



December 18, 2014

140-5071
Via Electronic Delivery

Mr. David Read
Florida Department of Environmental Protection
Bob Martinez Center
200 Blair Stone Road
Tallahassee, Florida 32339-2400

**RE: REQUEST FOR EXTENSION OF PSD PERMIT EXPIRATION DATE
PERMIT NO. 0990332-021-AC (PSD-FL-425)
NEW NATURAL GAS FIRED BOILER (BOILER D)**

Dear Mr. Read:

New Hope Power Company (NHPC) was issued a prevention of significant deterioration (PSD) permit from the Florida Department of Environmental Protection (FDEP) on August 27, 2013 (Permit No. 0990332-021-AC/PSD-FL-425) for the installation of a new natural gas-fired boiler (Boiler D) at the existing Okeelanta cogeneration site. Boiler D will have a design heat input rate of 536 million British thermal units per hour (MMBtu/hr) and a corresponding design steam production rate of 400,000 pounds per hour (lb/hr) on a 24-hour basis. The addition of a natural gas-fired boiler will allow NHPC the flexibility to produce steam and electricity year-round based on the most economical fuel or fuel mix. Steam produced by the new boiler will be tied into the existing steam system, which serves two steam turbine electrical generators and provides the Okeelanta sugar mill and refinery with steam.

Pursuant to Rule 62-4.080(3), Florida Administrative Code (F.A.C.), NHPC requests the extension of Permit No. 0990332-021-AC/PSD-FL-425, due to expire on December 31, 2016. The rule specifies that the request must be submitted to the Department in writing before the expiration date. However, in this case, the request is being made not only in advance of the permit expiration date, but before the lapse of 18 months from the permit issuance date, which is February 26, 2015. Administrative Requirement number 7(a) of Permit No. 0990332-021-AC/PSD-FL-425 states that "Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit". NHPC received this FDEP construction permit on August 27, 2013.

It is our understanding that an extension would restart the 18 month commencement of construction timeline. As discussed during our phone call of October 21, 2014, this permit extension request is necessary because NHPC has been delayed in commencing construction due in part to EPA's permit processing schedule for the required greenhouse gas (GHG) PSD permit, which was issued almost seven (7) months after the FDEP permit was issued. NHPC requests that the FDEP PSD permit be revised to state that construction must commence within 18 months of issuance of the final GHG PSD permit (PSD-EPA-R4016) issued by EPA on March 17, 2014. In addition, NHPC is requesting that the expiration date for the FDEP PSD permit be extended by seven months, from December 31, 2016 to July 31, 2017, to account for the seven month delay in the EPA permit issuance.

The Boiler D project was subject to PSD review for nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM) with an aerodynamic particle size of 10 microns or less (PM₁₀), PM with an aerodynamic particle size of 2.5 microns or less (PM_{2.5}) and greenhouse gases (GHGs). Based on the delegation of PSD authority at the time of the FDEP permit issuance, the PSD permit for non-GHGs (i.e., NO_x, CO, PM₁₀ and PM_{2.5}), was issued by FDEP, while the GHG PSD permit was issued by EPA Region IV. Since that time, FDEP has been delegated PSD review for GHGs by EPA.

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It is our understanding that, because the PSD permits for Boiler D were only recently issued (i.e., within the last 14 months), NHPC will not need to re-visit the earlier BACT determinations for those pollutants that were subject to PSD review. However, it should be noted that a review of the BACT/RACT/LAER Clearinghouse, as well as our project-specific conditions, indicate that the BACT determinations would remain unchanged.

Attached is the supporting application form with signed pages from the Authorized Representative and from the licensed PE of record.

Thank you for your consideration of this request. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



Philip D. Cobb, Ph.D., P.E.
Senior Project Engineer



David A. Buff, P.E., Q.E.P.
Principal Engineer

cc: M. Leis, NHPC
D. Dee, GBW Legal
J. Gonzalez, NHPC
W. Tarr, NHPC
M. Capone, NHPC

PC



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 any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

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

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: New Hope Power Company	
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: Matthew Capone, Director of Environmental Compliance	
2. Application Contact Mailing Address... Organization/Firm: New Hope Power Company Street Address: P. O. Box 9 City: South Bay State: FL Zip Code: 33493	
3. Application Contact Telephone Numbers... Telephone: (561) 993-1658 ext. Fax: (561) 992-7326	
4. Application Contact E-mail Address: Matthew_Capone@floridacrystals.com	

Application Processing Information (DEP Use)

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

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

NHPC was issued Permit No. 0990032-021-AC/PSD-FL-425 to install a new natural gas-fired boiler (Boiler D). This construction permit has an expiration date of December 31, 2016. EPA issued a greenhouse gas (GHG) permit for Boiler D (Permit No. PSD-EPA-R4016) approximately seven months after FDEP issued its construction permit. Therefore, NHPC is requesting that the expiration date for Permit No. 0990032-021-AC/PSD-FL-425 be extended by seven months to July 31, 2017 to match the EPA GHG permit.

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
006	Cogeneration Boiler D	N/A	N/A

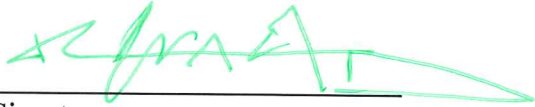

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

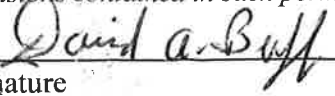
1. Owner/Authorized Representative Name : Jose Gonzalez, Vice President of Industrial Operations
2. Owner/Authorized Representative Mailing Address... Organization/Firm: New Hope Power Company Street Address: P. O. Box 9 City: South Bay State: FL Zip Code: 33493
3. Owner/Authorized Representative Telephone Numbers... Telephone: (561) 993-1600 ext. Fax: (561) 992-7326
4. Owner/Authorized Representative E-mail Address: Jose.Gonzalez@floridacrystals.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature  _____ Date

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: () ext. Fax: ()
5. Application Responsible Official E-mail Address:
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application. _____ Signature _____ Date

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6026 NW 1st Place City: Gainesville State: FL Zip Code: 32607
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 21145 Fax: (352) 336-6603
4. Professional Engineer E-mail Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>12/18/14</u> (seal)

* Attach any exception to certification statement.

**Board of Professional Engineers Certificate of Authorization #00001670.