



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 5, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Buff, P.E.
Principal Engineer
Golder Associates, Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

Dear Mr. Buff:

RE: Okeelanta Power L.P.
Permit No. AC50-219413 (PSD-FL-196)

This is in response to your January 17 and Okeelanta Power L.P. February 14 letters asking for clarification of or amendments to the referenced permit.

The burning of tire derived fuel (TDF) is authorized for testing purposes only. Because of the common fuel feed system, the Department will allow the burning of a blend of TDF in all boilers at the facility during the test on one of the boilers.

The Department has decided not to amend Specific Condition 4 of the permit. During the test, the ash should be analyzed for organics and PCDD/PCDF. The referenced air permit requires this analysis during the test burn only. Ash analysis requirements may be required in future permits issued by the Division of Waste Management.

Rule applicability for a permit to authorize the TDF blend to be burned on a regular basis will be based on the change from the estimated emissions in the original applications for this facility, including the emission of any new pollutant. If there is no increase in the emissions or new air pollutant emitted in significant quantities, the amendment to authorize routine burning of a blended fuel will not be subject to PSD regulations.

The Department wants the weekly fuel analysis required by Specific Condition No. 12 to continue at least through the TDF test burn. Once that data is available, we will consider reducing the frequency of analyze to a monthly basis. We advise you to resubmit the request to reduce the frequency of analysis with all analytical results collect to date at that time.

Mr. David A. Buff

March 5, 1997

Page Two

If you have any questions on these issues, please contact Willard Hanks at the Bureau of Air Regulation (904)488-1344 or Kathy Anderson at the Division of Waste Management (904) 488-0300.

Sincerely,



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

AAL/wh/t

cc: Dennis Space, Okeelanta Power L.P.
Ajaya Satyal, PBCHD
Kathy Anderson, DWM

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PS Form 3800, April 1995

**Wood-Waste and Ash
Inspection and Testing Plan**

Okeelanta Generating Plant

March 1995

**Prepared by
Okeelanta Power L. P.**

Okeelanta Generating Plant
6 Miles South of South Bay on U.S. Highway 27
South Bay, Florida 33493

Submitted to
Florida Department of Environmental Protection
Bureau of Air Regulation

**Okeelanta Power
Limited Partnership**

March 20, 1995

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Okeelanta Generating Plant
Permit #AC50-219413 PSD-FL-196

Dear Mr. Mitchell:

In accordance with Specific Condition #12 in the referenced permit, please find enclosed a copy of the Okeelanta Generating Plant: Wood-Waste and Ash Inspection and Testing Plan for your review and approval. The Okeelanta facility is currently under construction and is scheduled to begin commercial operation in October 1995.

Please direct all correspondence with regards to your review and approval of the plan to:

Ms. Michelle Griffin
Environmental Specialist
Okeelanta Power Limited Partnership
7500 Old Georgetown Road
Bethesda, MD 20814-6161

If you require any additional information please contact me at (301) 718-6766.

Sincerely,



Mark J. Burzinski
Environmental Representative

Enclosure Wood-Wastes and Ash Inspection and Testing Plan

**Wood-Waste and Ash
Inspection and Testing Plan**

Okeelanta Generating Plant

March 1995

**Prepared by
Okeelanta Power L. P.**

Okeelanta Generating Plant
6 Miles South of South Bay on U.S. Highway 27
South Bay, Florida 33493

Submitted to
Florida Department of Environmental Protection
Bureau of Air Regulation

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Bechtel Drawing 22433-M-031-0140-02; "Fuel Handling System Flow Diagram"

Bechtel Drawings 22433-M73-JN-001 and 22433-M73-JM-001; "Fly Ash and Bottom Ash Handling System Flow Diagrams"

1.0 INTRODUCTION

The Okeelanta Power, L.P. (OPLP) is constructing a bagasse/wood-waste fired cogeneration plant, known as the Okeelanta Generating Plant (OGP), adjacent to the site of the Okeelanta Sugar Mill. The OGP is located approximately six miles south of the town of South Bay in Palm Beach County, Florida

As a provision of the OGP's Florida Department of Environmental Protection (FDEP) Air Permit (AC50-219413, PSD-FL-196), the plant is required to implement inspection and testing procedures for the wood-waste and other materials delivered to the plant for fuel. The primary function of these procedures is to keep painted and chemically-treated wood, household garbage, toxic or hazardous non-biomass, and non-combustible waste material from being burned at the plant. In addition, the FDEP Air Permit also requires the sampling and analysis of ash from the biomass burned in order to determine the concentration of copper, chromium, and arsenic present. This Wood-Waste and Ash Inspection and Testing Plan describes the implementation of these procedures during operation of the OGP to ensure compliance with the sampling and analysis provisions outlined in the air permit.

The Plan includes a brief description of the OGP and its operations related to wood-waste and ash handling in Sections 2.0 and 3.0. Procedures for inspection, sampling, and analysis of the wood-waste at both the wood-waste supply sites and at the OGP, as well as procedures for ash sampling and analysis are described in Section 4.0. The OGP procedures for recordkeeping of inspections, sampling, and analysis results are provided in Section 5.0. Drawings for the fuel and ash handling systems, showing inspection (wood-waste only) and sampling locations are provided in the appendix.

2.0 FACILITY INFORMATION

The Okeelanta Generating Plant (OGP) is a new 74.9 MW (gross) bagasse and wood-waste fired cogeneration plant located in South Bay, Florida, adjacent to the existing Okeelanta Sugar Mill. The plant is designed to supply high and low pressure steam to the Okeelanta Sugar Mill during the grinding season (mid-October to April) while burning bagasse as the primary fuel. During the non-grinding season the OGP is designed to provide low pressure steam while using processed wood-waste as the primary fuel. Steam generation will be accomplished by means of bagasse and wood-waste fired non-reheat boilers. Electrical power generation will be provided by means of an extraction-condensing turbine generator and will be used to meet in-house loads and for sale to Florida Power & Light.

The major components of the plant include:

- three balanced draft bagasse/wood-fired boilers with membrane wall construction, superheater, and economizer (boilers are also capable of future coal firing up to 40% of rated heat input)
- three electrostatic precipitators (one/boiler) with integral stacks
- an extraction-condensing turbine generator
- material storage and handling systems (e.g., wood-waste, bagasse, ash)
- ancillary plant equipment.

3.0 PROCESS DESCRIPTIONS

The following sub-sections describe the OGP wood-waste and ash handling systems from a "process flow" standpoint. Although the OGP also includes a bagasse handling system which operates during the sugar cane grinding season, only the wood-waste and ash are subject to the sampling and analysis requirements of the OGP air permit. Therefore, only these systems are described in this plan.

3.1 Wood-Waste Handling System

The following description of the Wood-Waste Handling System is depicted schematically on the wood-waste/bagasse flow diagram (Bechtel Drawing #22433-M-031-0140-02) contained in the appendix.

Wood-waste will be delivered to the OGP by 25-ton trucks (typical) at an approximate design rate of 1,200 tons per day, with deliveries anticipated 12 hours per day, 6 days per week. The trucks will be unloaded at the OGP utilizing two hydraulically operated truck dumpers. A third unloading area will also be provided to accommodate any self-unloading trucks that may be available for fuel transportation.

While unloading from the trucks, the wood-waste will be discharged into receiving hoppers equipped with live bottom chain conveyors which will transfer the wood material to the 48" Unloading Conveyor. The Unloading Conveyor, which is equipped with a belt scale and magnetic separator, will convey the wood-waste to the Screen and Hog Tower at a design rate of up to 300 tons per hour (tph).

The Screen and Hog Tower is an open facility consisting of a disc screen and a motor-driven, size-reducing hog. The wood-waste will be discharged onto the disc screen which acts to separate material sized less than 3" from any oversized material. The oversized material (i.e., >3") is discharged to the Hog which reduces the wood pieces to the less than 3" size, suitable for feeding into the boilers.

The sized wood-waste is transferred from the Screen and Hog Tower via the Storage Conveyor to the Radial Stacker Conveyor which deposits the sized wood-waste at the wood storage area.

Sized wood-waste is reclaimed from the wood pile at a design rate of up to 175 tph through the use of two under-pile chain reclaimers. The reclaimers transfer the sized wood-waste to the Boiler Feed Conveyor which deposits the fuel on to one of two chain distribution conveyors for apportionment into the boilers.

3.2 Ash Handling Systems

The ash handling systems at the OGP comprises equipment from two distinct systems, (1) the handling of bottom ash from the boilers, and (2) the handling of fly ash collected in the electrostatic precipitators (ESP), the dust collector hoppers and the air heater hoppers. Therefore, the following two sub-sections provide separate discussions of both the equipment related to bottom ash handling and the equipment for fly ash handling. A process flow diagram of these ash handling systems is also provided in the appendix to this plan (Bechtel Drawings #22433 M73-JN-001 and #22433 M73-JM-001).

3.2.1 Bottom Ash Handling

Bottom ash will be continuously discharged from the boilers into three water-submerged drag chain conveyors. Each conveyor will consist of a wet compartment and a dry lower compartment. The upper compartment will be a water-tight steel trough designed to contain the water required for quenching and cooling the bottom ash to 140° F. The trough will be sized to accommodate up to two hours of bottom ash generated from the combustion of wood-waste (or bagasse).

The dewatered ash from the dewatering inclined ramp of the chain conveyor will be discharged into an 8 tph transfer conveyor from each individual boiler which will then transfer the dewatered ash into a 25-tph collecting conveyor. The collecting conveyor will unload the ash into a three-sided bunker, sized to a capacity of approximately 1-day of normal ash generation. Mobile equipment will be used to reclaim and load the stored ash into trucks for disposal off site.

3.2.2 Fly Ash Handling

Fly ash at the OGP will include ash collected in the air heater hoppers, dust collector hoppers and from the ESP hoppers. The fly ash handling system will encompass the removal and transport of the fly ash from the hoppers to a storage silo using a dry chain conveyor and bucket elevator conveyor system.

The fly ash collected from the air heaters and ESPs will discharge via enclosed chutes to the collecting fly ash chain conveyor. The collecting conveyor transfers the ash to the bucket elevator conveyor, which in turn carries the ash up to the flight chain conveyor. The flight conveyor discharges the fly ash into the top of the ash storage silo. The conveying capacity of this system will be sufficient to remove 24-hours of ash generation in 6 to 8 hours of operation.

The ash storage silo will be sized to accommodate 1,500 tons (approximately 7 days of ash generation) of fly ash. The silo will be a conical-bottom cylinder-type carbon steel structure. Two

twin shaft pug-mill conditioner unloaders, rated at 200 tph each, will discharge the ash into trucks for disposal.

4.0 INSPECTION, SAMPLING, AND ANALYSIS PROCEDURES

As stated in Section 1.0, the FDEP Air Permit for the OGP requires that inspection, sampling, and analysis of the wood-waste burned, and sampling and analysis of the ash generated at the plant, be performed to demonstrate that contaminants, principally copper, chromium, arsenic, in the biomass burned in the boilers are minimized.

The specific inspection and sampling procedures to be utilized at each stage of the wood-waste and ash handling systems are provided in the following sub-sections.

4.1 Wood-Waste Supply Sites

As stipulated in the OGP fuel supply contracts with the wood-waste suppliers, the delivered wood-waste must meet the following specifications:

- Composed of less than 2% by volume or weight of plastics, rubber, glass, and painted wood.
- Free from chemically treated wood (e.g., chromium, copper, arsenic, creosote, pentachlorophenol) except for incidental amounts not to exceed 2% by volume or weight.

To ensure that wood-waste delivered to the OGP meets these and other specifications, the wood waste suppliers will perform inspection and material segregation operations on each load of feedstock received at their facilities. Although the OGP will obtain wood-waste fuel from several different suppliers with a variety of sources for their unprocessed feedstock, the following description of the inspection and material segregation operations are typical of those operations performed at wood yards supplying the OGP.

The bulk material feedstock at the originating wood yards will first undergo a "gross" material separation by removing the bulk wood-waste from other mixed wastes (e.g., plastics, non-wood debris, scrap metal, concrete/soils) through the use of heavy equipment, magnetic separation, and mechanical screening. Trained personnel will be involved in oversight at this level of material segregation such that the majority of prohibited wastes are removed from the bulk wood-waste. After this operation, the wood-waste will be further visually inspected and manually sorted (when applicable) to remove chemically-treated and painted wood, smaller mixed wastes, and other non-combustible materials. The "sorted" wood-waste is then mechanically sized and screened (to actual contract specifications) prior to delivery to the OGP site.

As a quality assurance measure, each fuel supplier's operations will be reviewed at least once monthly through an unannounced site inspection by OGP personnel. These visits will allow OGP to ensure that the supplier's inspection and segregation efforts remain at acceptable levels.

4.2 OGP Wood Yard Storage

In accordance with the FDEP Air Permit, analysis of wood-waste to be burned at the plant will be conducted on a weekly basis for the first year of operation at the OGP. Thereafter, upon approval of FDEP, sampling and analysis may be reduced to a monthly basis.

Upon delivery of the wood-waste to the OGP, each load will be visually inspected by the Fuel/Ash Handler stationed at the truck receiving dumping area. Loads which contain unacceptable, visible amounts (i.e., greater than fuel contract specified limits) of chemically treated and/or painted wood and other prohibited mixed wastes will be rejected by the inspector and prevented from discharging at the OGP fuel storage area. If the delivered load is acceptable based on the visual inspection, the truck will be staged for unloading.

Sampling of the wood-waste will occur at the OGP fuel storage yard. Representative samples will be taken from specified sections of the wood-waste pile which represent and include the fuel to be reclaimed and burned during the following week of plant operation. These "weekly" sections, and their schedule for reclamation and burning, will be identified and approved by the Plant Manager (or designee) prior to samples being taken.

A total of three grab samples will be taken from different areas and depths at the specified "weekly" section of the fuel pile. Each grab sample will be approximately one pound and will be stored in sealable plastic (ziplock-type) bags.

Prior to releasing the samples for outside lab analysis, a "composite sample" will be produced by combining the three individual grab samples into a homogeneous mixture and cutting out a single sample from the mixture as specified by the lab performing the analyses. This "composite sample" will represent the composition of the wood-waste to be burned during the following week of plant operations. The remaining portion of the homogenous mixture will be retained onsite for use as a control sample to verify lab test results, if necessary.

Laboratory results on the samples will typically be available to the OGP Fuels Manager within 2-3 days of receipt of the sample at the lab. Any results which indicate contamination of the wood-waste in the "weekly" section of the pile by copper, chromium, and/or arsenic in concentrations above the air permit-specified limits (i.e., 62.8 ppm copper, 83.3 ppm chromium, and 70.7 ppm arsenic) will be immediately investigated by the onsite Environmental, Health and Safety Representative (EH&S). The "weekly" section of the pile tested will not be burned until additional testing of the control sample is undertaken to verify the original test results. If necessary, additional sampling/testing will be performed to determine the extent of contaminated wood-waste in the "weekly" section of the fuel pile.

4.3 Bottom Ash/Fly Ash

In accordance with the FDEP Air Permit, analysis of the ash generated at the OGP will be conducted on a monthly basis for the first year of operation. Results from the analyses will be used to confirm that the air permit-specified limits on the concentration of copper, chromium, and arsenic in the biomass combusted at the OGP are being met. Ash samples to be analyzed will be a mixed product of both bottom ash and fly ash collected from the three boilers and the air heater, dust collector, and ESP hoppers, respectively.

Grab samples of the bottom ash will be obtained weekly by the Plant Chemist as material is loaded from the storage bunker to trucks for offsite disposal. Fly ash grab samples will be obtained (also by the Plant Chemist) weekly from the transfer point between the collecting fly ash chain conveyor and the bucket elevator conveyor, as ash is loaded into the silo. The individual sample size for the bottom ash and fly ash grab samples will be approximately one pound each.

Prior to releasing the ash samples for outside lab analysis, a "representative monthly ash sample" for the facility will be produced by combining the individual weekly bottom and fly ash samples (approximately 8, 1 lb samples per month) into a homogeneous composite ash sample. From this composite sample, a single ash sample representing the ash from the biomass burned during that month will be selected for lab analysis of the copper, chromium and arsenic concentrations. A portion of the remaining homogeneous composite ash sample will be retained on site as a control sample for verification of lab test results, if necessary.

As stated in the air permit, the monthly ash samples will be analyzed for copper, chromium, and arsenic in accordance with appropriate analytical procedures per 40 CFR 261, Appendix III, described in SW-846, *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*. Laboratory results on the sample will typically be available to the OGP Fuels Manager within 2-3 days after receipt of the sample at the lab.

Any results on the representative monthly composite ash sample which indicate the burning of wood-waste with concentrations of copper, chromium and/or arsenic above of the air permit limits will be investigated by the EH&S Representative. Re-testing of the control ash sample will be performed to verify the original lab test results. Comparison of the ash sample results with the corresponding fuel test results will also be performed to ensure that existing material segregation and sampling procedures for the wood-waste provide for an accurate representation of the composition of the wood-waste burned at the facility.

5.0 RECORDKEEPING

As required by the OGP air permit, results from the weekly wood-waste and monthly ash analyses will be included in the Stack Monitoring Reports submitted quarterly to FDEP's South and Southeast district Offices and the Palm Beach County Health Unit.

In addition, records on the various wood-waste inspections and wood-waste and ash sampling and analysis procedures outlined in this Plan will be maintained at the OGP for review on an as-requested basis by FDEP. The records will typically include:

- Fuel delivery information (e.g., supplier, time/date of delivery, type of material, delivery size)
- Written inspection reports (stating findings) of unannounced site visits to wood-waste suppliers to determine adequacy of their material segregation operations
- Wood-waste and ash sampling and analysis information (e.g., time/date of sampling, locations selected from the "weekly" sections, any atypical conditions, labs utilized, sample results).

These records may also be used by OGP personnel in investigating potential non-compliance events and verifying fuel and ash test results.

APPENDIX



FACSIMILE COVER SHEET

RECEIVED

DATE: 11-29-96

DEC 2 1996

TO: Willard Hanks

BUREAU OF AIR REGULATION

ORGANIZATION: Florida DEP

FAX NUMBER: 904-922-6979

TELEPHONE NUMBER: 904-488-8730

FROM: David Buff

OFFICE: Gainesville
 Washington D.C.

Tampa
 Jacksonville

Boca Raton

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Tampa, FL 33607
(813) 287-1717/FAX (813) 287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, FL 33487
(407) 994-9910/FAX (407) 994-9393

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7785 Baymeadows Way, Suite 105
Jacksonville, FL 32256
(904) 739-5600/FAX (904) 739-7777

MEMORANDUM

TO: Willard Hanks, FDEP

FROM: David Buff, KBN/Golder *DAB*

DATE: November 26, 1996

RE: TDF Trial Burn Permit; OkPLP; OsPLP

Willard - I have reviewed draft trial burn permit, and have received comments from James Meriwether of OkPLP. The following comments are offered for your consideration.

Cover letter, 2nd para. - the wording concerning the time period for testing should read the same as Specific Condition (SC) 2: "for a period not to exceed 60 calendar days, and within 90 days, from the first day TDF is burned in the boiler."

SC 2 - Reword as "The maximum TDF content of the fuel shall not exceed 25 percent by weight. Performance testing shall be conducted within 60 calendar days..."

SC 3 - This condition should be clear that TDF firing should be compared to limits for coal in the permit: "Stack emissions due to TDF firing shall not exceed any limit for coal burning in the construction permit..."

SC 4 - Does the Department want total metals analysis or TCLP analysis on the bottom ash and fly ash? SC 5 would indicate that a total metals analysis is necessary. Is TCLP required as well?

SC 6 - This condition should also refer to Osceola cogeneration plant, in case this plant is tested - 23,871 lb/hr or 25 percent by weight of the total feed rate.

SC 11 - Please note that, depending on when actual TDF testing is conducted, the July 1, 1997 deadline may need to be extended. However, I believe the construction permit is automatically extended until issuance of the Title V permit (assuming such issuance has not occurred prior to July 1, 1997).

SC 13 - The purpose of this request should be stated. Is this to determine if a new PSD permit is required? Would this be based on the changes in allowable emissions due to TDF firing, if any changes are necessary? As long as the current allowable emissions are not exceeded due to TDF firing, then PSD review should not be required.

SC 16 - Reword as "... 60 calendar days.."

Memorandum
November 26, 1996
Page 2

SC 17 - Immediate notification could be subject to interpretation. Suggest allowing 5 days for notification.

SC 18 - Suggest reword as "...include emissions tests at the maximum practical TDF blend (not to exceed 25 percent by weight)..."

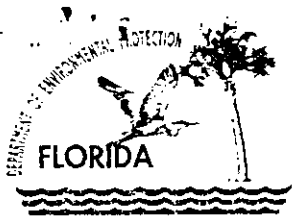
SC 19 - The pollutants to be tested were already specified in SC 7 and 8. Suggest reword as "A test protocol, specifying the pollutants to be tested and the sampling and analysis methods, including fuel and ash, shall be submitted to the Department and approved prior to commencement of testing. The protocol..."

Ending Sentence - This sentence should also refer to Permit No. PSD-FL-197C in the event that testing is performed at Osceola Power.

Public Notice - In the first sentence of the first paragraph, revise to state "...with bagasse and/or wood wastes..."

Please call me if you want to discuss any of these suggestions.

cc: File (2)



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 16, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dennis Space
General Manager
Okeelanta Power Limited Partnership
Post Office Box 8
South Bay, Florida 33493

Re: Okeelanta Power Limited Partnership
Tire Derived Fuel Permit Amendment
Permit File No. AC50-219413, PSD-FL-196A

Dear Mr. Space:

The Department has received the responses to our incompleteness letter for incorporating the use of Tire Derived Fuel (TDF) as a supplemental fuel at Okeelanta Power in Palm Beach County. Based on our review of the responses, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. Attached are concerns raised by the Bureau of Solid and Hazardous waste pertaining to air and ash issues. Please respond to their concerns. If there are any questions on these issues, please contact Kathy Anderson at (904) 488-0300.
2. As stated in your response, compliance testing on all three boilers was performed during the month of May 1996. Did the test show compliance with all permit requirements for criteria and non-criteria pollutants? Please submit a summary of the test results.
3. The corrected application pages submitted with the response indicates maximum TDF input for each boiler to be 40.4 percent on a weight basis. The original application stated TDF input to be 25 percent on a weight and short-term basis. Please explain the discrepancy between the two numbers.

Mr. Dennis Space
Page Two
August 16, 1996

The Department will resume processing this application after we receive the requested information. Should you have any questions, please contact Syed Arif at 904-488-1344.

Sincerely,

Willard Santos
for

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

AAI/sa/t

cc: D. Knowles, SD
J. Koerner, PBCHU
K. Anderson, DEP
J. Harper, EPA
J. Bunyak, NPS
D. Buff, KBN

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 Okeelanta Power, LP
 P O Box 8
 South Bay, FL 33493

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 P 339 251 141

4b. Service Type
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Florida Department of
Environmental Protection

Memorandum

TO: Syed Arif

FROM: Kathy Anderson, Solid Waste Section *SKA 8/12/96*

DATE: August 12, 1996

SUBJECT: Osceola & Okeelanta Sugar Mill Cogeneration Facility
Tire Derived Fuel Permit Amendment

I have reviewed the July 17, 1996 response that Okeelanta and Osceola had to your first RAI on Permit Amendment # AC50-269980. The following is a list of questions that I would like to see addressed pertaining to air and ash :

1. The current permit requires that the concentration of heavy metals be measured in the wood fuel prior to incineration and in the ash prior to disposal. Please provide mass balance calculations for heavy metals in the ash and wood fuel. For example, since the average concentration of arsenic is known in the fly ash, back calculate the concentration of arsenic in the wood fuel prior to incineration. How do the calculated numbers compare to the actual concentrations observed in the wood fuel ? Submit summary tables of actual data collected for heavy metals in ash and wood fuel to validate the use of average concentrations numbers used in the mass balance calculations.
2. Compare the calculated concentration of arsenic in the wood fuel with the <3% CCA treated wood by volume assumption used in the 5/2/96 Okeelanta submittal (see Table 2-11). Explain any significant differences.
3. Compare the calculated concentration of arsenic in the wood fuel with the <2.4% CCA treated wood by volume assumption used in the 4/18/95 Osceola submittal (see Table 2-9) ?
4. The TDF data presented is for TDF fuel only, what are that anticipated concentrations of heavy metals in the wood fuel combined with TDF ? What are the anticipated concentrations of heavy metals in the ash ? Please present mass balance calculations supporting the anticipated concentrations of heavy metals.

MEMORANDUM

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I have many more questions pertaining to ash that will be dealt with in the solid waste tire permit which is currently being processed in South District, but I felt like these questions pertained to air permit conditions and could be addressed through your RA1.

These question may have been addressed in the original application, if so please fax me a copy of the information. Additionally, please send me a copy of the portion of the facility's air permit that addresses the wood waste and TDF fuel being received and incinerated for each facility and the current ash handling requirements, i.e. wood waste sampling & storage requirements.