP's review.

We expect the testing to occur in December of this year and will coordinate with Mr. Knowles. Please call me (301) 718-6973 if you have any questions or comments.

Sincerely,



Michelle Golden Griffin
Environmental Compliance Specialist

MG/tmk

Enclosure

cc: M. Harley, FDEP, Tallahassee
D. Knowles, FDEP, Ft. Myers



Job No: 22433



J-353-0054



02



OKEELANTA COGENERATION PROJECT	
Bechtel Corporation	JOB NO. 22433
SUPPLIER DOCUMENT REVIEW STATUS	
STATUS NO.	
1 <input checked="" type="checkbox"/> Work may proceed.	
2 <input type="checkbox"/> Revise and resubmit. Work may proceed subject to incorporation of changes indicated.	
3 <input type="checkbox"/> Revise and resubmit. Work may not proceed.	
4 <input type="checkbox"/> Review not required. Work may proceed.	
5 <input type="checkbox"/> For information only.	
Permission to proceed does not constitute acceptance or approval of design details, calculations, analyses, test methods or materials developed or selected by the supplier and does not relieve supplier from full compliance with contractual obligations.	
REVIEWED BY <i>J. R. [Signature]</i>	DATE 9-20-95
GA-41224 Small 10/93	

PERFORMANCE SPECIFICATION
TEST PROTOCOL

Prepared for

ENVIROPLAN
3 Becker Farm Road
Roseland NJ 07066
Attn: Clifford Denker

Recon[®]

Division of
RECON Environmental Corp.

5 Johnson Drive, P.O. Box 130
Raritan, NJ 08869-0130

(908) 526-1000
FAX (908) 526-7886

PERFORMANCE SPECIFICATION
TEST PROTOCOL

Prepared for

ENVIROPLAN
3 Becker Farm Road
Roseland NJ 07066
Attn: Clifford Denker

Source:

Okeelanta Cogeneration Project
South Bay, Florida

Facility Permit No. AC50-219413
PSD-FL-196

Prepared by

Frank W. Swetits (ext. 408)
Vice President
AirRECON Division

AirRECON Project No. AR5-6931

September 19, 1995

D.47

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1.0 SOURCE INFORMATION

1.1 PLANT INFORMATION

Contact

OKEELANTA COGENERATION PROJECT
South Bay, Florida

Jim Snyder, Project
Start-up Manager
Phone: 407-992-9900
Fax: 996-2230

1.2 INSTRUMENT INSTALLER

ENVIROPLAN
3 Becker Farm Road
Roseland NJ 07088

Clifford Denker
Phone: 201-994-2300
Fax: 201-994-5100

1.3 CONSULTANT INFORMATION

RECON ENVIRONMENTAL CORP.
5 Johnson Drive
P.O. Box 130
Raritan NJ 08869-0130

John M. Collette or
Frank W. Swetits
Phone: 908-526-1000
Fax: 908-526-7886

1.4 SOURCE OPERATION DURING RA EVALUATIONS

The facility will operate under requirements of 40 CFR 60 for load during the relative accuracy evaluation of the oxygen, nitrogen oxides, sulfur dioxide, carbon dioxide, and carbon monoxide CEM system.

2.0 PROJECT OVERVIEW

The evaluation will be performed at 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). The facility is located at Okeelanta Corporation's sugar mill, which is six miles south of South Bay, off U.S. Highway 27, Palm Beach County, Florida.

The cogeneration facility contains three ABB/CE 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.

ENVIROPLAN is supplying a continuous emission monitoring (CEM) system on the exhaust stack of each of the three boilers. Each CEMS measures and records stack concentrations of oxygen (O₂), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), carbon dioxide, and opacity on a continuous basis.

ENVIROPLAN contracted AirRECON, a division of RECON ENVIRONMENTAL CORP., to perform the relative accuracy (RA) test portion of the initial performance specification test (PST) on each of the O₂, CO₂, SO₂, CO, and NO_x CEM systems. ENVIROPLAN will be performing the calibration error (CE) portion of the opacity monitor evaluations. Calibration drift (CD) will be performed by ENVIROPLAN and/or plant personnel for all monitors.

This protocol describes the source's CEM systems, the reference method CEM system, and the RA, CD and CE test procedures. In summary, AirRECON's reference system will continuously extract (and analyze) gas from the same stack that the plant's systems extracts its sample. Comparison of the reference system data to the plant's CEMS data will determine the relative accuracy performance of the plant's CEM system.

The CD test for SO₂, CO₂, O₂, CO, NO_x, and opacity will be performed by challenging the CEM system with an appropriate upscale and zero calibration standard. All instruments will be challenged on a daily basis for eight consecutive days. Calibration drift performance will be assessed by comparing the CEM system's recorded response to the value of the calibration gas standard.

The opacity monitor will be tested for calibration error. Low, medium and high attenuators will be used to challenge the analyzer five non-consecutive times.

3.0 OKEELANTA/ENVIROPLAN CEM SYSTEM

Table 1 below describes the CEMS for each boiler stack; Table 2 describes the "acceptance" criteria for each instrument.

Table 1

OKEELANTA - CEMEX SYSTEMS						
Instrument Units 1, 2 & 3	ENVIROPLAN Part No.	Gas Constituents		Dilution Number	Orifice Size	Analyzer Ranges
		Maximum Expected	Full Scale			
CO ₂ Analyzer Milton Roy ZRH1	A1086-002	12%	0 - 20%	120	50 ml	0 - 2000 ppm
SO ₂ Analyzer TECO 43B	A1126-003	47 ppm	0 - 60 ppm	120	50 ml	0 - 0.5 ppm
NO _x Analyzer TECO 42D	A1160-003	83 ppm	0 - 240 ppm	120	50 ml	0 - 2 ppm
CO Analyzer TECO 48	A1128- FAFFAJ00	315 ppm	0 - 600 ppm	120	50 ml	0 - 5 ppm
O ₂ Probe/Converter Yokogawa	A1032-000/-002	20%	0 - 25%	N/A	N/A	0 - 25%

Table 2

OKEELANTA - CEMEX SYSTEMS			
Instrument	Allowable Relative Accuracy (%)		Reference *
	In Terms of Mean RM Value	In Terms of Applicable Standard	
CO ₂	≤20	≤1 **	pg. 949, paragraph 2.3
SO ₂	≤20	≤15/20	pg. 944, paragraph 4.3
NO _x	≤20	≤10	pg. 944, paragraph 4.3
CO	≤10	≤5	pg. 950, paragraph 2.3
O ₂	≤20	≤1 **	pg. 949, paragraph 2.3

* Referenced from 40 CFR 60, revised as of July 1, 1994

** One percent difference O₂ or CO₂

4.0 TECHNICAL APPROACH

The principle of the RA test is to sample the stack gas and analyze it using the reference CEMS. The reference method data is then compared to the results of the source CEMS data for SO₂, O₂, NO_x, CO₂ and CO gathered during the same period.

The NO_x, SO₂, and CO CEMS will be evaluated for relative accuracy for concentration (ppm), mass emission rate (pounds/hr) and emissions per heat input (pounds/mmBtu). The pound/million BTU emission rates will be determined using an oxygen based F Factor. Pound/hour rates will be calculated using the pound/million Btu rate and the firing rate (Btu/hr) of each boiler. The O₂ and CO₂ CEMS will be evaluated for RA on a concentration basis.

The acceptability of the opacity monitor will be verified by obtaining a "Certificate of Conformance" from the manufacturer. The "Certificate of Conformance" will serve to verify that the opacity monitor meets the design criteria as stipulate din 40 CFR, Appendix B, PS 1, Sec. 6.5. Calibration error tests will also be conducted to verify performance.

4.1 REFERENCE METHODS

The RA test consists of performing at least nine 21-minute test runs for SO₂, CO₂, O₂, NO_x and CO using EPA Reference Methods (RM) 6C, 3A, 7E and 10 respectively. A maximum of twelve 21-minute test runs may be performed. These tests will be conducted in accordance with Title 40, Code of Federal Regulations (CFR), Part 60, Appendix B, Performance Specifications 2, 3, and 4.

Relative accuracy for oxygen and carbon dioxide will be calculated based upon concentrations only. The relative accuracy for NO_x, SO₂ and CO will be calculated for concentrations (ppmv), mass emission rates (pounds per hour) and emissions per heat input (pounds per million Btu).

4.2 REFERENCE CEM SYSTEM

AirRECON's extractive system consists of a stainless steel probe with a calibration tee, a stack-mounted moisture removal conditioner, and a Teflon sample line, which will convey sample from the stack to a mobile laboratory trailer.

Within the trailer, a sample transport system will filter and distribute sample gas to reference analyzers. The sampling system will follow the specifications of EPA Reference Method 6C.

SO₂, CO₂, O₂, NO_x and CO concentration data will be measured and recorded on a continuous basis on a Molytek strip-chart recorder and an IBM compatible computer. A "snapshot" of stack concentrations will be recorded every 30 seconds.

5.0 CEMS PERFORMANCE EVALUATION

The CEMS performance evaluation determines the system's ability to comply with the CEMS performance specifications contained in 40 CFR 60, Appendix B, Performance Specifications 1 - 4. The performance testing consists of three procedures: relative accuracy (RA), calibration drift (CD), and calibration error (CE) tests.

5.1 RELATIVE ACCURACY TEST PROCEDURES

REFERENCE METHODS 3A, 6C, 7E and 10: The RA testing is initiated by first selecting an appropriate measurement site in each of the stacks. Existing ports at the same location as the CEMS probes will be used for the RA tests. Attachment II contains schematics of each of the stacks and the port locations.

Prior to the start of testing, an analyzer calibration error check and a sampling system bias check will be performed on the reference system.

During the analyzer calibration error check, each reference analyzer will be challenged with zero (less than 0.25% of the instrument span), mid (40 to 60% of span) and high (80 to 100% of span) level calibration gases.

All calibration gases used during the CEMS relative accuracy test will be USEPA Protocol I standards.

The error check will be considered invalid if the gas concentration displayed by the analyzers exceeds $\pm 2\%$ percent of the span for any of the calibration gases introduced to the analyzers.

A bias check will then be conducted by introducing a zero gas and an upscale calibration gas for each analyzer at the sample probe. The upscale standard used will be the one closest in concentration to the average stack concentration.

The bias check will be considered invalid if the system's response differs from the response recorded during the analyzer calibration by more than $\pm 5\%$ of the respective analyzer's span.

The reference method system response time will be determined by observing the times required to achieve stable response for both the zero and higher-level gases.

The following is a summary of the reference method analyzers and their respective operating ranges for this test program.

PARAMETERS	MODEL	RANGE OF OPERATION
O ₂	Servomex 1400	0-25% dry
CO ₂	FUJI 760	0-20% dry
CO	TECO 48	0-1000 ppmvd
NO _x	TECO 42H	0-250 ppmvd
SO ₂	WR-721ATM	0-100 ppmvd

Each test run will be 21 minutes long. After each test run, a zero and calibration drift check will be performed by reintroducing, to the sample probe, the gases used for the bias check. Drift will be considered excessive if monitor response differs from the response recorded during the bias check by more than $\pm 3\%$ of span.

5.2 CALIBRATION DRIFT TEST PROCEDURES

The CD test determines the susceptibility of the CEMS to thermal or electronic drift, which can bias the system's recorded results.

SULFUR DIOXIDE, CARBON DIOXIDE, OXYGEN, NITROGEN OXIDES AND CARBON MONOXIDE: The CD is conducted by calibrating the CEM system's SO₂, CO₂, NO_x, CO₂ and O₂ analyzers at two points once per day for eight consecutive days.

The plant's CEMS system(s) will be calibrated at a zero point and a high point (80 to 90% of each instrument's operating range) once per day. The analyzers' response to the daily CD tests will be compared to the values of the respective calibration standards used during the CD testing.

OPACITY: The calibration drift test will be performed daily for eight consecutive days. The opacity monitor will be challenged with a zero (less than 5%) and then on an upscale attenuator on a daily basis. The response of the opacity CEMS will be recorded by the data acquisition system. An acceptable level of drift is not greater than ±3% opacity.

5.3 OPACITY CALIBRATION-ERROR TEST PROCEDURES

The opacity monitor calibration-error (CE) test consists of inserting, one at a time, three different range-calibrated attenuators (low, medium and high) into the light beam of the transmissometer and recording the analyzer response. The calibration error procedure is repeated five non-consecutive times for each attenuator.

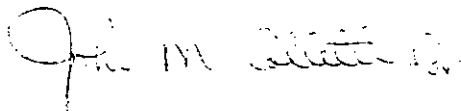
The error-check will be considered invalid if the average response of the opacity monitor to each of the attenuator disks exceeds ±3% opacity. The calibration error test will be performed by ENVIROPLAN or plant personnel.

6.0 REPORTING

A comprehensive final report will be issued, which will include:

- Relative accuracy, calibration drift, and opacity calibration error results
- Relative accuracy, calibration drift, and opacity calibration error calculations
- Field data (raw and summarized)
- Calibration gas certificates
- *Certificate of Conformance* provided by opacity monitor manufacturer
- Serial and model number of the permanently installed SO₂, CO₂, O₂, NO_x, CO and opacity CEM instruments

Submitted by:



Frank W. Swetits
Vice President
AirRECON Division

FWS/prh (D.47)
Enclosure

ATTACHMENT 1

PERMIT



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

April 8, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Cepero:

Re: Permit No. AC 50-219795/PSD-FL-197

The Department is in receipt of your March 28, 1994, letter requesting that the referenced permit be amended. The amendment is to authorize higher steam and electrical production by the facility. This will be accomplished through the use of more efficient steam generators and steam turbines. The maximum heat input and allowable emissions for the facility are not being changed.

This request is acceptable and the facility description in the Best Available Control Technology determination and permit, Specific Condition No. 1, and Specific Condition No. 11 are amended:

From:

Description (Best Available Control Technology determination)

The applicant proposes to construct a 60 MW (gross) electric cogeneration facility consisting of two 665 MMBtu/hr spreader-stoker boilers that will burn biomass (bagasse and wood waste material), No. 2 fuel oil, and coal.

Description (Permit)

Construct a 60 (gross) megawatt (MW), electric, (1-hour average), cogeneration facility (biomass--bagasse and wood waste material as the primary fuel, No. 2 oil as a supplementary fuel, and low sulfur coal as an alternate fuel) at Osceola Farms' sugar mill that is east of Pahokee, Palm Beach County, Florida. The cogeneration

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facility contains two ABB Model VU-40 (or equivalent) spreader-stroker steam boilers with a design heat input for each boiler of 665 million British thermal units per hour (MMBtu/hr) on biomass and 460 MMBtu/hr on fossil fuels. Each boiler will produce approximately 427,400 lbs/hr of steam at 1,500 pounds per square inch gauge (psig) and 950°F. Particulate matter, nitrogen oxides, and mercury emissions from each boiler will be controlled by Flakt, Inc. (or equivalent) electrostatic precipitator, Thermal DeNO_x (or equivalent) selective non-catalytic reduction system, and an activated carbon injection (or equivalent) system, respectively. Auxiliary equipment includes feed and ash handling systems, steam turbines and condensers, electric generators, cooling towers, and stacks that are 7.0 ft in diameter and, a minimum of 180 ft. high.

Specific Conditions

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 60 megawatt (MW), 1 hour average, except during scheduled emission compliance and equipment performance tests. Equipment performance testing in excess of 60 MW 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 the Department with engineering, monitoring, and reporting plans for the generation capacity of the facility within 30 days after the plans become available.

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 60 (gross) megawatts generating capacity, 1 hour average, except during emission compliance and equipment performance tests. Equipment performance tests shall be limited to a 180 day calendar period after initial firing of each boiler. The maximum heat input rate for each steam generator shall not exceed 665 MMBtu/hr when burning 100 percent biomass and 460 MMBtu/hr when burning 100 percent No. 2 fuel oil or low sulfur coal. Maximum heat input to the entire facility (total of two boilers) shall not exceed 7.0×10^{12} Btu per year. Steam production of each boiler shall not exceed an average of 427,409 lbs/hr at 1,500 psig, 950°F.

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To:

Description (Best Available Control Technology determination)

The applicant proposes to construct a 65 MW (gross) electric cogeneration facility consisting of two 665 MMBtu/hr spreader-stroker boilers that will burn biomass (bagasse and wood waste material), No. 2 fuel oil, and coal.

Description (Permit)

Construct a 65 (gross) megawatt (MW), electric, (1-hour average), cogeneration facility (biomass--bagasse and wood waste material as the primary fuel, No. 2 oil as a supplementary fuel, and low sulfur coal as an alternate fuel) at Osceola Farms' sugar mill that is east of Pahokee, Palm Beach County, Florida. The cogeneration facility contains two ABB Model VU-40 (or equivalent) spreader-stroker steam boilers with a design heat input for each boiler of 665 million British thermal units per hour (MMBtu/hr) on biomass and 460 MMBtu/hr on fossil fuels. Each boiler will produce approximately 440,000 lbs/hr of steam at 1,500 pounds per square inch gauge (psig) and 950°F. Particulate matter, nitrogen oxides, and mercury emissions from each boiler will be controlled by Flakt, Inc. (or equivalent) electrostatic precipitator, Thermal DeNO_x (or equivalent) selective non-catalytic reduction system, and an activated carbon injection (or equivalent) system, respectively. Auxiliary equipment includes feed and ash handling systems, steam turbines and condensers, electric generators, cooling towers, and stacks that are 7.0 ft in diameter and, a minimum of 180 ft. high.

Specific Conditions

1. Construction of the proposed cogeneration facility shall reasonably conform to the plans described in the application or permit. The facility shall be designed, constructed, and operated so that its gross generating capacity shall not exceed 65 megawatt (MW), 1 hour average, except during scheduled emission compliance and equipment performance tests. Equipment performance testing in excess of 65 MW 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 the Department with engineering, monitoring, and reporting plans for the generation capacity of the facility within 30 days after the plans become available.

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11. The proposed cogeneration facility steam generating units shall be constructed and operated in accordance with the capabilities and specifications described in the application or permit. The facility shall not exceed 65 (gross) megawatts generating capacity, 1 hour average, except during emission compliance and equipment performance tests. Equipment performance tests shall be limited to a 180 day calendar period after initial firing of each boiler. The maximum heat input rate for each steam generator shall not exceed 665 MMBtu/hr when burning 100 percent biomass and 460 MMBtu/hr when burning 100 percent No. 2 fuel oil or low sulfur coal. Maximum heat input to the entire facility (total of two boilers) shall not exceed 7.0×10^{12} Btu per year. Steam production of each boiler shall not exceed an average of 440,000 lbs/hr at 1,500 psig, 950°F.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

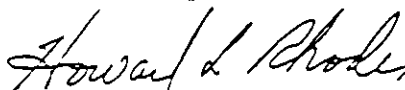
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- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

A copy of this letter must be filed with Permit No. AC 50-219795/PSD-FL-197 and shall become a part of that permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/bjb

Attachment: Osceola Power L.P., March 28, 1994, letter

cc: David Knowles, SD
Isidore Goldman, SED
James Stormer, PBCHD
Jewell Harper, EPA
David Buff, KBN
John Bunyak, NPS

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 4/12/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is
hereby acknowledged.

Laubria J. Boutwell 4/12/94
Clerk Date



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
PBD-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, 524.9 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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Partnership

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GENERAL CONDITIONS:

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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Partnership

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GENERAL CONDITIONS:

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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SPECIFIC CONDITIONS:

6. The permittee shall install and operate continuous monitoring devices for each main boiler exhaust for opacity, nitrogen oxides (NO_x), sulfur dioxide (SO₂), oxygen (O₂), 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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SPECIFIC CONDITIONS:

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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SPECIFIC CONDITIONS:

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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SPECIFIC CONDITIONS:

- 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) ^d						Total All ^e 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
Particulate (PM ₁₀)	0.03	21.5	0.03	14.7	0.03	14.7	172.5
Sulfur Dioxide							
3-hour average	---	---	---	---	1.2	588.0	---
24-hour average	0.10	71.5	0.05	24.5	1.2	588.0	---
Annual average	0.02 ^a	---	---	---	1.2 ^a	---	1,154.3 ^f
Nitrogen Oxides							
Annual average	0.15 ^a	107.3 ^a	0.15 ^a	73.5 ^a	0.17 ^a	83.3 ^a	862.5
Carbon Monoxide							
8-hour average	0.35	250.3	0.2	98.0	0.2	98.0	2,012.5
Volatile Organic Compounds	0.06	42.9	0.03	14.7	0.03	14.7	345.0
Lead	2.5 x 10 ⁻⁵	0.018	8.9 x 10 ⁻⁷	0.0004	6.4 x 10 ⁻⁵	0.031	0.17
Mercury	6.3 x 10 ^{-6b} 0.29 x 10 ^{-6c}	0.0045 ^b 0.00021 ^c	2.4 x 10 ⁻⁶	0.00118	8.4 x 10 ⁻⁶	0.0041	0.0300

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Beryllium	---	---	3.5×10^{-7}	0.00017	5.9×10^{-6}	0.0029	0.0052
Fluorides	---	---	6.3×10^{-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 6, 6C, or 19	PM ₁₀ emissions. 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 25	Volatile organic compounds concentration.
101A	Determination of particulate and gaseous mercury emissions.
104	Determination of beryllium emissions from stationary sources.
108	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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SPECIFIC CONDITIONS:

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

ATTACHMENT 2

STACK DIAGRAMS

DETAIL S153

10'-0" I.D.

L4x4x1/4

L4x4x1/4

L4x4x1/4

L4x4x1/4

135'-11 3/8" FROM BOTTOM OF STACK TO TOP OF STACK

SECTION #3 39'-11 3/8" (WT. = 16.0

71'-11 3/8" OF 1/4" A-36 PL

3 EQUAL SPACES @ 10'-0" = 30'-0"

7'-0 5/8"

8'-0"

4'-7 1/4"

3 EQUAL SPACES @ 9'-5 3/8" = 28'-4 1/8"

FIELD SPLICE
EL. 202'-0 5/8"

PERSONNEL PROTECTION
(BY BECHTEL)

* DAVIT ON FAR SIDE, NOT
SHOWN FOR CLARITY. SEE
SECTION A ON DWG. S2.

* SEE PORT LAYOUT & SCHEDULE
ON DWG. S2 FOR TEST PORT
DETAILS

T.O.G. EL. 187'-0"

LADDER ON FAR SIDE
W/PERSONNEL PROTECTION
(BY BECHTEL)

MATCH LINE

SECTION

P.

CLIMB &
PED

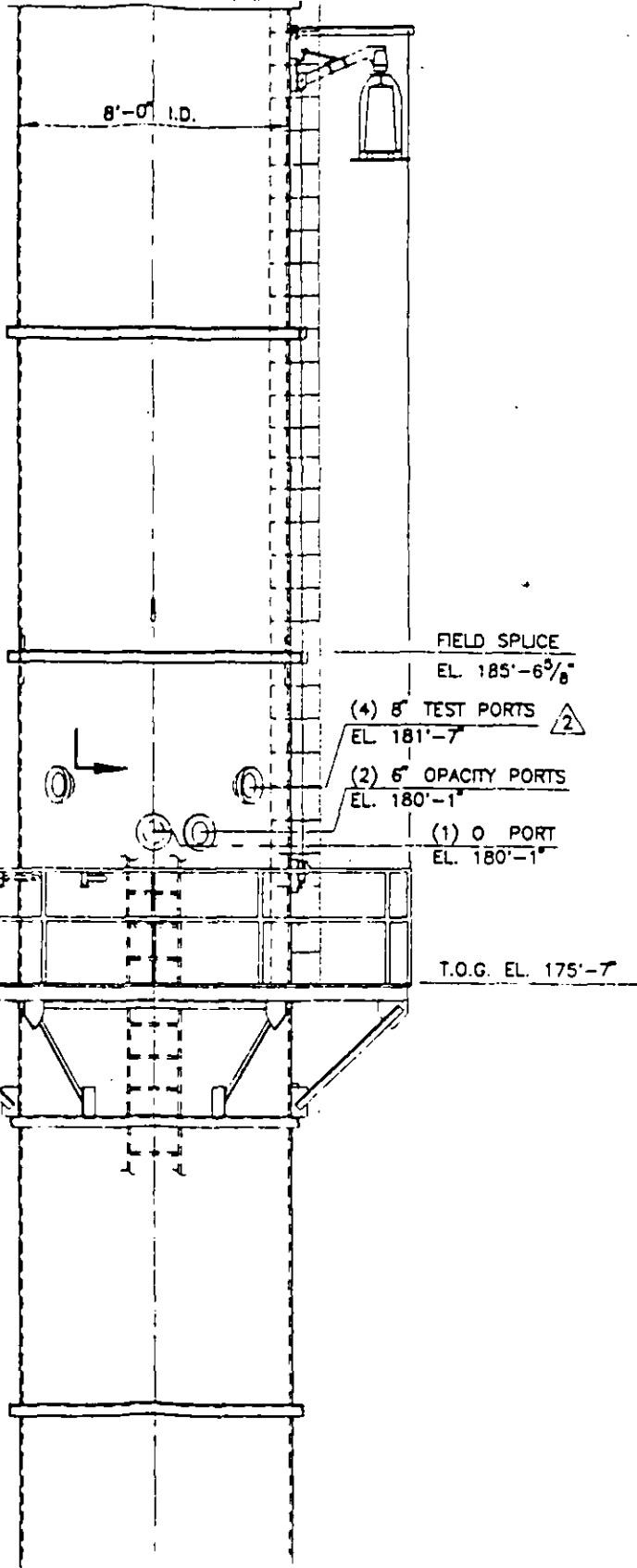
DOOR (FAR SIDE)
3/8"

MINUTES 2

ACK
3/8"

EAST STACK (AS SHOWN)
CENTER STACK (NO LIGHTS)
WEST STACK (LIGHT & TOP LADDER OPP. HAND)
ELEVATION
SCALE: 1/4" = 1'-0"

ION #3 30'-11³/₈" (WT. = 12,000 LBS.)



TEMP. TAP
EL. 179'-1"

1. PRESSURE TAP F.S.
2. EL. 179'-1"

FIELD SPLICE
EL. 185'-6⁵/₈"

(4) 6" TEST PORTS
EL. 181'-7"

(2) 6" OPACITY PORTS
EL. 180'-1"

(1) O PORT
EL. 180'-1"

T.O.G. EL. 175'-7"

SECTION #2 40'-0" (WT. = 12,000 LBS.)

110'-11³/₈" FROM BOTTOM OF STACK TO

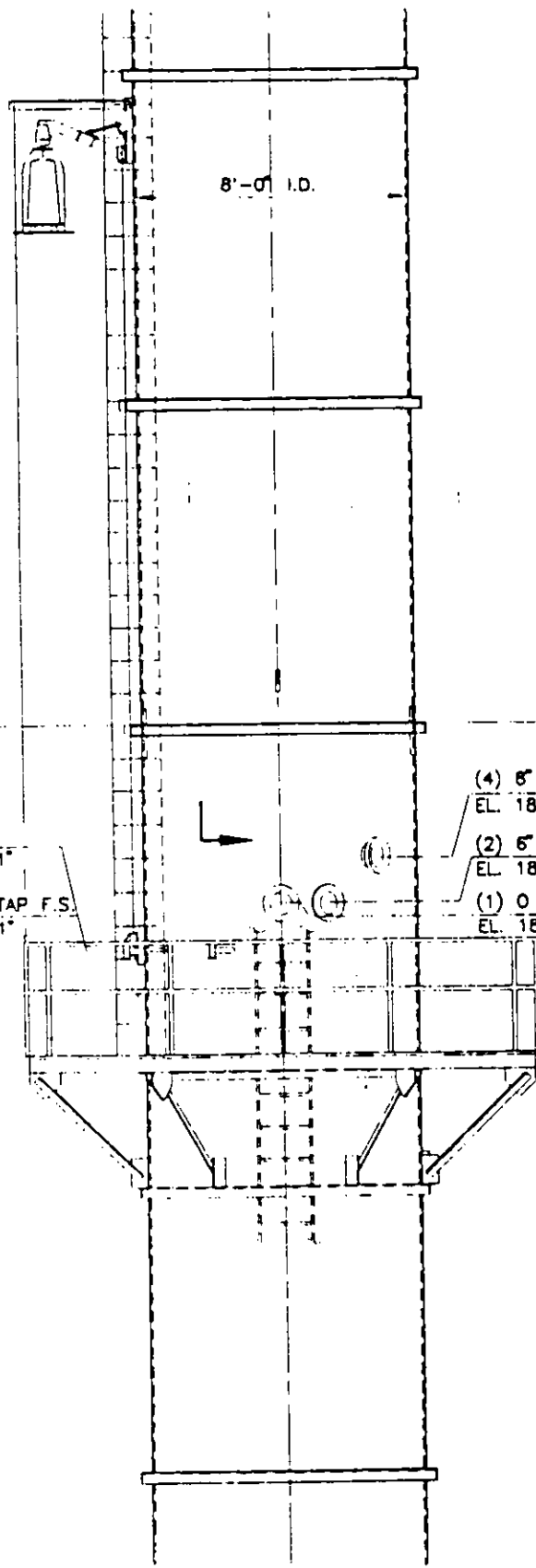
West
STACK

SECTION #3 30'-11 3/8" (WT. = 12,000 LBS.)

TE
EL
2
PF
EL

SECTION #2 40'-0" (WT. = 12,000 LBS.)

110'-11 3/8" FROM BOTTOM OF ST.



8'-0" I.D.

FIELD SPLICE
EL. 185'-6 5/8"

- (4) 8" TEST PORTS
EL. 181'-7"
- (2) 6" OPACITY PORTS
EL. 180'-1"
- (1) 0" PORT
EL. 180'-1"

T.O.G. EL. 175'-7"

SECTION #3 30'-11 3/8" (WT. = 12,000 LBS.)

TEMP. TAP
EL. 179'-1"

2 PRESSURE TAP F.S.
EL. 179'-1"

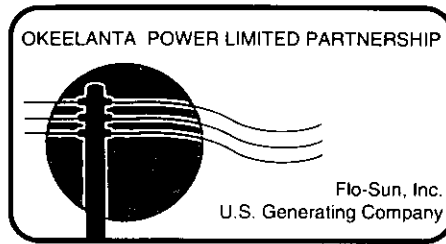
SECTION #2 40'-0" (WT. = 12,000 LBS.)

110'-11 3/8" FROM BOTTOM OF S

EAST STACK

0104709

0990332-001-AE



September 22, 1995

Clair Fancy
 Department of Environmental
 Protection
 Bureau of Air Regulation
 2600 Blair Stone Road, MS 5505
 Twin Towers Office Building
 Tallahassee, Florida 32399

1995 SEP 28 PM 12: 21
 MAIL ROOM

Re: Okeelanta Cogeneration Facility
 (PSD-FL-196; AC50-219413)

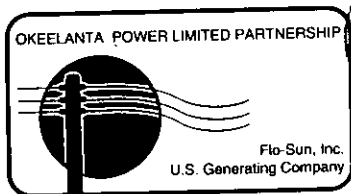
Dear Mr. Fancy:

Okeelanta Power Limited Partnership (OPLP) is sending you this letter to formally request an amendment to the PSD permit (PSD-FL-196; AC50-219413) that was issued by the Florida Department of Environmental Protection (FDEP) for the Okeelanta Cogeneration Facility (Facility). Over the years OPLP has worked closely with FDEP, the U. S. Environmental Protection Agency (EPA), and the other regulatory agencies to ensure that the construction and operation of its Facility will be in compliance with all of the applicable state and federal environmental regulations. In this spirit, OPLP now requests FDEP to amend the PSD permit for the Facility to ensure that OPLP is in compliance with the federal regulations contained in 40 C.F.R. 60, Subpart Ea.

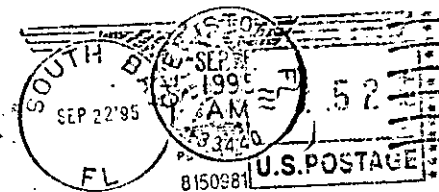
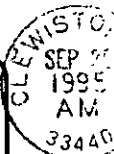
Subpart Ea applies to certain facilities that combust "municipal-type solid waste" (MSW), which is defined in Section 60.51a as "household, commercial/retail, and/or institutional waste." The definition of "municipal solid waste" in Subpart Ea and the Code of Federal Regulations does not expressly refer to leaves, tree limbs or similar vegetative materials. Nonetheless, in the 1991 Federal Register notice for Subpart Ea, EPA indicated that "municipal solid waste" includes "yard wastes." 56 Federal Register 5490 (February 11, 1991). Since Okeelanta's fuel supply may include some cellulose and vegetative materials collected from residential, retail, commercial or institutional facilities, it appears that Subpart Ea may apply to Okeelanta's Facility.

Under Subpart Ea, Section 60.51a, Okeelanta's Facility would be classified as a "cofired combustor", which is defined as

"a unit combusting MSW . . . with a non-MSW fuel and subject to a Federally enforceable permit limiting the unit to combusting a fuel feed stream, 30% or less of the weight of which is comprised, in aggregate, of MSW . . ."



P.O. BOX 117 SOUTH BAY, FL 33493



Clair Fancy
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS 5505
Twin Towers Office Building
Tallahassee, Florida 32399

Cofired combustors are subject to reporting and recordkeeping requirements, but are exempt from the other provisions of Subpart Ea. Section 60.50a (d). The initial report to FDEP from a cofired combustor must include "a copy of a Federally-enforceable permit limiting the maximum amount of MSW that may be combusted in the cofired combustor," expressed as a percentage of the aggregate fuel feed stream. Section 60.59a (a) (1).

The PSD permit for Okeelanta's Facility already contains many limitations on Okeelanta's fuel, including a prohibition on the use of garbage as fuel. However, there is no limitation on the percentage of "MSW" in the fuel, such as "yard wastes," or limbs, leaves; grass clippings, etc., from "household, commercial/retail and/or institutional" areas.

To ensure that Okeelanta's Facility is in compliance with Subpart Ea, FDEP should amend Okeelanta's PDS permit to include a specific limitation on the maximum amount of "MSW" that may be combusted. Specific Condition No. 12 of Okeelanta's PSD permit should be amended to include the following, underlined sentence:

"The primary fuel for the facility shall be biomass--bagasse and wood waste material. Authorized wood waste material is clean construction and demolition 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. In addition to the other restrictions contained in this paragraph, the fuel used at the cogeneration facility shall not contain more than 30% "municipal solid waste," as defined in 40 C.F.R. 60, Subpart Ea, 60.51a."

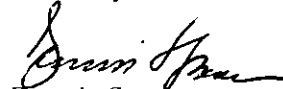
We believe the PSD permit should adopt the definition of MSW by reference. We do not wish to quote or paraphrase the current definition of MSW because, based on our discussions with EPA, it is our understanding that the current definition will be amended within the next two months. The amended definition of MSW will exclude "clean wood," regardless of where the wood was collected. Thus, clean wood collected at residential, retail, commercial or institutional facilities will not be defined as MSW and will not be subject to the 30% limitation for MSW in cofired combustors. If the current definition is expressly set forth in the PSD permit for OPLP, the PSD permit will need to be amended again, after the new MWC regulations are adopted by EPA in November.

In any event, OPLP's request for a permit amendment is intended only to address the requirements of Subpart Ea. At this time OPLP is not attempting to amend its plan of operation, the Facility's emission levels, or any of the substantive requirements concerning the Facility.

To ensure compliance with Section 60.59a of Subpart Ea, we want to use this opportunity to advise FDEP that OPLP will begin to burn "MSW" in the Facility on or about October 2, 1995. The Facility is expected to begin commercial operations in November 1995. The Facility will not use coal for the foreseeable future, but the Facility will use all of the other fuels approved in the PSD permit, including bagasse, wood from construction and demolition debris, and pallets. The Facility will burn "MSW," as defined in Subpart Ea, such as limbs, leaves, grass clippings, yard trash, and other vegetative materials collected from households, commercial/retail and/or institutional facilities. While OPLP cannot determine the precise percentage of "MSW" that will be in its fuel, OPLP will not utilize more than 30% MSW in its fuel feed stream. In order to demonstrate compliance with 40 C.F.R. 60.59a (b) (14), OPLP shall submit a revised "Wood-Waste and Ash Sampling Plan" within 60 days of receiving the amended permit.

In light of the information provided above, Okeelanta Power Limited Partnership respectfully requests the Department to amend its PSD permit in the manner proposed herein. As you requested, we have enclosed a check in the amount of \$50 to pay the FDEP fee for the permit amendment. Thank you for your cooperation and prompt assistance with this matter. If you have any questions please contact James Meriwether at (407) 993-1003.

Sincerely,



Dennis Space
Project Director

cc: J. Meriwether
D. Dee =>

David (904) 681 0311 Tallahassee.

bc: C. Staley
D. Schaberg
M. Griffin
M. Carney
S. Herman

OPLP File No. 6.3.1.5