

Golder Associates Inc.

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January 21, 2002

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

BUREAU OF AIR REGULATION

Attention: Mr. Al Linero, P.E., Administrator

RE: NEW HOPE POWER PARTNERSHIP
OKEELANTA COGENERATION FACILITY
ARMS FACILITY ID NO. 0990332
PROJECT NO. 0990332-014-AC/PSD-FL-196M
APPLICATION TO MODIFY CO AND SO₂ EMISSIONS STANDARDS

Dear Mr. Linero:

New Hope Power Partnership (NHPP) has received the Department's draft permit for the Okeelanta Cogeneration Facility dated December 20, 2001. NHPP and its consultant, Golder Associates Inc. (Golder), has reviewed the draft permit and have developed some minor comments as a result of this review. These comments are provided below.

Technical Evaluation and Preliminary Determination

Page 6 – Table 4A: The future actual emissions of SO₂ should be shown as 345.0 TPY, and for SAM as 20.7 TPY. This will also change the "Net Change" column. Also, the value shown under the "PSD SER TPY" column should be revised to "7".

Page 10 – 7. Sulfur Dioxide (SO₂) Emissions, 2nd paragraph, line 10: change "form 1154 to 402" to "from 1154 to 345".

Page 14 – 11. Lead Emissions: It was requested that the permittee be allowed to average the lead test results from all three boilers to demonstrate compliance with the 1.5E-04 lb/MMBtu limit. This was requested due to the extremely low levels of these standards, and the variability in the results because of these low levels. This request was not addressed in the TE&PD.

page 15 – 12. Mercury Emissions: It was requested that the permittee be allowed to average the mercury test results from all three boilers to demonstrate compliance with the 5.4E-06 lb/MMBtu limit. This was requested due to the extremely low levels of these standards, and the variability in the results because of these low levels. This request was not addressed in the TE&PD.

Draft Permit

Page 5, Construction Details

5. NHPP has completed installation of the natural gas burners on two of the cogen boilers. Each boiler has a total of four burners, one located in each corner of the boiler. The total heat input rating

for all four burners is 400 MMBtu/hr (this is lower than the 600 MMBtu/hr that was in the permit application). Natural gas burners will be installed in the third cogen boiler in an identical fashion.

Page 7, 11.a: The Methods 3050/6010 stated are EPA Method SW-846 methods. It is unknown if they are also ASTM methods.

Page 11, 19.d: The last sentence of this condition requires annual emissions for each event per year. Annual emissions cannot be provided on a per event basis. It should be revised to require annual emissions for **all such** events per year.

Page D-1, Final BACT Determination: Under Sulfur Dioxide, the 24-hour average is referred to as a "block" average. This should be a "rolling" average.

Page E-1, Continuous Monitor Requirements: 1.b – Biomass feed rates are determined directly by weigh scales on the conveyor belts, not by fuel heating values. In addition, the current Title V permit, under "Compliance Demonstrations and Periodic Monitoring" for the cogen boilers, requires that:

The permittee shall continuously monitor the fuel input rate based on the fuel flow monitors calculating the maximum heat input rate (24 hour average) for each fuel during each day of operation. (see condition I.12.b of the Title V permit)

We request that the construction permit condition be revised to reflect this same level of monitoring. Requiring tracking of hourly heat input values would be very onerous.

Thank you for your consideration of these comments in issuing the final permit. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/jkw

cc: Gus Cepero
James Meriwether
David Dee
Bill Tarr

NEW HOPE POWER PARTNERSHIP
OKEELANTA COGENERATION PLANT
P.O. BOX 9
8001 HWY 27 S.
SOUTH BAY, FLORIDA 33493
OFFICE (561) 993-1000 FAX (561) 992-7744

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BUREAU OF AIR REGULATION

January 3, 2002

Department of Environmental Protection
New Source Review Section
Twin Towers Office Building
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

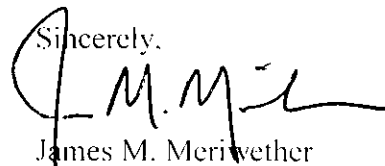
Attn: Jeffrey Koerner

Re: Proof of Publication
New Hope Power Partnership
Okeelanta Cogeneration Plant

Dear Mr. Koerner:

Attached is the Proof of Publication from The Palm Beach Post certifying that The Public Notice of Intent to Issue PSD Air Permit Modification, Project No. 0990332-014-AC, Draft Permit PSD-FL-196M, was published on December 29, 2001. If you have any questions please contact me at (561) 993-1003.

Sincerely,



James M. Meriwether
Environmental and Safety Manager

cc: Bill Tarr

David Dee

C. Holladay

J. Stormer, PB County

D. Kavulko, SD

S. Wally, EPA

J. Banzal, NPS

THE PALM BEACH POST

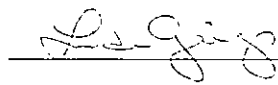
Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared **Linda Goings**, who on oath says that she is **Classified Advertising Manager, Real Estate** of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being **Notice** in the matter **Intent to Issue** established in said newspaper in the issues **December 29, 2001**

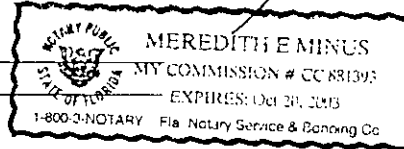
Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at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



Sworn to and subscribed before this 31st day of December, A.D. 2001



Personally known XX or Produced Identification _____
Type of Identification Produced _____



NO. 5929705
PUBLIC NOTICE OF INTENT
TO ISSUE PSD AIR
CONSTRUCTION PERMIT
MODIFICATION
STATE OF FLORIDA
DEPARTMENT
OF ENVIRONMENTAL
PROTECTION
Project No. 0990332-014-AC
Draft Permit PSD-FL-196M
New Hope Power Partnership -
Okeelanta
Cogeneration Plant

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to the applicant, New Hope Power Partnership. The applicant operates an existing cogeneration plant that is located approximately six miles south of South Bay on U.S. Highway 27 in Palm Beach County, Florida. The Okeelanta Cogeneration Plant's authorized representative is Mr. Rodney Williams, Plant Manager, and the mailing address is 8001 U.S. Highway 27 South, South Bay, FL 33493.

Based on the applicant's requests, the draft permit includes changes to the current emissions standards and monitoring requirements for carbon monoxide, sulfur dioxide, sulfuric acid mist, beryllium, fluoride, lead, and mercury. The proposed changes represent better information now available for biomass fuel, which consists of bagasse from the adjacent sugar mill and wood material from the surrounding areas. In addition, coal will be removed as an authorized fuel.

The cogeneration boilers are considered utility steam electrical generating units. As such, the applicant predicts that future actual emissions from this project will not result in actual emissions increases for beryllium, fluorides, lead or mercury that would exceed the PSD significant emission rates. The project does represent potential significant net emissions increases of the following pollutants: carbon monoxide (486 tons per year), sulfuric acid mist (27 tons per year), and sulfur dioxide (486 tons per year). However, it is noted that potential allowable emissions will remain the same for carbon monoxide; will be reduced from 35 to 21 tons per year for sulfuric acid mist; and will be reduced from 1154 to 345 tons per year for sulfur dioxide. The reductions are due to the absence of coal firing. Therefore, in accordance with Rule 62-212.400, F.A.C., the project is subject to PSD review for carbon monoxide, sulfuric acid mist, and sulfur dioxide.

The cogeneration boilers are fired primarily with wood materials and bagasse to provide steam for the adjacent sugar mill and refinery as well as generate electricity for sale to the electrical power grid. Auxiliary fuels are restricted to natural gas and very low sulfur distillate oil. The Department made the following determinations of the Best Available Control Technology (BACT) for this project. For emissions of sulfuric acid mist and sulfur dioxide, BACT was determined to be the firing of these very low sulfur fuels. For emissions of carbon monoxide, BACT was determined to be efficient combustion combined with good operating practices. The BACT standards for beryllium emissions were removed because beryllium is no longer subject to PSD review and because the primary source of beryllium was coal, which is no longer an authorized fuel. BACT for fluorides was also revised because the primary

source of fluorides was coal, which is no longer an authorized fuel. The draft permit also includes several miscellaneous changes to clarify the testing and monitoring requirements and updates the permit for previous modifications.

The Department reviewed the applicant's air quality analysis performed for carbon monoxide and sulfur dioxide. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted PSD Class II sulfur dioxide (SO₂) increment consumed by all sources in the area, including this project, will be as follows:

Pollutant	
SO ₂	
Averaging Period	
3-hour	
24-hour	
Annual	
Maximum Predicted Impacts (ug/m ³)	
54	
12	
0	
PSD Class II increment (ug/m ³)	
512	
91	
20	
Percent of Increment	
11%	
13%	
0%	

The Everglades National Park is the nearest PSD Class I area to the project. The maximum 24-hour SO₂ increment in the Everglades National Park consumed by all sources, including this project, is predicted to be 3.5 ug/m³, which represents 70% of the allowable PSD Class I increment of 5 ug/m³.

The Department will issue the Final Permit with the proposed conditions unless a response received in accordance with the following procedures results in a *different decision or significant change of terms or conditions*. The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a

petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

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

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

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
New Source Review Section
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida 32301
Telephone: 850/488-0114
Dept. of Environmental Protection
South District Office
Air Resources Section
2295 Victoria Avenue,
Suite 364
Fort Myers, Florida
33901-3381
Telephone: 941/332-6975
Palm Beach County
Health Dept.
Environmental Health and Engineering/Air Pollution Control Section
901 Evernia Street
West Palm Beach,
Florida 33401
Telephone: 561/355-3136
The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's project engineer for additional information at the address and phone numbers listed above.
PUB: The Palm Beach Post
December 29, 2001