Florida Department of

Memorandum — Environmental Protection

TO: Power Plant Siting Review Committee

FROM: Buck Oven BO

DATE: April 17, 1995

SUBJECT: Cedar Bay Cogeneration Project, PA 88-24
Module 8031

Please review the material submitted in response to questions raised by the Department and other parties concerning a modification request by Cedar Bay Cogeneration Project. Please return your comments on the repsonse by May 18, 1995.

If you have any questions, I can be reached at 487-0472/ SC 277-0472.

cc: Clair Fancy
Chris Kirts
Al Linero
Al Rushanan
Steve Pace
Chip Collette

Cedar Bay Generating Company, Limited Partnership

April 11, 1995

Mr. Hamilton Oven
Administrator
Office of Siting Coordination
Department of Environmental Protection
3300 Commonwealth Boulevard
Tallahassee, Florida 32399

RE: Response to Comments on CBGC Modification Request

Dear Mr. Oven:

Enclosed for your review is a comment response document for comments received regarding the request for modification to the site certification (PA 88-24) issued by Florida Department of Environmental Protection. These comments were received via your January 10, 1995 letter to Mr. Barret Parker of U.S. Generating Company. We issued a letter to all interested parties establishing that we would respond to comments on April 7, 1995. We apologize for the brief delay.

We have provided complete responses to all comments except for the Florida Department of Transportation (FDOT) comment regarding potential impacts from estimated increased train traffic resulting from the proposed modification. We are continuing to pursue resolution of this issue by working directly with the FDOT.

As indicated copies of this letter and the response document have been distributed to all commenting agencies. Please call with any questions or comments.

Sincerely,

Mark V. Carney
Director, Environmental Affairs

MVC/tmk

7500 Old Georgetown Road • Bethesda, Maryland 20814-6161 • 301-718-6800 • Fax 301-718-6900
An affiliate of U.S. Generating Company

cc: R. Pace (RESD)
C. Kirts (FDEP, NED)
N. Barnard (SJRWMD)
F. Stallwood
K. Grant
J. Hopkins
D. Beckham
D. Roberts

Response Document
For Comments Regarding
The October 31, 1994 Request for Modification
To Site Certification (PA 88-24)
Cedar Bay Cogeneration Facility
Cedar Bay, Florida

The Cedar Bay Generating Company, Limited Partnership (CBGC) has submitted a request to modify certain conditions of the site certificate (PA 88-24) to the Florida Department of Environmental Protection (FDEP) in October 1994. The Office of Siting Coordination (OSC) of the FDEP has received comments regarding the site certification modification from;

- the City of Jacksonville's Regulatory and Environmental Services Department (RESD), (letter to OSC dated December 1, 1994),
- the St. Johns River Water Management District (letter to OSC dated January 4, 1995),
- other FDEP offices (internal memoranda dated November 22, 28, and 29 and December 1 1995), and
- the Florida Department of Transportation (letter to OSC dated January 13, 1995).

These comments were forwarded to CBGC on January 10, 1995 by OSC for CBGC response. CBGC is pleased to provide the following responses to these comments. Additionally, CBGC is responding to comments received through discussion with other interested parties. The comments and associated responses are organized per commenting agency with each response being preceded by a short summary of the comment. Copies of all original comments are provided in Attachment A.

City of Jacksonville, RESD

Comment 1. The Air Quality Division (AQD) has no objection to deleting the Pelletizing Recycle Hopper as a permitted source, but AQD expressed concern that this source could become a source of fugitive particulate violations.

Response 1. CBGC's request involves removing the Pelletizing Recycle Hopper from the list of sources contained in Condition II.B.4.a, not deleting the Pelletizing Recycle Hopper as a permitted source. CBGC believes that the removal from the list is warranted because all other sources on the list meet the definition of source: have at least one point at which an air pollutant first enters the atmosphere, (per 62-210, F.A.C.). The Pelletizing Recycle Hopper will continue to be operated with a baghouse, thereby reducing the potential for fugitive particulate emissions. However, in order to alleviate concern over the potential for the Pelletizing Recycle Hopper to become a source of fugitive particulate emissions, CBGC proposes to perform a one-time verification test on the exhaust from the Pelletizing Recycle Hopper control device to verify that

the emission limitation, (0.003 gr/dscf) for the sources listed in Condition II.B.4.a is being maintained. This will require the installation of a temporary exhaust duct for the Pelletizing Recycle Hopper control device within the enclosure building. Upon verification of the emission limitation, the temporary exhaust duct will be removed.

Comment 2. AQD does not oppose adding the Pelletizing Curing Silo Outlet Conveyor, Pelletizing Fly Ash Receiver, and Pelletizing Bed Ash Receiver to the list of material handling sources. AQD notes that emissions tests (both stack tests and visible emissions tests) for each of these facilities resulted in emissions below the limitation of 0.003 gr/dscf and visible emissions less than five percent opacity. AQD presumes that annual visible emissions tests would be the only additional requirement for these sources.

Response 2. CBGC's request involves revising the list contained in Condition II.B.4.a. to include three sources whose emissions were identified and evaluated during the original certification and subsequent modification proceeding. These sources would be subject to the requirements given in Condition II.B.4.a.: more specifically, to a particulate emission limitation requirement of 0.003 gr/dscf and to a one-time emissions test using Method 5. CBGC believes that subsequent visible emissions for these sources would be required only upon request by RESD or DEP, rather than annually.

Comment 3. AQD does not oppose removing the requirement for conducting particulate matter emissions testing for the Coal Car Unloading source and suggests that this source was constructed at variance to its design. AQD notes that the installed wet suppression control system appears to work well, suggests that this system be kept in operation, and proposes that a new Condition II.B.4.c. be added that would include the wet suppression control but delete the particulate matter test requirement.

Response 3. CBGC's coal unloading system was constructed as specified in the design submitted and approved by the Florida Department of Environmental Protection (FDEP) Siting Coordination Office in the original site certification approval and subsequent modification proceeding. This design has always relied on enclosed transfer points with water sprays, a wet suppression technique, to control emissions. No baghouses or scrubbers were ever envisioned for the Coal Car Unloading sources. The three other sources contained in the list in Condition II.B.4.b use wet scrubbers, a wet removal technique, to control emissions. Because the scrubbers have stacks, they can be tested for particulate matter emissions, but because the enclosed transfer points do not have stacks, they cannot be tested for particulate matter emissions.

CBGC did not intend to exempt or circumvent the requirements to use wet spray suppression controls or to meet a 5% opacity limit. CBGC agrees with RESD's counterproposal, and requests that a new condition, Condition II.B.4.c, with the following language be added to the site certificate:

" c. The PM emissions from coal car unloading shall be controlled using wet suppression methods. Coal car unloading sources are subject to a visible emission (VE) limitation

requirement of 5 percent opacity. Initial and subsequent compliance tests shall be conducted for VE using EPA Method 9 in accordance with Rule 17-297, F.A.C., and 40 CFR 60, Appendix A (July, 1991 version)."

Comment 4. AQD notes that summing the allowables of the Dryer/Pulverizers is in accordance with F.A.C. 62-296.700(4)(b)2, but identifies a math error and suggests that actual, not design, dry flow rates be used to determine the overall limit.

Response 4. CBGC requests that the particulate matter emission limitation for the limestone pulverizer/dryer be corrected to 1.50 pounds per hour, and CBGC requests that the emission rate continues to be derived from the design flow rates. CBGC contends that design flow rates are appropriately used in establishing the emissions limitation. The testing was performed appropriately with the material throughput rates maintained at 90% or greater of design maximum throughput rates during the emission test. Some of the operating parameters of the limestone pulverizer/dryer (e.g., limestone moisture content, specific fuel heating value, humidity and temperature of excess air, etc...) are quite variable. With this variability, the use of actual flow data (from a single emissions test) to establish an hourly emission limit results in a potentially restrictive condition. The design flow rates reflect reasonable maximum flows and, therefore, the hourly emission limit of 1.50 lb/hr is appropriate. In addition, CBGC believes that hourly emission limitd derived from the maximum design dry flow rate at a standard reference temperature prevents potential controversy that could arise due to volume changes associated with temperature differences.

Comment 5. AQD offers no objection to load out and shipment of ash in non-pelletized form, but AQD requests wet suppression control, a 5 percent opacity requirement, and annual VE testing on bulk ash load out. AQD questions how trucks are sealed during loading and transport.

Response 5. CBGC accepts AQD's comments, and requests that a new condition, Condition II.4.d.. with the following language be added to the Site Certificate:

" d. The PM emissions from non-pelletized ash removal shall be controlled using one or more wet suppression methods. Non-pelletized ash removal sources are subject to a visible emission (VE) limitation requirement of 5 percent opacity. Initial and subsequent compliance tests shall be conducted for VE using EPA Method 9 in accordance with Rule 17-297, F.A.C., and 40 CFR 60, Appendix A (July, 1991 version)."

Since CBGC's subsequent review has shown that non-pelletized ash removal via trucks is not feasible and will not be implemented, CBGC believes that AQD's question concerning truck sealing during loading and transport is moot.

Comment 6. AQD requests clarification regarding material handling and treatment area sources and their control devices.

Response 6. CBGC provided such clarification in a memorandum dated June 15, 1994 from Kevin Grant to Wayne Tutt of RESD. A listing of sources, identification numbers, equipment tag numbers and control device description is provided in Attachment B.

Comment 7. AQD suggests that CBGC modify its PSD permit.

Response 7. CBGC will seek modification to its PSD permit as soon as possible.

Comment 8. AQD states that impacts on air quality can not be assessed until Florida Department of Transportation (FDOT) has completed its review of the proposed modification.

Response 8. CBGC is not aware of an air quality issue raised by FDOT or by the FDOT review comments. Also, please see comment and response No.13, below.

Comment 9. The Water Quality Division (WQD) commented that the reverse osmosis (RO) pretreatment (proposed to alleviate the total dissolved solids (TDS) operational problem with the demineralizer system) should result in increased demineralizer water output by 150 gallons per minute (gpm). The WQD asks why there would be a need for an additional 17.7% facilities' service water.

Response 9. CBGC acknowledges WQD's concerns, however the flow analysis performed by WQD may not account for differences in minimum SK condensate return flow and maximum demand flow for demineralized water. The additional facility service water represents a worse case scenario where the return flow of condensate(from SK) is minimized and plant demand for demineralized water is maximized. It is important to note that this maximum service water flow (obtained from well water) is still within the groundwater limits established in the site certification.

Comment 10. WQD comments that the flow rates of Seminole Kraft (SK) condensate return through the proposed heat exchanger are not consistent; that is, the existing SK flow rate of 400 gpm is 240 gpm greater than the proposed flow through the heat exchanger.

Response 10. CBGC acknowledges WQD's concerns regarding the flow of SK condensate. Again, the WQD question may arise from not accounting for minimum and maximum flows of two independent systems. The maximum design flow of SK condensate is 600 gpm. The average design flow of the condensate return is 400 gpm. The minimum flow of SK condensate is 180 gpm. When the SK condensate return is at a minimum, the balance of the required demineralizer make-up water must come from the service water system. As the volume of SK condensate return increases over its minimum (normally at 400 gpm), there is a corresponding reduction in the facility service water. As discussed above (comment & response No. 9), the maximum flow of well water is within permitted limits.

Comment 11. WQD requests further information on the waste hauler for the zero discharge system.

Response 11. Two different primary waste haulers are employed by CBGC to haul the zero discharge system waste for disposal. These two waste haulers occaisionally use additional (i.e., subcontracted) waste haulers. The information for the prime waste haulers is listed below. The information for the subcontrator waste haulers is provided in Attachment D.

Industrial Water Services
P.O. Box 43369
Jacksonville, FL 32203
904 -354 - 0372
CONTACT: Richard Grant
Russ Carter

EPA ID Number: FLD981928484

Waste Management of Jacksonville
P.O. Box 6987
Jacksonville, FL 32236
904 - 388 - 8561
CONTACT: Mike Whygard

EPA ID Number: FLD053109203

St. Johns River Water Management District

Comment 12. The St. John River Water Management District requested that a demonstration be provided that the proposed modifications will not adversely impact the design (both runoff quantity and quality) of the stormwater management system.

Response 12. CBGC acknowledges that the proposed modifications include addition to the demineralized water building and increased use of the bulk ash load out system. The addition to the demineralized water building will result in increased stormwater flow to the lined runoff containment basin from the roof of the building. This addition will have no impact to the stormwater system (please refer to Attachment C). The increased use of the bulk ash load out system will not change the currently approved stormwater management system either in quantity or quality of runoff from the bulk ash load out area. Existing operating procedures, including the upgraded design for permanent rail car cover system used during loading, are adequate for proper stormwater management.

Florida Department of Transportation

Comment 13. The Florida Department of Transportation (FDOT) raised comments regarding train and truck traffic increases resulting from the proposed modifications.

Response 13. Regarding the truck shipment of dry ash, since the submittal for the request for modification to the site certification, CBGC has identified that truck shipment of dry ash is not feasible, and, therefore, CBGC withdraws truck shipment of ash from the request for modification. CBGC is currently pursuing resolution to the FDOT comment on increased train traffic. As this issue comes to resolution an addendum to this response document will be sent to all commenting agencies.

Florida Department of Environmental Protection

Comment 14. The Florida Department of Environmental Protection (DEP) suggests that a PSD permit modification be requested.

Response 14. Please see comment and response No. 7, above.

Comment 15. The DEP raised issue with the modification to the site certification to clarify the terms and conditions for the limestone/pulverizer emission unit.

Response 15. Please see comment and response No. 4, above.

Comment 16. The DEP raised issue with the deletion of coal car unloading as a source. The DEP feels that coal car unloading is still a source of fugitive emissions under the proposed modifications to the site certification. The DEP suggested including provisions for wet suppression spray and VE standards for the site certification.

Response 16. Please see comment and response No. 3, above.

Comment 17. The DEP requested additional data regarding emissions control during dry ash load out to trucks.

Response 17. Please see comment and response No. 5, above.

Comment 18. The DEP comments that they have no objection to the bulk dry ash load out as proposed, and that this tacit agreement with the proposed modification does not constitute final authority of use of ash as an additive to either concrete or soil.

Response 18. CBGC acknowledges the DEP's statement on the final use of ash. Also, please see comment and response No. 5, above. CBGC notes that, although there are no immediate

plans for using ash as a concrete additive, use of bottom ash and/or fly ash as concrete additive is expressly permitted in Section IX of the existing site certification.

Comment 19. The DEP commented that the rule references in Sections I, III, III.A.7.e, IV.B, IV.G, IV.H.1, and IV.H.2 require updating.

Response 19. CBGC acknowledges the required updates.

Comment 20. The DEP commented that it had no objections to the proposed modifications identifying that there were no proposed changes to the Conditions of Certification involving wastewater. They acknowledged that they were aware of the comments on stormwater management raised by St. Johns River Water Management District and commented that the volume of Seminole Kraft (SK) wastewater recycled by the zero discharge system and the volume of treated wastewater reused by SK as make-up water will remain approximately the same.

Response 20. CBGC acknowledges the comments. Also, please refer to comment and response No. 10, above.

Comment 21. The DEP had no objections to the proposed modifications as they relate to Industrial Wastewater, surface water, and the Conditions of Certification.

Response 21. CBGC acknowledges the comment.

Other Interested Parties' Miscellaneous Comments

Comment 22. Comment was raised regarding testing coal car unloading.

Response 22. Please see comment and response No. 3, above.

Comment 23. Comment was raised requesting retaining specific requirements for wet spray dust suppression for coal car unloading.

Response 23. Please see comment and response No. 3, above.

Comment 24. Comment was raised regarding the total amount of sludge generated by the Zero Discharge System for disposal.

Response 24. The maximum amount of sludge generated by the Zero Discharge System for disposal is estimated to be 70 tons/day. The previous estimate was 54 tons/day.

ATTACHMENT A-1

Comments 1-11

REGULATORY & ENVIRONMENTAL
SERVICES DEPARTMENT
Air Quality Division

December 1, 1994

Mr. Hamilton S. Oven, P.E., Administrator
Office of Siting Coordination
Department of Environmental Protection
3300 Commonwealth Boulevard, Room 953
Tallahassee, Florida 32399

RE: Cedar Bay Cogeneration
Request for Modification
PA 88-24

Dear Mr. Oven:

The Air Quality Division (AQD) and the Water Quality Division (WQD) have reviewed the subject modification. Attached are our comments and questions.

We appreciate the opportunity to participate in this review.

If there are any questions, please contact me.

Very truly yours,

Robert S. Pace, P.E.
Division Chief

RSP/sa

Attachment

c: Mrs. Barbara Broward
Mr. Chris Kirts, P.E., FDEP/N.E. District
Mr. Kevin Grant, CBGC
Mr. Barrett Parker, U.S. Generating Co.
AQD File 1065A

421 West Church Street - Suite 412
Jacksonville, Florida 32202-4111

Area Code 904/630-3484

AQD/WQD
REVIEW OF CEDAR BAY
PROPOSED MODIFICATION - PA 88-24

Air Quality

1. Deleting the Pelletizing Recycle Hopper as a permitted source:

   This source vents inside a sheet metal building with vinyl curtains covering the windows. AQD has no objection to deleting it as a permitted source. However, the potential exists that this may become a source of fugitive particulate violations.

2. Adding the Pelletizing Curing Silo Outlet Conveyor, Pelletizing Fly Ash Receiver, and the Pelletizing Bed Ash Receiver as permitted sources:

   These three sources were tested for PM and VE emissions on March 9, 1994 and all three were less than 0.003 gr/DSCF and 5% opacity. Presumably, annual VE tests would be the only requirement for these three sources if added as new permitted sources.

3. Deleting the PM testing requirement for Coal Car Unloading:

   This source cannot currently be tested for PM emissions due to a lack of a collection system and no ductwork suitable for PM testing. AQD does not like the manner in which this modification has come about. It sets a bad precedent to issue a license requiring specific testing, allow a facility to construct the source in such a way that it cannot be tested, and to then delete the testing requirement. Nevertheless, the wet suppression system installed appears to work well with little visible emissions from the coal unloading structure. There appears to be no technical basis for requiring PM testing on this source.

   As drafted by CBGC in its proposal, coal car unloading is deleted entirely from the list of material handling sources in Section II B. 4. b. Such a proposal would not only delete the PM test requirement, but would apparently delete the wet suppression control requirement, the 5% opacity limit and the Method 9 VE test requirement. This may not be CBGC's intent. To correct this problem, a new paragraph II B. 4. c. should be added to address the coal car unloading, requiring wet suppression control, a 5% opacity limit and annual VE testing using EPA Method 9. It should be noted that this source has already passed an initial Method 9 test.

4. Deleting the Limestone Dryers as permitted PM sources and consolidating the Dryers and Pulverizers emission limits into one lbs/hour-based PM emission limit:

   CBGC's proposal to sum the allowables of the Dryers/Pulverizers, as per FAC 62-296.700(4)(b)2, to produce an allowable of 1.40 lbs/hour appears to be technically correct (Math error? 1.26 + 0.24 = 1.50). However, CBGC is using the design flow rate of 49,000 DSCFM in its calculations. Actual data from the January 26 and March 11, 1994 PM tests reveal flow rates of 40,273 and 40,572 DSCFM for Dryers #1 and #2, and emission rates of 0.0031 and 0.0022 gr/DSCF, respectively. Using these values, the "new" calculated emission rates would be 1.28 lbs/hour for both Dryers/Pulverizers.

   (0.003) (40,273; 40,572) (60) / 7,000 = 1.04, + 0.24 = 1.28 #/hour.

   It is noted that both sources have demonstrated compliance with the 1.28 #/hour limit and would presumably be subject to annual VE tests only, unless the opacity should increase to greater than 5%.

5. Solid Waste Storage and Disposal:

   AQD offers no objection to modifications to allow the load out and shipment of ash in a non-consolidated form. However, the certification should clearly require wet suppression control, a 5% opacity requirement and annual VE testing on bulk ash load out.

   AQD would question how the trucks are sealed during loading and transport.

6. AQD requests clarification of paragraph 4.1.1, page 4-1, as the designations given the sources do not correspond to the designations given to the control devices for these sources.

7. Cedar Bay should request modification to their PSD permit also.

8. The impacts on roadway level of service created by more trains causing congestion at railroad crossings has not been verified at this time by the Florida Department of Transportation (FDOT). Information was requested by FDOT, but FDOT has not received the data from Cedar Bay at this time. Impacts on air quality can not be made until FDOT completes their review.

Water Quality

1. Demineralizer System:

   The two operational problems cited in the proposal are:

   a. Total Dissolved Solids (TDS) in the facility's service water is higher than expected which resulted in lower demineralized water output. (figure 3.2, page 3-4).

   b. Seminole Kraft (SK) condensate return has higher temperature and TDS than expected.

   The proposed installation of a pretreatment reverse osmonis (RO) should (1) reduce the regeneration waste significantly and (2) increase the demineralized water output by at least 150 gpm (based on figure 3.3). Why would there be a need for additional facilities' service water (17.7% increase)?

   Existing SK condensate return flow rate is 400 gpm. The proposed heat exchanger is for 160 gpm of SK condensate return. What is the actual condensate return temperature versus expected value? Why is there such a significant reduction in flow? What happens to the other 240 gpm of SK condensate return?

2. Zero Discharge System:

   The applicant needs to provide further information on the waste hauler, which should include:

   a. Certification and/or permit numbers.

   b. Address and telephone number.

   c. Point of contact person.

   d. Update RESD and DEP of all changes as soon as possible.

ATTACHMENT A-2

Comment 12

ST JOHNS RIVER

WATER MANAGEMENT DISTRICT

Henry Dean, Executive Director
John R. Wehle, Assistant Executive Director
Charles T. Myers III, Deputy Assistant Executive Director

POST OFFICE BOX 1429 PALATKA, FLORIDA 32178-1429
TELEPHONE 904/329-4500 SUNCOM 904/860-4500
TDD 904/329-4450 TDD SUNCOM 860-4450
FAX (EXECUTIVE/LEGAL) 329-4125 (PERMITTING) 329-4315 (ADMINISTRATION/FINANCE) 329-4508

FIELD STATION

618 E. South Street
Orlando, Florida 32801
407/897-4300
TDD 407/897-5960

7775 Baymeadows Way
Suite 102
Jacksonville, Florida 32256
904/730-6270
TDD 904/730-7900

PERMITTING:
305 East Drive
Melbourne Florida 32904
407/984-4940
TDD 407/723-5068

OPERATIONS:
2133 N. Wickham Road
Melbourne Florida 32935-8109
407/254-1762
TDD 407/253-1703

January 4, 1995

Hamilton S. Oven
Administrator, Office of Siting Coordination
Department of Environmental Protection
3300 Commonwealth Blvd., Room 953
Tallahassee, Fl 32399

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

JAN 0 9 1995

SITING COORDINATION

Re: Cedar Bay Cogeneration Project PA 88-24; Request for Modification

Dear Mr. Oven:

The St. Johns River Water Management District has reviewed the application for Modification to the Cedar Bay Cogeneration Project Certification received November 2, 1994. The modification requests an increase in groundwater use of 100 gpm. See section 3.1.5. Upon review of data for January through June, the actual use is approximately 0.81 mgd. The additional 100 gpm or 0.144 mgd will not cause the use to exceed the 1.45 mgd allocation.

The District also reviewed the application for modification for stormwater impacts. We found that this issue was not specifically addressed so we cannot provide an opinion at this time. The District has the following request for additional information:

> Please demonstrate that the proposed modifications will not adversely impact the design (both runoff quantity and quality) of the stormwater management system.

I have contacted Barrett Parker about this matter and understood that another submittal would be forthcoming. If you have any questions, please do not hesitate to contact me at (904) 329-4153 or Suncom 860-4153.

Sincerely,

Nancy B. Barnard

Nancy B. Barnard
Assistant General Counsel

cc: David Miracle
Caroline Silvers
Richard Donelan - DEP
Ed Cordova - DEP
Doug Roberts
Jim Heard
Barrett Parker

ATTACHMENT A-3

Comment 13

FLORIDA DEPARTMENT OF TRANSPORTATION
LAWTON CHILES
GOVERNOR
605 Suwannee Street, Tallahassee, Florida 32399-0450
BEN G. WATTS
SECRETARY

January 13, 1995

Hamilton S. Oven, Administrator
Office of Siting Coordination
Florida Department of Environmental Protection
Douglas Building, Room 953
3900 Commonwealth Boulevard M.S. 48
Tallahassee, Florida 32399-3000

Re: Cedar Bay Cogeneration Plant Modification, No. PA 88-24.

Dear Mr. Oven:

Included herewith you will find the Department of Transportation's Agency Report on the Cedar Bay Cogeneration Plant Modification. This outline of the Department's position was prepared by Sandra Whitmire of the Department's Office of the State Transportation Planner, with input from the Department's District II Office of Planning and Programming, which has analyzed the application. As you can see, the proposed modification will have a traffic impact, and the Department believes the applicant should pay its share of mitigation costs after negotiation with the Department and applicable local governments.

Assistant General Counsel Thomas H. Duffy has been assigned this case. Please contact Mr. Duffy with any questions or comments.

Sincerely,

Thornton J. Williams

Thornton J. Williams
General Counsel

cc: Douglas S. Roberts
Hopping Boyd Green & Sams
P.O. Box 6526
Tallahassee, FL 32314

Sandra Whitmire, State Transportation Planner, DOT
Thomas H. Duffy, Assistant General Counsel

TJW/td

RECEIVED
JAN 17 1995
Hopping, Boyd, Green & Sams

FLORIDA
LAWTON CHILES
GOVERNOR

DEPARTMENT OF TRANSPORTATION
605 Suwannee Street, Tallahassee, Florida 32399-0450

BEN G. WATTS
SECRETARY

FLORIDA DEPARTMENT OF TRANSPORTATION
AGENCY REPORT ON CEDAR BAY COGENERATION PLANT MODIFICATION
JANUARY 1995

SECTION I. ISSUES

A review of the Cedar Bay Plant modification application and the Kimley-Horn transportation study (April 1993) provided by the applicant has raised the following concerns:

1. An additional train a day is proposed as a result of the modification. This train is in addition to Cedar Bay adding a train in 1993 to the 6 trains daily prior to 1993.

2. An increase of auto traffic delay of 12.5 percent is expected as a result of the modification. This delay is in addition to already lengthy delays at rail crossings in U.S. 17. These delays result in emergency vehicles not having access to heavily populated areas during the crossings.

3. While the applicant states that the mileage traveled by its truck will decrease, the number of trips will increase by 44 trips daily. The result is to concentrate a large number of trips to a smaller area.

4. The impacts of the Cedar Bay modification are in addition to other impacts of heavy-industrial land use growth and planned development in the same area.

SECTION II. RECOMMENDATION FOR CERTIFICATION

The Department of Transportation has no objection to the modification of the certification of the Cedar Bay Plant. However, this recommendation is not free of conditions. The modification places a burden on a transportation system which is already stressed. If Cedar Bay contributes to the strain, then it is recommended that a pro-rata share of the mitigation be assigned to Cedar Bay.

SECTION III. PROPOSED CONDITIONS OF CERTIFICATION

To be negotiated by the applicant, local government officials and the Florida Department of Transportation, a pro-rata share of the mitigation equal to the impact of the applicant's actions as outlined in Section I will be assigned to Cedar Bay. This contribution may range from a share of the construction of an rail overpass on U.S. 17, to a share of placing and maintaining an emergency rescue unit at Fire Station # 37, to contributing to a study to examine alternative solutions.

ATTACHMENT A-4

Comments 14-22

FLORIDA

Department of
Environmental Protection

Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

January 10, 1995

Mr. Barrett Parker
U.S. Generating Company
7500 Old Georgetown Road
Bethesda, Maryland 20814-1616

Re: Cedar Bay Cogeneration Project, PA 88-24
Modification Request

Dear Mr. Parker:

The Department of Environmental Protection and other agencies have reviewed the October 31, 1994, request to modify the conditions of certification for the Cedar Bay Facility. Attached please find a copy of the comments received by this office concerning your request. Where appropriate, please provide a copy of your responses to the comments to this office.

Sincerely,

Hamilton S. Oven

Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Office

Attach:

cc: Richard Donelan, Esq.
Doug Roberts, Esq.
Robert S. Pace, P.E., RESD
Nancy Barnard, Esq.

TO: Buck Oven, PPS

FROM: Bruce Mitchell

DATE: December 1, 1994

SUBJ: Modification of the Cedar Bay Cogeneration Project's Conditions of Certification: PA 88-24

The following issues are raised regarding the above request:

1. A request should be submitted for a modification/amendment to the PSD permit, No. PSD-FL-137A.

2. Do the gases from the limestone dryer exit directly to the pulverizer or are the gases from each process mixed in a common manifold prior to entering the control device? If the gases from each process are not in series, then combining the allowable emissions from each emission unit is a bubble and not acceptable to the Department as a means for demonstrating compliance for a process involving multiple emission units.

3. The coal car unloading activity is considered as a potential source of air pollution. Therefore, deleting the emission activity from air permitting is not acceptable. As a practical matter, a minimum condition regarding the activity should impose the "wet suppression spray" and probably a "no visible emission" standard. Please comment.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

INTERDEPARTMENT MEMORANDUM

TO: _____
TO: _____
TO: _____
TO: _____

NORTHEAST DISTRICT - JACKSONVILLE

TO: Buck Oven

FROM: Mary Nogas, P.E.
Julia Boesch

DATE: November 28, 1994

SUBJECT: Review Memorandum
Cedar Bay Cogeneration Project, PA 88-24
Duval County - Solid Waste

1. The solid waste section has reviewed the submittal received November 2, 1994 and has no objection to ash being left in the dry form and not pelletized as proposed therein.

2. In the subject submittal it appears that a mechanism for controlling particultate emmissions during removal and loading activites has not yet been decided; there was discussion on constructing either a shroud or a cap. Therefore, as a construction certification condition to the permit, please have them provide a copy of the final design of the control mechanism once constructed for our files.

3. Please note, that this district is not authorizing the final use of ash as either an additive to concrete or to soil.

If you have any comments concerning this matter, we can be reached at SC 880-4320 or by E-Mail.

TO: Al Rushanan

THROUGH: Vincent Seibold, P.E.

FROM: Ed Cordova

DATE: November 22, 1994

SUBJECT: Cedar Bay Cogeneration Project PA 88-24
Request for Modification

The NED has reviewed the subject request for modification and has the following comments:

1. Please update the rule references in sections I, III, III.A.7.e., IV.B., IV.G., IV.H.1, and IV.H.2. Chapter 17.21.02(5)[section IV.B.] should be changed to 62-532.440. Chapters 17-301,-302,-660,-25,-522,-532 and -520 should be updated to chapter 62.

2. The modification's wastewater changes do not involve any proposed changes to the facility's COC language and would not result in any discharges from the facility's zero discharge system, therefor the NED IW section does not have any objections or comments regarding the proposed modification. The volume of Seminole Kraft wastewater recycled by the zero discharge system and the volume of treated wastewater reused by Seminole Kraft as cooling tower make-up will remain approximately the same.

Note: I understand from Buck Oven that the St. Johns River Water Management District (SJRWMD) has received a copy of the proposed modification which would increase the use of service water from aquifer wells.

Please contact me at S.C. 880-4330 ext. 311 if you require any additional information regarding this matter.

EDC/edc

: Richard Drew, Chief
Bureau of Water Facilities Planning and Regulation

ROUGH: Phil Coram, P.E., Administrator

OM: Craig Diltz, P.E., Engineer
Industrial Wastewater Section

TE: November 29, 1994

BJECT: Cedar Bay Cogeneration Project, PA 88-24

e Industrial Wastewater Section and Wastewater Facilities Section
ve reviewed the proposed operational modifications for Cedar Bay.
e modifications described for the process water and wastewater
eatment systems should not affect the current Conditions of
rtification as they relate to surface water discharges. We
erefore have no objection to the proposal.

you have any questions please contact Craig Diltz at 904/488-4522.

/cd

ATTACHMENT B

ATTACHMENT B
LIST OF SOURCES INCLUDED IN CONDITION II B.4.a AND b

Emission Point ID	Source Description	Tag Number	Control Device Description
C1	Coal Crusher Building	1BMC-DCO-1	Dust Collector/Baghouse
C2	Coal Silo Conveyor	1CHF-DCO-2	Dust Collector/Baghouse
LA1	Limestone Dryer/Pulverizer	1SGH-FLT-1A1	Dust Collector/Baghouse
LB1	Limestone Dryer/Pulverizer	1SGH-FLT-1B1	Dust Collector/Baghouse
LA2	Limestone Storage Bin	1ASF-FLT-1	Vent Filter
LB2	Limestone Storage Bin	1ASF-FLT-2	Vent Filter
A1	Bed Ash Hopper	1ASA-FLT-1	Vent Filter
A3	Bed Ash Silo	1ASA-CO-2	Bagfilter
A6	Fly Ash Silo	1ASA-FLT-2	Vent Filter
A7	Pelletizing Bed Ash Receiver	1ASF-FLT-2	Baghouse
A8	Pelletizing Fly Ash Receiver	1ASF-FLT-1	Baghouse
A9	Pelletizing Ash Recycle Tank	1ASF-DCO-2	Baghouse
A10	Ash Pellet Hydrator	1ASF-SCB-1	Venturi Scrubber
A11	Ash Pelletizing Pan	1ASF-SCB-2	Impinjet Scrubber
A12	Ash Pellet Curing Silo	1ASF-SCB-3	Scrubber
A13	Pelletizing Curing Silo Outlet Conveyor	1ASF-DCO-4	Baghouse
A14	Cured Pellet Recycle Conveyor	1ASF-DCO-3	Baghouse
A15	Pellet Recycle Conveyor	1ASF-DCO-5	Baghouse
A16	Pellet Vibratory Screen	1ASF-DCO-1	Baghouse

ATTACHMENT C

frank j holas and associates, inc.
engineering support to the construction industry

Consulting Engineers
Frank J. Holas, P.E.
President

April 6, 1995

Ronald D. Roberts
W. W. Gay Mechanical Contractor, Inc.
524 Stockton Street
Jacksonville, Florida 32204

Re: U.S. Generating Company
Demineralized Water Building Addition

Gentlemen:

The addition to the Demineralized Water building will not impact the storm water runoff in either quality or quantity. The runoffs from the roofed areas is captured in gutters and discharged by gutters to sumps. From these sumps the water is transferred to the existing water treatment facility. Thus, there is no impact or increase to the storm water from the addition of this building.

If I may be of any further assistance in this matter, please give me a call.

Sincerely,

Frank J. Holas, P. E.
President

P.O. Box 23656 • Jacksonville, FL 32241-3656 • Office (904) 268-0148 • Fax (904) 262-8160

ATTACHMENT D

The Complete Industrial Waste Water Company

BARNETT TRANSPORTATION P.O. BOX 031605 TUSCALOOSA, AL 35403	800-553-8462	EPA ALD983186412
ENVIRONMENTAL REMEDIATION SERVICE 465 TRESCA ROAD JACKSONVILLE, FL 32225	904-721-7225	EPA FLD984257089
ENVIRONMENTAL TRANSPORTATION SERVICE P.O. BOX 850020 OKLAHOMA CITY, OK 73185-0020	800-677-1772	EPA OKD981605363
GULF SOUTH TANK SERVICE 8803 ENTERPRISE COVE TAMPA, FL 33617	800-372-2857	EPA LAD034190215
INDUSTRIAL WATER SERVICES, INC. P.O. BOX 43369 JACKSONVILLE, FL 32203	904-350-1300	EPA FLD981928484
INLAND WATERS 8955 PALM RIVER ROAD TAMPA, FL 33619	813-878-1083	EPA MID982606287
JAX POLLUTION CONTROL P.O. BOX 3005 JACKSONVILLE, FL 32206	904-355-4164	EPA FLD984257089
MARINE INDUSTRIAL SERVICES P.O. BOX 43175 JACKSONVILLE, FL 32203	904-350-1062	EPA FL0000908376
MATLACK P.O. BOX 8789 1 ROLLING PLAZA WILMINGTON, DE 19899	302-426-2700	EPA DED981110166
MCKENZIE TANK LINES P.O. BOX 1200 TALLAHASSEE, FL 32302-1200	904-576-1221	EPA FLD087331369
RUST INDUSTRIAL CLEANING 345 THORPE ROAD ORLANDO, FL 32824	407-851-0040	EPA FLD063484372
UNITED DSI TRANSPORT P.O. BOX 297724 HOUSTON, TX 77297-7724	713-985-0000	EPA TXD078446820

Subcontracting Waste Haulers for Waste Managment of Jacksonville

Crawford Trucking, Inc.
12516 NW County Rd. 231
Gainsville, FL 32609

904 - 485 - 1352

No EPA ID Number. This firm does not haul hazardous waste.