



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 18, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Rodney Williams, Plant Manager
New Hope Power Partnership
Okeelanta Cogeneration Plant
8001 U.S. Highway 27 South
South Bay, FL 33493

Re: Project No. 0990332-016-AC
Draft Air Permit No. PSD-FL-196(O)
New Hope Power Partnership, Okeelanta Cogeneration Plant
Increased Heat Input Rates – Revised Public Notice

Dear Mr. Williams:

On July 31, 2003, the Department issued a draft permit to increase the short term and long term heat input rates for the three existing boilers at the Okeelanta Cogeneration Plant. On August 19, 2003, we received a letter from your professional engineer of record (David Buff of Golder Associates Inc.) commenting and requesting changes to the draft permit. On August 19, 2003, New Hope Power Partnership informed the Department of possible future plans to add a new steam turbine-electrical generator, which would allow an additional 65 MW of steam-generated electrical power. As discussed, such a request requires application and review in accordance with the Florida Electrical Power Plant Siting Act in Sections 403.501-403.518 of the Florida Statutes. On September 4, 2003, the Department received a second letter from your professional engineer of record describing the possible future project to add new electrical generating capacity. Please be advised that approval of such a request would require a revision of the PSD air permit.

The Department requests that you publish the revised Public Notice of Intent to Issue Permit (Public Notice) as attached. The Public Notice must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Once the revised Public Notice is published, the Department will review your previously submitted comments and requests along with any comments received from other parties. If you have any questions, please contact A. A. Linero, Administrator of the New Source Review Section, at 850/921-9523 or Jeff Koerner, the project engineer, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

cc: Mr. James Meriwether, New Hope Power
Mr. David Buff, Golder Associates Inc.
Mr. James Stormer, PBCHD
Mr. Ron Blackburn, SD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, NPS

Enclosures

"More Protection, Less Process"

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**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

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 (Fl); 1.4 TPY of lead (Pb); 98 pounds per year of mercury (Hg); 741 TPY of nitrogen oxides (NOx); 181 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, Fl, 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); Fl 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 ($\mu\text{g}/\text{m}^3$)	Impact Greater than Allowable Increment?	Allowable Increment ($\mu\text{g}/\text{m}^3$)	Percent of Increment
SO ₂	24-hr	62	No	91	68%
	3-hr	218	No	512	43%

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PSD CLASS I INCREMENT ANALYSIS – EVERGLADES NATIONAL PARK					
Pollutant	Averaging Time	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	Impact Greater than Allowable Increment?	Allowable Increment ($\mu\text{g}/\text{m}^3$)	Percent of Increment
SO ₂	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:

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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.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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Sent To
 Rodney Williams
 Street, Apt. No.:
 or P.O. Box 9
 City, State, ZIP
 South Bay, FL 33493

PS Form 3800, January 2001 See Reverse for Instructions

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. Rodney Williams
 Plant Manager
 New Hope Power Partnership
 Okeelanta Cogeneration Plant
 Post Office Box 9
 South Bay, FL 33493

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) <i>Amanda Korman</i>	B. Date of Delivery 9-30-03
C. Signature <i>Amanda Korman</i>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	

3. Service Type
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2. 7001 0320 0001 3692 6105