

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

March 2, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jeffrey Walker
Cedar Bay Cogenerating Company, L.P.
9640 Eastport Road
Jacksonville, FL 32226

Re: Request for Additional Information
Title-V Renewal Application
File No. 0310337-007-AV
Cedar Bay Cogenerating Project

Dear Mr. Walker:

The Department is in receipt of your Title V Renewal application, however in order to continue processing the application, we will need the additional information 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.

Boilers A, B & C (EU 001, 002 & 003)

1. CAM is applicable for monitoring the control of particulate matter (PM) emissions from the baghouses. The proposal to use the COMS and recorded opacity as an indicator of compliance with the PM emissions limit is not the best choice. Experience has shown that there is not always a consistent and reliable correlation between opacity and actual PM emissions; however, it can be considered for use if a demonstration is presented that verifies a direct relationship between the COMS readings and the PM emission rates. To do so, please provide a table of data that documents the tested PM emission rate, the simultaneous opacity reading from the COMS, the test date, the operational rate during the test, and the allowable capacity of the unit. It should be noted that with normal opacity readings in the range of 3 – 7%, the choice of 15% opacity as an excursion level is not likely to be approved.
2. If a direct correlation can not be demonstrated between the opacity and PM readings, consider the possibility of using the pressure drop across the baghouse as an indicator range instead of opacity. If this appears to be more reliable, please identify an indicator range for the pressure drop across the baghouses (maximum and minimum) and provide a table of data that documents the tested PM emission rate, the simultaneous pressure drop across the baghouse, the test date, the operational rate during the test, and the allowable capacity of the units.

Material Handling Units with Baghouses

3. The non-applicability determination for the baghouses, with respect to CAM, is somewhat questionable due to the use of a baghouse efficiency factor of only 99%. The efficiency of a

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baghouse is generally accepted to be closer to 99.9%. Using the permitted emission rates and applying an efficiency factor of 99.9% provides results that implies all of the material handling baghouses are subject to CAM due to pre-control potential emissions being greater than 100 tpy. However, this is not the only acceptable method of determining pre-control potential emissions for CAM purposes. AP-42 emission factors (or similar) combined with operator knowledge of the process may be used if justified, as well as vendor guarantees. Please re-evaluate the applicability determinations for these units and either supply the rationale and justification of the baghouse efficiencies or explore other methods of determining pre-control potential emissions. If the pre-control emissions can not be adequately justified, CAM plans will need to be submitted.

Please make the appropriate changes resulting from the above comments and resubmit the required CAM plans. Also include and electronic copy of the CAM plans as a Word (.doc) file.

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. Please note that per Rule 62-4.055(1): *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."*

If you have any questions, please call Michael P. Halpin, P.E. at 850/921-9519.

Sincerely,



Michael P. Halpin, P.E.

DARM/BAR

North Permitting Section

Martin Kreft, Cedar Bay
George Lipka, P.E. EarthTech
James L. Manning, P.E. RESD
Chris Kirts, DEP-NED

U.S. Postal Service
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Mr. Jeffrey Walker

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 or PO Box No. 9640 Eastport Road
 City, State, ZIP+4
 Jacksonville, Florida 32226
 PS Form 3800, January 2001 See Reverse for Instructions

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 Mr. Jeffrey Walker
 Cedar Bay Cogenerating Company
 L.P.
 9640 Eastport Road
 Jacksonville, Florida 32226

2. Article Number
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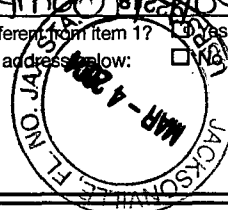
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