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November 30, 2004

0337594

Florida Department of Environmental Protection
2600 Blair Stone Road, MS:48
Tallahassee, Florida 32399-30000

Attention: Mr. Hamilton S. Oven, Jr., P.E. Administrator, Siting Coordination Office

RE: New Hope Power Partnership Expansion Project
Okeelanta Cogeneration Facility
Power Plant Siting Application No. PA 04-46
DOAH Case No. 04-3209EPP; OGC Case No. 04-1594

Dear Mr. ^{Buck}Oven:

On behalf of New Hope Power Partnership (NHPP), please find enclosed responses to the insufficiency questions identified in FDEP's Notice of Insufficiency dated October 22, 2004. The responses address the questions asked by the FDEP Bureau of Air Regulation, New Source Review Section, the Florida Department of Transportation and the South Florida Water Management District. The sufficiency questions from each agency are included followed by the responses. Copies of these sufficiency responses are being distributed pursuant to the attached distribution list.

If you should be further questions regarding the SCA, please contact Mr. James Meriwether or myself. Mr. Meriwether is the Environmental and Safety Manager for NHPP and his contact information is on the Application Information page.

Sincerely,

GOLDER ASSOCIATES INC.

Kennard F. Kosky, P. E.
Principal

KFK/

Enclosures

cc: See Sufficiency Responses Distribution List

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BUREAU OF AIR REGULATION

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17. James Meriwether
New Hope Power Partnership
8001 Highway 27 South
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(1 copy)
18. Gus Cepero
Okeelanta Corporation
21250 U.S. Highway 27
South Bay, Florida 33493
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19. Matt Capone
Okeelanta Corporation
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20. Bill Tarr
Florida Crystals Corporation
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Total copies: 23

October 5, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gus Cepero, Chief Executive Officer
New Hope Power Partnership
8001 U.S. Highway 27 South
South Bay, FL 33493

Re: Request for Additional Information
Project No. 0990332-017-AC (PSD-FL-196P)
New Hope Power Partnership - Increased Generating Capacity

Dear Mr. Williams:

On September 3, 2004, the Department received your site certification application regarding increased electrical generating capacity at the New Hope Power cogeneration plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

FDEP

1. PSD Air Permit Application: Submit Sections I and II of the Department's air permit application (Form DEP Form No. 62-210.900(1)), which includes the signature page for the Authorized Representative and the P.E. certification. Also submit any pages in Section III (Emissions Unit Information) that are different from the application submitted for the project to increase the cogeneration plant's heat input or that will change as a result of this project.
2. PSD Review: The previous PSD permit modification increased the plant's maximum heat input rate to full capacity (8760 hours per year). However, it may not be possible for the plant to fully utilize this additional capacity without the current project to add new electrical generating capacity. In essence, the new project could potentially "de-bottleneck" the plant to fully take advantage of the previous PSD modification. Provide a discussion of why the proposed project does not trigger PSD preconstruction review.
3. NESHAP Subpart DDDDD: Please discuss the impacts of the recently published NESHAP Subpart DDDDD requirements on the existing cogeneration boilers. With regard to this regulation, is the project considered a "modification"? With regard to this regulation, is the project considered a "reconstruction"?
4. Annual Capacity Factor:
 - Please estimate the maximum *expected* annual annual capacity factor (in terms of heat input rate) for the cogeneration plant. What factors typically influence the operating rates of the cogeneration units? Will the units operate a reduced capacity at night during the cane-milling season as well as during the off-season? Does the available biomass fuel supply limit operation of the facility at capacity? Describe *expected* operation during the cane-milling season and during the off-season.
 - How many hours are planned for regularly scheduled down times to perform maintenance and inspections? Historically, how many additional hours of down time were needed to perform unscheduled maintenance and repairs?

New Hope Power Partnership
Request for Additional Information No. 1
Page 2 of 2

Project No. 0990332-017-AC
Increased Generating Capacity

5. Additional Fuel: From where will the additional biomass fuels come? Identify any sugar mills that are potential sources of bagasse. Is New Hope Power working on any preliminary contracts to obtain bagasse from any of the sugar mills? Will new contractors be needed to secure additional amounts of woods chips? Identify any new sources for the wood chips. Describe the fuel management program that will be used to ensure that only bagasse and clean, dry wood is fired in the cogeneration boilers. Will changes be made to the existing fuel management plan to ensure that foreign materials are not introduced? Identify all reasonable precautions that will be taken to prevent fugitive emissions from the storage and handling of the additional volumes of biomass.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

Jeffery F. Koerner
New Source Review Section

~~cc: Mr. James Meriwether, New Hope Power Partnership~~
Mr. David Buff, Golder Associates Inc.
Mr. Hamilton Owen, Siting Office
Mr. Ron Blackburn, SD
Mr. James Stormer, PBCHD
Ms. Jeanneane Gettle, EPA Region 4
Mr. John Bunyak, NPS

RESPONSE TO FDEP

**Response to Florida Department of Environmental Protection (FDEP), Bureau of Air
Regulation New Source Review Section Sufficiency Questions
Project No. 0990332-017-AC (PSD-FL-196p)
New Hope Power Partnership
Application No. PA 04-46; DOAH Case No. 04-3209EPP; OGC Case No. 04-1594**

FDEP Bureau of Air Regulation, New Source Review Section Questions: See attached letter from
Golder Associates Inc. dated November 17, 2004.

Golder Associates Inc.

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November 17, 2004

0337594-0700

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

Attention: Mr. Jeffery F. Koerner, P.E., New Source Review Section

RE: NEW HOPE POWER PARTNERSHIP - INCREASED GENERATING CAPACITY
DEP FILE NO. 0990332-017-AC (PSD-FL-196P)
REQUEST FOR ADDITIONAL INFORMATION

Dear Jeff:

This correspondence provides the additional information requested by the Florida Department of Environmental Protection (Department or FDEP) concerning the Site Certification Application (Application) that was filed by New Hope Power Partnership (NHPP) pursuant to the Florida Electrical Power Plant Siting Act (Siting Act or PPSA). This information is presented in the same sequence as the requested information in the Department's letter dated October 5, 2004.

FDEP AIR RAI #1, PSD Air Permit Application: Submit Sections I and II of the Department's air permit application [Form FDEP Form No. 62-210.900(1)], which includes the signature page for the Authorized Representative and the P.E. certification. Also submit any pages in Section III (Emissions Unit Information) that are different from the application submitted for the project to increase the cogeneration plant's heat input or that will change as a result of this project.

Additional Information: Attached are Sections I and II of FDEP Form No. 62-210.900(1), including the signature pages for the Authorized Representative and the P.E. certification. These sections are being submitted to change the description of the potential electrical generating capacity of NHPP's cogeneration facility (Facility).

As explained in the Site Certification Application, NHPP's proposed project does not require, and NHPP is not requesting, any changes in the operation conditions contained in the Air Construction Permit and PSD approval that was recently issued for the Facility [Project No. 0990332-016-AC; Air Permit No. PSD FL-196(O) issued October 29, 2003], with one exception -- i.e., NHPP wishes to delete the provisions in Specific Condition III.1 that restrict the electrical generating capacity of the Facility. The electrical generating capacity of the Facility will be reviewed and approved by the Governor and Cabinet (Siting Board) under the Siting Act. Thereafter, the Site Certification issued under the Siting Act will be the appropriate mechanism for regulating the electrical output of the



Facility. The Air Construction Permit will continue to govern the Facility's heat input and emissions rates, but the Air Construction Permit should not be used to regulate the Facility's electrical output, because the FDEP's Air Construction Permit and PSD program are designed to regulate airborne emissions, not electrical generating capacity. The Air Construction Permit should only mention the Facility's electrical generating capacity as part of the general project description (e.g., "nominal net capacity of 140 MW"), consistent with other air permits issued in Florida for electrical power plants. NHPP is not proposing any changes in the air emissions requirements for the Facility, so the Emissions Unit Information is not being changed in FDEP Form No. 62-210.900(1), with one exception. Page 14 of the Emissions Unit Information for each of the Facility's three cogeneration boilers will be changed to show that the Facility has a nominal net electrical generating capacity of 140 megawatts (MW).

FDEP AIR RAI #2, PSD Review: The previous PSD permit modification increased the plant's maximum heat input rate to full capacity (8760 hours per year). However, it may not be possible for the plant to fully utilize this additional capacity without the current project to add new electrical generating capacity. In essence, the new project could potentially "de-bottleneck" the plant to fully take advantage of the previous PSD modification. Provide a discussion of why the proposed project does not trigger PSD preconstruction review.

Additional Information: As described in the Site Certification Application, NHPP's proposed project may increase the Facility's annual electrical generation by approximately 150,000 to 190,000 megawatt-hours (MWH). Most of this electricity will be available during the months of April through September, when the demand for steam at the adjacent Okeelanta sugar mill is reduced (see SCA Section 1.1.3). As noted in the responses to FDEP AIR RAI #4 and #5, below, additional biomass fuels will be used to generate the additional electricity. However, as explained in the response to FDEP AIR RAI #1, above, NHPP is not requesting any changes to the applicable requirements in the recently issued Air Construction Permit for the Facility. Any additional fuel usage is already addressed in the Air Construction permit. NHPP is not proposing any changes in the Facility's permitted operating hours, emission limits, heat input rates, or the amount of steam that can be generated from the Facility's boilers. The only physical changes that will be made to the Facility are the addition of a steam turbine-generator and an associated heat dissipation system.

In 2002, NHPP filed its application for a PSD permit modification to increase the heat input at the Facility and also allowed year-round operation at full capacity. The increase in the annual heat input capacity of the Facility was needed at the time because the Facility had actually operated close to the annual heat input limitation in its permit. Although year-around operation at full capacity was not envisioned at the time, from a permitting perspective it was prudent to request such operation because the Facility was going through the time and expense of PSD review, and there was no compelling reason not to request full operation as new permit limits. On a short-term basis, NHPP had found through operational experience that the boiler could achieve somewhat higher heat input at times, and again it was prudent to request such a change in the PSD permitting process. Therefore, an increase in maximum and annual heat input limits was needed regardless of the installation of the new steam turbine. This recent PSD permit modification involved a complete PSD review including a determination of Best Available Control Technology (BACT) and an analysis of air quality impacts. The air quality impact analysis evaluated compliance with ambient air quality standards (AAQS) and PSD increments.

Federal and Florida rule allow the presumption that allowable or potential emissions of an emissions unit are equivalent to the actual emissions of the emission unit. FDEP Rule 62-210.200(11)(b), F.A.C., allows the Department to presume that unit-specific allowable emissions are equivalent to

the actual emissions, provided such allowable emissions are federally enforceable. Under FDEP Rule 62-210.200(11)(c), F.A.C., for any emissions unit that has not yet begun normal operations, actual emissions shall equal the potential emissions, provided such allowable emissions are federally enforceable. Emissions from "normal operations" usually are determined by reviewing a 2-year operating history. In the instant case, however, normal operations cannot be readily determined because the PSD approval for the Facility's full-capacity operations was issued only one year ago (October 2003) and, consequently, the Facility does not have a 2-year operating history at full capacity. Given these circumstances, the Department may rely on FDEP Rules 62-210.200(11)(b) and (c) to presume that the Facility's actual emissions are equal to the Facility's allowable emissions. In such a case, PSD review would not apply, since there would be no net increase in annual emissions for the proposed project.

Given FDEP's recent PSD approval for the Facility's operations at full capacity and the fact that no changes are being proposed in the recent Air Construction Permit, a new PSD review process would serve no purpose in this case. The requirements of a PSD review such as BACT and air quality impact analyses have already been recently conducted. The only new emissions unit is a cooling tower, which is such a small source that it is exempt from the FDEP's permitting requirements. The maximum amount of PM and PM₁₀ in the drift from the cooling tower will be so small that the cooling tower is exempt from permitting pursuant to FDEP Rule 62-210.300(3), F.A.C.

FDEP AIR RAI #3, NESHAP Subpart DDDDD: Please discuss the impacts of the recently published NESHAP Subpart DDDDD requirements on the existing cogeneration boilers. With regard to this regulation, is the project considered a "modification"? With regard to this regulation, is the project considered a "reconstruction"?

Additional Information: Under EPA's new NESHAP for industrial, commercial, and institutional boilers (40 CFR 60, Subpart DDDDD), the Facility's boilers will be regulated as "existing" units. Subpart DDDDD applies to new, reconstructed, and existing units. There is no separate category in Subpart DDDDD for a modification. See Section 63.7490(a).

Reconstruction is not defined in Subpart DDDDD. However, reconstruction is defined in 40 CFR 63.2 as follows:

Reconstruction, unless otherwise defined in a relevant standard, means the replacement of components of an affected or a previously nonaffected source to such an extent that:

- (1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and
- (2) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act. Upon reconstruction, an affected source, or a stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

Stationary source also is defined in 40 CFR 63.2:

Stationary source means any building, structure, facility, or installation which emits or may emit any air pollutant.

Since the source is defined as the building, structure, facility or installation that emits any air pollutant, it is clear that the industrial boilers at NHPP's Facility are the affected sources under Subpart DDDDD.

There will not be a reconstruction of the Subpart DDDDD sources at the Facility because NHPP is not proposing to replace any of the components of the Facility's boilers. The addition of a steam turbine-generator and associated heat dissipation system at the Facility is not reconstruction under 40 CFR 63.2 because this equipment is not part of the affected source.

Since the Facility's boilers are not new or reconstructed, as defined in Subpart DDDDD, the Facility's boilers are subject to the regulations for existing boilers. See Sections 63.7490(b), (c), and (d). NHPP must comply with the Subpart DDDDD requirements by September 13, 2007. See Section 63.7495(b). Among other things, the Facility must comply with the emission limits in Subpart DDDDD for particulate matter, hydrogen chloride and mercury. NHPP anticipates that it will be able to demonstrate compliance with these emissions limits without installing any new air pollution control equipment. In any event, NHPP will address all of the applicable Subpart DDDDD requirements in future submittals to the Department.

FDEP AIR RAI #4, Annual Capacity Factor:

- **Please estimate the maximum expected actual annual capacity factor (in terms of heat input rate) for the cogeneration plant. What factors typically influence the operating rates of the cogeneration units? Will the units operate a reduced capacity at night during the cane-milling season as well as during the off-season? Does the available biomass fuel supply limit operation of the facility at capacity? Describe expected operation during the cane-milling season and during the off-season.**
- **How many hours are planned for regularly scheduled down times to perform maintenance and inspections? Historically, how many additional hours of down time were needed to perform unscheduled maintenance and repairs?**

Additional Information: The NHPP Facility produces steam to generate electricity and to supply process steam to the Okeelanta sugar mill and refinery. The process steam demand is seasonal; it is higher in the fall and winter than in the spring and summer. Accordingly, during the spring and summer when the process steam demand is lower, the Facility has the capacity to generate additional non-process steam. The basic purpose of the current project is to add a steam turbine generator, plus related auxiliaries, to more effectively utilize the steam generating capacity of the Facility on a year-round basis. NHPP estimates that the net electrical output of the Facility will be increased approximately an additional 165,000 MWH/year, with most of this electrical energy produced during the spring and summer months when the additional steam capacity is available.

NHPP estimates that the maximum annual capacity factor for the Facility will range from 14.5×10^6 to 19×10^6 MMBtu per year after the second turbine generator is installed (73- to 95-capacity factor). This range is dependent upon several operational variables, including but not limited to process steam demand, plant availability, public demand for electricity, and electrical wholesale market conditions.

The major factors that typically influence the operating rates of the cogeneration units are the process steam demand of the sugar mill during the grinding season, which is usually October through March, and the general wholesale market conditions associated with the production and sale of electricity during the non-grinding season.

After the second turbine generator is installed, the cogeneration units are expected to operate year-round at full capacity, except during planned outages and unscheduled maintenance.

NHPP is confident that the available fuel supply is sufficient to accommodate the Facility's operational requirements.

Annually each cogeneration boiler is scheduled for three weeks (504 hours) of downtime to conduct maintenance and inspections. Historically, unscheduled maintenance has accounted for approximately 250 hours of total downtime per boiler.

FDEP AIR RAI #5 Additional Fuel: From where will the additional biomass fuels come? Identify any sugar mills that are potential sources of bagasse. Is New Hope Power working on any preliminary contracts to obtain bagasse from any of the sugar mills? Will new contractors be needed to secure additional amounts of wood chips? Identify any new sources for the wood chips. Describe the fuel management program that will be used to ensure that only bagasse and clean, dry wood is fired in the cogeneration boilers. Will changes be made to the existing fuel management plan to ensure that foreign materials are not introduced? Identify all reasonable precautions that will be taken to prevent fugitive emissions from the storage and handling of the additional volumes of biomass.

Additional Information: During 2003, NHPP used approximately 900,000 tons of bagasse and 700,000 tons of clean wood fuel to generate all the steam required to support the process steam requirements of the Okeelanta Corporation's sugar mill and refinery and to generate electricity for sale to the power grid. The addition of the second turbine generator and auxiliary equipment is expected to result in the consumption of an additional 250,000 tons per year of clean biomass fuels. This represents an increase in fuel use of approximately 16%. The additional biomass fuel needed for future operations will be provided by the same vendors that currently provide the Facility's fuel.

In the past, NHPP has received excess bagasse fuel from U.S. Sugar Corporation. There are no plans to secure any additional bagasse contracts at this time.

NHPP's existing "Wood, Bagasse and Ash Inspection and Testing Plan" (Plan) was designed to ensure that only clean biomass fuels are fired at NHPP's Facility. The Plan was revised on 9/14/04 for incorporation into the Facility's Title V permit. In addition, NHPP's fuel specifications are included as part of NHPP's contracts with its fuel suppliers. NHPP will continue to utilize its Plan and contractual requirements as management tools to ensure a clean fuel source for the facility. This approach has worked well in the past, as confirmed by the Department's site inspections and NHPP's fuel analyses.

As stated above, NHPP's proposed project will result in a 16% increase in the Facility's fuel consumption. NHPP will continue to employ best management practices to control fugitive emissions. For example, NHPP uses enclosed conveyors and conveyor transfer points, except in the stacker/reclaimer transfer areas, where enclosures are infeasible. NHPP also uses water sprays during dry periods and when otherwise necessary to control fugitive emissions.

CONCLUSION

NHPP wishes to resolve all of the Department's questions as expeditiously as possible so that NHPP can move forward in a timely manner under the Florida Electrical Power Plant Siting Act. Please call me or David Buff at (352) 336-5600 if you need any additional information.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E.
Principal



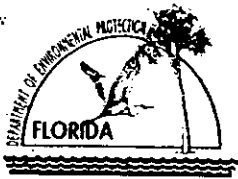
Principal

DAB/dmw

Enclosures

cc: James Meriwether, NHPP
Gus Cepero, NHPP
David Dee, Esq., Landers and Parsons
Hamilton S. Oven, Jr., P.E., FDEP Siting Office

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Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: New Hope Power Partnership	
2. Site Name: Okeelanta Cogeneration Plant	
3. Facility Identification Number: 0990332	
4. Facility Location...: Street Address or Other Locator: 8001 U.S. Highway 27 South City: South Bay County: Palm Beach Zip Code: 33493	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: James Meriwether, Environmental and Safety Manager	
2. Application Contact Mailing Address... Organization/Firm: New Hope Power Partnership Street Address: 8001 U.S. Highway 27 South City: South Bay State: FL Zip Code: 33493	
3. Application Contact Telephone Numbers... Telephone: (561) 993-1003 ext. Fax: (561) 996-6596	
4. Application Contact Email Address:	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	