

New Hope Power Partnership

Okeelanta Cogeneration Plant

P.O. Box 9
South Bay, FL 33493

Telephone (561)993-1010
Fax (561)992-7744

RECEIVED

OCT 06 2003

BUREAU OF AIR REGULATION

October 1, 2003

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

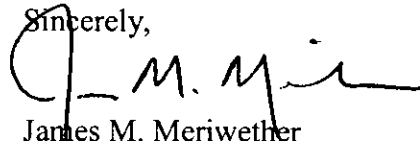
Attn: Jeff Koerner

Re: Project No. 0990332-016-AC
Draft Air Permit No. PSD-FL-196(O)
New Hope Power Partnership, Okeelanta Cogeneration Plant
Proof of Publication

Dear Mr. Koerner:

Please see the attached Proof of Publication for the above referenced modification of the Okeelanta Cogeneration Plant Air Construction Permit. The Public Notice of Intent was published in the Palm Beach Post on September 24, 2003. If you have any questions please contact me at (561) 993-1003.

Sincerely,



James M. Meriwether
Environmental and Safety Manager

cc: Rodney Williams
Gus Cepero
Bill Tarr
David Buff
Ken Kosky
David Dee
C. Mallada
R. Blackburn SD
J. Danner PSC HD
B. Worley EPA
Q. Bunnick NPS

THE PALM BEACH POST
Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

NO. 7608915
PUBLIC NOTICE OF INTENT
TO ISSUE PERMIT
MODIFICATION OF PSD AIR
CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
Project No.
0990332-016-AC
Draft Permit No.
PSD-FL-196(O)
New Hope Power
Partnership -
Okeelanta Cogeneration
Plant

STATE OF FLORIDA
COUNTY OF PALM BEACH

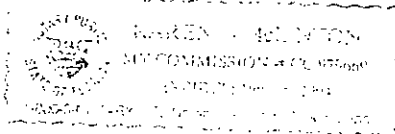
Before the undersigned authority personally appeared Tracey Diglio, who on oath says that she is Telephone Sales Supervisor of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being Notice in the matter of DEP #PSD-FL-196(O) was published in said newspaper in the issues of September 24, 2003. 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/her 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.

Tracey Diglio

Sworn to and subscribed before this 24th day of September, A.D. 2003

M. Anthony

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



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. The applicant, applied to the Department for a permit to authorize increases in the hourly and annual heat input rates for the existing boilers at the Okeelanta Cogeneration Plant. The maximum hourly heat input rate will increase from 715 to 760 MMBtu per hour by taking the last feedwater heater on each unit out of service to reduce the feedwater temperature. The increase in the hourly heat input rate is within the manufacturer's maximum continuous steam rating for these units. The cogeneration plant's maximum potential annual heat input will increase from 11,500,000 to 19,970,000 MMBtu per year, which will relax a permit limit originally taken to avoid new source preconstruction review for several pollutants. The applicant requests the flexibility to operate the cogeneration units without synthetic operational restrictions. The applicant has notified the Department of possible future plans to add a new steam turbine-electrical generator, which would increase the electrical generating capacity of the plant from 74.9 MW to approximately 140 MW. Such a future request would require application and review in accordance the Florida Electrical Power Plant Siting Act in Sections 403.501-403.518 of the Florida Statutes. Approval of such a request would require a revision of the PSD air permit. The existing cogeneration plant is located in Palm Beach County, which is an area that is currently in attainment with (or designated as unclassifiable for) all pollutants subject to federal and state Ambient Air Quality Standards. The plant is a major facility with respect to the Prevention of Significant Deterioration (PSD) of Air Quality as defined in Rule 62-212.400, F.A.C. Based on the application, the project will result in the following potential increases in emissions in terms of "tons per year" (TPY): 2160 TPY of carbon monoxide (CO); 5 TPY of fluorides (F); 1.4 TPY of lead (Pb); 99 pounds per year of mercury (Hg); 741 TPY of nitrogen oxides (NOx); 18.1 TPY of particulate matter (PM/PM10); 20 TPY of sulfuric acid mist (SAM); 407 TPY of sulfur dioxide (SO2); and 555 TPY of volatile organic compounds (VOC). Emissions of CO, F, Pb, NOx, PM/PM10, SAM, SO2, and VOC exceed the PSD significant emission rates defined in Table 62-212.400-2, F.A.C. Therefore, the project is subject to PSD preconstruction review for these pollutants.

PSD preconstruction review requires the Department to establish emissions standards that represent the Best Available Control Technology (BACT) for each PSD-significant pollutant. Based on reasonable assurances provided by the applicant and other available information, the Department establishes emissions standards in the draft permit based on the following BACT-level controls: CO and VOC - boiler design and good combustion practices; NOx - selective non-catalytic reduction (SNCR); SO2 and SAM - low sulfur fuels; PM/PM10 - mechanical dust collectors followed by an electrostatic precipitator (ESP); F and Pb - authorized fuels containing only trace amounts of fluorides and with and prospective removal in the mechanical dust collectors/ESP.

As part of the PSD required preconstruction review, the Department reviewed the applicant's air quality analysis conducted for each PSD-significant pollutant. The analysis provides the Department with reasonable assurance that the project will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. A refined analysis was required to evaluate the 3-hour and 24-hour SO2 increments in the vicinity of the plant (Class II areas) and in the Everglades National Park (nearest PSD Class I area). The following table shows the maximum predicted for SO2 impacts and PSD increments consumed by all sources in the area, including the project.

PSD CLASS II INCREMENT ANALYSIS - VICINITY OF THE PLANT

Pollutant	Averaging Time	Maximum Predicted Impact (µg/m3)	Impact Greater than Allowable Increment?	Allowable Increment (µg/m3)	Percent of Increment
SO2	24-hr	62	No	91	68%
	3-hr	218	No	512	43%

PSD CLASS I INCREMENT ANALYSIS - EVERGLADES NATIONAL PARK

Pollutant	Averaging Time	Maximum Predicted Impact (µg/m3)	Impact Greater than Allowable Increment?	Allowable Increment (µg/m3)	Percent of Increment
SO2	24-hr	4.0	No	5	80%
	3-hr	12.2	No	25	49%

Based on the analyses, the Department has reasonable assurance that the proposed project will not significantly contribute to or cause a violation of any Class I or Class II PSD increments.

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 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 must be filed within fourteen (14) days of receipt of the 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 this Public Notice or within fourteen (14) days of receipt of the 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 Evemia 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
September 24, 2003