



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kent L. Fickett
Cedar Bay Generating Company, L.P.
7500 Old Georgetown Road - 13th Floor
Bethesda, Maryland 20814

Dear Mr. Fickett:

RE: Request for Permit Amendment
Cedar Bay Cogeneration Project
PSD-FL-137(B); Duval County

The Department received your request of May 12, 1995, to make minor amendments to the material handling systems for ash pelletization, coal unloading, dry ash loading and removal, and limestone pulverizer/conveyor for the above referenced PSD permit. The permit's specific conditions are amended as shown:

II. B. 4. Material handling sources shall be regulated as follows:

- a. The material handling and treatment area sources with either fabric filter or baghouse controls are as follows:

Coal Crusher Building
Coal Silo Conveyor
Limestone Pulverizers (2) /Conveyors
Limestone Storage Bins (2)
Bed Ash Hopper
Bed Ash Separator
Bed Ash Silo Vent
Fly Ash Silo Vent
Fly Ash Separators (2)
Bed Ash Receiver Bin
Fly Ash Receiver Bin
Pellet Vibratory Screen System
Pelletizing-Ash Recycle Tank
Pelletizing-Recycle-Hopper
Cured Pellet Screening Recycle Conveyor System
Pellet Recycle Conveyor
Pelletizing Rail Loadout

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The emissions from the above listed sources are subject to the particulate emission limitation requirement of 0.003 gr/dscf (applicant-requested limitation which is more stringent than what is allowed by Rule 62 \pm 7-296.711, F.A.C.). Since these sources are RACT standard type then a one-time verification test on each source shall be required for PM mass emissions to demonstrate that the baghouse control systems can achieve the 0.003 gr/dscf. The performance tests shall be conducted using EPA Method 5 pursuant to Rule 62 \pm 7-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version).

- b. The PM emissions from the following process equipment, and/or facility equipment, in the material handling and treatment area sources shall be controlled using wet suppression/removal techniques as follows:

Coal-Car-Unloading	
Ash Pellet Hydrator:	<u>Scrubber</u>
Ash Pellet Curing Silos:	<u>Scrubber</u>
Ash Pelletizing Pan:	<u>Scrubber</u>

The above listed sources are subject to a visible emissions (VE) and a particulate matter (PM) emissions limitation requirement of 5 percent % opacity and 0.01 gr/dscf (applicant requested limitation, which is more stringent than what is allowed by rule), respectively, in accordance with Rule 62 \pm 7-296.711, F.A.C. Initial and subsequent compliance tests shall be conducted for VE and PM emissions using EPA Methods 9 and 5, respectively, in accordance with Rule 62 \pm 7-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version).

- c. Fugitive emissions from the following material handling and transport sources shall be controlled as follows:

<u>Coal Car Unloading:</u>	<u>Wet Suppression using continuous water sprays during unloading.</u>
<u>Dry Ash Rail Car Loadout:</u>	<u>Using closed or covered containers under negative air pressures during ash loadout; and using water sprays prior to removal of rail car loadout cap when loading open rail cars.</u>

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The above listed sources are subject to a visible emission (VE) limitation requirement of five percent (5%) opacity in accordance with Rule 62-296.711, F.A.C. Initial and subsequent compliance tests shall be conducted for VE using EPA Method 9 or other FDEP approved methods in accordance with Rule 62-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version). Initial visible emission testing shall be conducted within 90 days after final DEP approval of these facilities or within 90 days after completion of construction of the source, whichever occurs last. Ash shipped in open rail cars will either be pelletized or be sprayed with water to create a crust on the top layer of non-pelletized ash. Removal of bottom and fly ash from the Project site by any means other than by rail shall require the prior approval of DEP and RESD of the method(s) of fugitive emissions control.

7. The maximum emissions from each of the Limestone Pulverizers/Conveyors (including limestone dryer) limestone dryers shall not exceed the following: ~~while using oil shall not exceed the following (based on AP-42 factor, Table 1, 3-1, Industrial Distillate, 10/86)~~

Estimated Limitations

<u>Pollutant</u>	<u>lbs/hr</u> <u>Dryers</u>	<u>TPY</u>	<u>TPY for 2 Pulverizers/Conveyors</u>
PM/PM ₁₀	<u>1.26*</u> 0.24	<u>1.68</u> 0.32	<u>3.36</u> 0.64
SO ₂	0.85	1.15	2.3
CO	0.60	0.81	1.62
NO _x	2.40	3.25	6.5
VOC	0.05	0.06	0.12

The emissions for SO₂, CO, NO_x, and VOC are based on AP-42 factor, Table 1, 3-1, Industrial Distillate, 10/86.

* This reflects the emission limitation for the limestone pulverizers/conveyor in Condition II.B.4.a. and limits the emission for the Limestone Pulverizers/Conveyors and the dryer.

Visible emissions from the limestone pulverizers/conveyors dryers shall not exceed 5% opacity.

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A copy of this letter shall be attached to the above mentioned permit, No. PSD-FL-137(B), and shall become a part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sa/t

cc: C. Kirts, NED
S. Pace, RESD
H. Oven, PPS
J. Harper, EPA
J. Bunyak, NPS
D. Roberts, HGS&S

Final Determination

The permit amendment to the material handling systems for ash pelletization, coal unloading, dry ash loading and removal, and limestone pulverizers/conveyors for Cedar Bay Cogeneration, located in Duval County, Florida, was distributed on July 5, 1995. The Notice of Intent to Issue was published in the Florida Times Union on July 17, 1995. Copies of the amendment were available for public inspection at the Department Offices in Jacksonville and Tallahassee.

No comments were submitted by the National Park Service and the U.S. Environmental Protection Agency. Comments were submitted by the applicant relating to typographical errors in the draft permit amendment. The Department agrees with those findings by the applicant, and appropriate changes were made.

The final action of the Department will be to issue the PSD permit (PSD-FL-137B) with the changes noted above.