



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 11, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Byron Veech
Environmental, Safety & Health Coordinator
Indiantown Cogeneration, L.P.
Post Office Box 1799
19140 Southwest Warfield Blvd.
Indiantown, Florida 34956

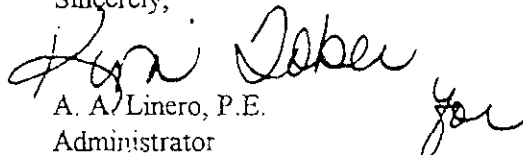
Dear Mr. Veech:

RE: Amendment Fee - Indiantown Cogen Facility

The Bureau of Air Regulation received your March 11 letter concerning the above referenced facility. Since this request is being reviewed under site certification, no further processing fee is required for the Permit to Construct amendment. Enclosed is your check number 0745 for \$250 which was submitted with your request.

If you have any questions, please call Kim Tober at (850)921-9533.

Sincerely,


A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/kt

cc: M. Costello, BAR

Indiantown Cogeneration, L.P.

sent check back 11 Mar. '98

March 10, 1998

RECEIVED

Mr. Al Linero
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

MAR 11 1998

BUREAU OF
AIR REGULATION

VIA FACSIMILE/FEDERAL EXPRESS OTHERWISE DELETE

Re: Amendment Fee

Dear Mr. Linero:

Enclosed is the \$250.00 fee for the Permit to Construct Amendment. The Permit to Construct Amendment paperwork has been forwarded to you previously.

Sincerely,



Byron Veech
Environmental, Safety and Health Coordinator

Enclosure: 1



Indiantown Cogeneration, L.P.

February 27, 1998

Mr. Al Linero
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

VIA FEDERAL EXPRESS

Re: Indiantown Cogeneration, L.P. Preconstruction Permit Amendment

Dear Mr. Linero:

Enclosed is Indiantown Cogeneration, L.P.'s application to amend their preconstruction permit, PSD-FL-168. Indiantown Cogeneration is operating under this permit while the Title V Operating Permit Application is under review.

This amendment is to correct an oversight in the visible emissions' limitation for the pulverized coal fired main boiler. The permit limits the visible emissions from this source to 10% opacity during normal operation, but does not provide for exceptional circumstances. To be consistent with the federal New Source Performance Standards (NSPS) for this source, we are requesting one 6-minute period per hour of opacity up to 27%. This would allow for maintenance of the system (bag changes, etc.).

No pollutant emission rates are affected. Page 44 of the application shows the new requested allowable opacity. The other information in the enclosed application is identical to that listed in the Title V Operating Permit Application currently under review by Tom Cascio, (FDEP) and is consistent with the current permit. We have discussed this application with Tom, and our goal is to obtain approval of this application in time to have the change incorporated into the Title V Operating Permit.

No attachments are provided in this application because they are available as part of the Title V Operating Permit application. If you need any additional data, or copies of the data submitted with the Title V Operating permit application, please contact us.

RECEIVED

MAR 10 1998

BUREAU OF
AIR REGULATION



We have also included a check for \$250. Based on our review of the permit fee schedule in Rule 62-4, this is our best interpretation of the appropriate fee for a permit modification of this type. If a different fee (or no fee) should be submitted, please contact us.

If you have any questions, please contact myself at (561) 597-6500 or A.J. Jablonowski, consultant with Earthtech at (978) 371-4339.

Sincerely,



Steve Sorrentino
Plant Director

Enclosure: 1

bc: V. Zambito
B. Veech
M. Golden
V. Gill

cc: Hamilton "Buck" Owen, FDEP, Tallahassee
Tom Tittle, FDEP, SE District
Doc. Control No.: 980522
Project File: 6.3.1.5

cc: J. Cascio, BARR

561 597 6520 Fax

HUNTSMAN

MATERIAL SAFETY DATA SHEET

READ AND UNDERSTAND MATERIAL SAFETY DATA SHEET BEFORE HANDLING OR DISPOSING OF PRODUCT

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
DATE ISSUED : 7/30/97
DATE PRINTED : 2/4/99

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

MATERIAL IDENTITY

PRODUCT CODE AND NAME
MEA MONOETHANOLAMINE, MEA

→ Not[Ⓢ] Listed Haz Waste
 Ⓢ Flammable < 140°F
 Above 5000 Btu/Lb

Chemical Name and/or Family or Description:

Alkanolamine

COMPANY INFORMATION

Huntsman Petrochemical Corporation
 P.O. Box 27707
 Houston, TX 77227-7707

TELEPHONE NUMBERS

Transportation Emergency
 Company: (409) 727-0831
 CHEMTREC: (800) 424-9300
 Medical Emergency: (409) 722-9673 (24 Hour)
 General MSDS Assistance: (713) 235-6432
 Technical Information: (512) 459-6543

2. COMPOSITION AND INFORMATION ON INGREDIENTS

THE CRITERIA FOR LISTING COMPONENTS IN THE COMPOSITION SECTION ARE AS FOLLOWS: CARCINOGENS ARE LISTED WHEN PRESENT AT 0.1 % OR GREATER; COMPONENTS WHICH ARE OTHERWISE HAZARDOUS ACCORDING TO OSHA ARE LISTED WHEN PRESENT AT 1.0 % OR GREATER; NON-HAZARDOUS COMPONENTS ARE LISTED AT 3.0 % OR GREATER. THIS IS NOT INTENDED TO BE COMPLETE COMPOSITIONAL DISCLOSURE. REFER TO SECTION 14 FOR APPLICABLE STATES' RIGHT TO KNOW AND OTHER REGULATORY INFORMATION.

Product and/or Component(s) Carcinogenic According to:

OSHA IARC NTP OTHER NONE X

Composition:

Chemical Name	CAS Number	Exposure Limits	Range in %
Ethanol, 2-amino-	141-43-5	6 ppm STEL-ACGIH	100
		3 ppm TWA-OSHA	
		6 ppm STEL-OSHA	
		3 ppm TWA-ACGIH	

THIS PRODUCT IS CONSIDERED HAZARDOUS ACCORDING TO OSHA (1910.1200).

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
DATE ISSUED : 7/30/97
DATE PRINTED : 2/4/99
COMPANY : HUNTSMAN

3. HAZARD IDENTIFICATION

EMERGENCY OVERVIEW

Appearance:

Clear liquid

Odor:

Ammonia-like odor

WARNING STATEMENT

DANGER !

**CORROSIVE - CAUSES EYE AND SKIN BURNS
 HARMFUL OR FATAL IF SWALLOWED
 MAY CAUSE DIZZINESS AND DROWSINESS
 CAUSES RESPIRATORY TRACT IRRITATION AND CAN CAUSE DAMAGE
 ASPIRATION HAZARD IF SWALLOWED -
 CAN ENTER LUNGS AND CAUSE DAMAGE
 MAY CAUSE LIVER AND KIDNEY DAMAGE BASED ON ANIMAL DATA**

**Hazardous Material
 Information System
 (United States)**

Health	3
Fire	1
Reactivity	0
Personal protection	

**National Fire Protection
 Association NFPA (United
 States)**



POTENTIAL HEALTH EFFECTS

Primary Route of Exposure

Eye X Skin X Inhalation X Ingestion

Effects of Overexposure

Acute:

Eyes: Causes irritation, experienced as pain, with excess blinking and tear production, and seen as extreme redness and swelling of the eye and chemical burns of the eye. Severe eye damage may cause blindness.

Skin: Causes severe irritation with pain, severe excess redness and swelling with chemical burns, blister formation, and possible tissue destruction. Other than the potential skin irritation effects noted above, acute (short term) adverse effects are not expected from brief skin contact; see other effects, below, and Section 11 for information regarding potential long term effects.

Inhalation: Vapors or mist, especially as generated from heating the material or as from exposure in poorly ventilated areas or confined spaces, are irritating and cause nasal discharge, coughing, and discomfort in nose and throat. Prolonged or repeated overexposure may result in lung damage. Inhalation may cause dizziness, drowsiness, euphoria, loss of coordination, disorientation, headache, nausea, and vomiting. In poorly ventilated areas or confined spaces, unconsciousness and asphyxiation may result. Prolonged or repeated overexposure may result in the absorption of potentially harmful amounts of material.

Ingestion: Causes burning of mouth, throat, and stomach with abdominal and chest pain, nausea, vomiting, diarrhea, thirst, weakness, and collapse. Aspiration may occur during swallowing or vomiting, resulting in lung damage.

Sensitization Properties: Unknown

Chronic:

Repeated skin contact may cause a persistent irritation or dermatitis. Repeated inhalation may cause lung damage.

Medical Conditions Aggravated by Exposure:

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
DATE ISSUED : 7/30/97
DATE PRINTED : 2/4/99
COMPANY : HUNTSMAN

Skin contact may aggravate an existing dermatitis (skin condition). Overexposure to vapor, dust or mist may aggravate existing respiratory conditions, such as asthma, bronchitis, and inflammatory or fibrotic respiratory disease. Repeated overexposure may aggravate existing liver or kidney disease.

Other Remarks:

This product contains one or more amines which may produce temporary and reversible hazy or blurred vision. Symptoms disappear when exposure is terminated.

4. FIRST AID MEASURES

Eyes:

Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart while flushing to rinse entire surface of eye and lids with water. Do not attempt to neutralize with chemical agents. Obtain medical attention immediately. Continue flushing for an additional 15 minutes if medical attention is not immediately available.

Skin:

Immediately remove contaminated clothing and shoes. Under a safety shower, flush skin thoroughly with large amounts of running water for at least 15 minutes. Do not attempt to neutralize with chemical agents. Get medical attention immediately. Discard or decontaminate clothing and shoes before reuse.

Ingestion:

If person is conscious and can swallow, immediately give two glasses of water (16 oz.) but do not induce vomiting. This material is corrosive. If vomiting occurs, give fluids again. Have a physician determine if condition of patient will permit induction of vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious or convulsing person.

Inhalation:

If inhaled, remove to fresh air. If not breathing or in respiratory distress, clear person's airway and start artificial respiration. With a physician's advice, give supplemental oxygen using a bag-valve mask or manually triggered oxygen supply.

Other Instructions:

Swallowing of this corrosive material may result in severe ulceration, inflammation, and possible perforation of the upper alimentary tract, with hemorrhage and fluid loss. Aspiration of this product during induced emesis can result in severe lung injury. If evacuation of stomach is necessary, use method least likely to cause aspiration, such as gastric lavage after endotracheal intubation. Contact a Poison Control Center for additional treatment information.

5. FIRE-FIGHTING MEASURES

Ignition Temperature - AIT (degrees C):

Not determined.

Flash Point (degrees C):

95.5 (204 F) (PMCC)

Flammable Limits % (Lower-Upper):

Lower: 5

Upper: 17

Recommended Fire Extinguishing Agents And Special Procedures:

Use water spray, dry chemical, foam, or carbon dioxide to extinguish flames. Use water spray to cool fire-exposed containers. Water or foam may cause frothing.

Unusual or Explosive Hazards:

None

Special Protective Equipment for Firefighters:

Wear special chemical protective clothing and positive pressure self-contained breathing apparatus. Approach fire from upwind to avoid hazardous vapors and toxic decomposition products. Decontaminate or discard any clothing that may contain chemical residues.

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
DATE ISSUED : 7/30/97
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COMPANY : HUNTSMAN

6. ACCIDENTAL RELEASE MEASURES (Transportation Spills: CHEMTREC (800)424-9300)

Procedures in Case of Accidental Release, Breakage or Leakage:

Ventilate area. Avoid breathing vapor. Wear appropriate personal protective equipment, including appropriate respiratory protection. Contain spill if possible. Wipe up or absorb on suitable material and shovel up. Prevent entry into sewers and waterways. Avoid contact with skin, eyes or clothing.

7. HANDLING AND STORAGE

Precautions to be Taken in

Handling:

Minimum feasible handling temperatures should be maintained. Eye wash and safety shower should be available nearby when this product is handled or used.

Storage:

Periods of exposure to high temperatures should be minimized. Water contamination should be avoided.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Protective Equipment (Type)

Eye/Face Protection:

Avoid eye contact. Chemical type goggles with face shield must be worn. Do not wear contact lenses.

Skin Protection:

Protective clothing such as coveralls or lab coats must be worn. Launder or dry-clean when soiled. Gloves resistant to chemicals and petroleum distillates required. When handling large quantities, impervious suits, gloves, and rubber boots must be worn.

Remove and dry-clean or launder clothing soaked or soiled with this material before reuse. Dry cleaning of contaminated clothing may be more effective than normal laundering. Inform individuals responsible for cleaning of potential hazards associated with handling contaminated clothing.

Respiratory Protection:

Airborne concentrations should be kept to lowest levels possible. If vapor, mist or dust is generated and the occupational exposure limit of the product, or any component of the product, is exceeded, use appropriate NIOSH or MSHA approved air purifying or air supplied respirator after determining the airborne concentration of the contaminant. Air supplied respirators should always be worn when airborne concentration of the contaminant or oxygen content is unknown.

Ventilation:

Adequate to meet occupational exposure limits (see below).

Exposure Limit for the Total Product:

Monoethanolamine (ethanolamine): OSHA PEL-TWA 3.0 ppm; STEL 6.0 ppm

ACGIH TLV-TWA 3.0 ppm; STEL 6.0

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance:

Clear liquid

Odor:

Ammonia-like odor

Boiling Point (degrees C):

170.5 (339 F)

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
DATE ISSUED : 7/30/97
DATE PRINTED : 2/4/99
COMPANY : HUNTSMAN

Melting/Freezing Point (degrees C):

10.5 (51 F)

Specific Gravity (water=1):

1.02

pH:

11.8

Vapor Pressure:

.2 mmHg at 20 C (68 F)

Viscosity:

23.6 cSt at 20 C (68 F)

VOC Content:

98% by ASTM D 2369

Vapor Density (Air=1):

2.1

Solubility in Water (%):

>10

Other:

None

10. STABILITY AND REACTIVITY**This Material Reacts Violently With:**

Air Water Heat Strong Oxidizers Others X None of these

Comments:

This material reacts violently with acids.

Products Evolved When Subjected to Heat or Combustion:

Toxic levels of ammonia, combustion products of nitrogen, carbon monoxide, carbon dioxide, irritating aldehydes and ketones may be formed on burning in a limited air supply.

Hazardous Polymerizations:

DO NOT OCCUR

11. TOXICOLOGICAL INFORMATION**TOXICOLOGICAL INFORMATION (ANIMAL TOXICITY DATA)****Oral:**

LD50 Believed to be > 1.00 - 2.00 g/kg (rat) moderately toxic

Inhalation:

Not determined.

Dermal:

LD50 1.00 g/kg (rabbit) slightly toxic

IRRITATION INDEX, ESTIMATION OF IRRITATION (SPECIES)**Skin:**

(Draize) Believed to be > 6.50 - 8.00 /6.0 (rabbit) corrosive

Eyes:

(Draize) Believed to be > 80.00 - 110.00 /110 (rabbit) extremely irritating

Sensitization:

Not determined.

Other:

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
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COMPANY : HUNTSMAN

Prolonged and repeated ingestion of monoethanolamine has caused kidney and liver damage in laboratory animals. In addition, a developmental toxicity study, using unconventional statistical treatment of the data, demonstrated developmental toxicity in rats. The true significance of the study data is not clear, since a full re-interpretation of this data is not possible at this time. Additional or repeat studies are planned or underway to better define the toxic potential of this product, or to verify the results obtained from previous animal studies.

12. DISPOSAL CONSIDERATIONS:

Waste Disposal Methods:

This product has been evaluated for RCRA characteristics and does not meet the criteria of a hazardous waste if discarded in its purchased form. Under RCRA, it is the responsibility of the user of the product to determine at the time of disposal, whether the product meets RCRA criteria for hazardous waste. This is because product uses, transformations, mixtures, processes, etc. may render the resulting materials hazardous.

Remarks:

None

13. TRANSPORT INFORMATION

Transportation

DOT:

Proper Shipping Name:

Ethanolamine

Hazard Class:

8

Identification Number:

UN 2491

Packing Group:

III

Label Required:

Corrosive

IMDG

Proper Shipping Name:

Not evaluated

ICAO

Proper Shipping Name:

Not evaluated

TDG

Proper Shipping Name:

Ethanolamine

Hazard Class:

8

Identification Number:

UN 2491

Label Required:

Corrosive

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
DATE ISSUED : 7/30/97
DATE PRINTED : 2/4/99
COMPANY : HUNTSMAN

14. REGULATORY INFORMATION

Federal Regulations:

SARA Title III:

Section 302/304 Extremely Hazardous Substances

Chemical Name	CAS Number	Range in %	TPQ	RQ
None.				

Section 311 Hazardous Categorization:

Acute X Chronic X Fire Pressure Reactive N/A

Section 313 Toxic Chemical

Chemical Name	CAS Number	Concentration
None.		

CERCLA 102(a)/DOT Hazardous Substances:

Chemical Name	CAS Number	Range in %	RQ
None.			

States Right-to-Know Regulations:

Chemical Name	State Right-to-know
Ethanol, 2-amino-	CT, FL, IL, MA, NJ, PA, RI

State list: CT (Connecticut), FL (Florida), IL (Illinois), MI (Michigan), LA (Louisiana), MA (Massachusetts), NJ (New Jersey), PA (Pennsylvania), RI (Rhode Island)

California Prop. 65:

The following detectable components of this product are substances, or belong to classes of substances, known to the State of California to cause cancer and/or reproductive toxicity.

Chemical Name	CAS Number
None.	

INTERNATIONAL REGULATIONS:

TSCA Inventory Status:

This product, or its components, are listed on or are exempt from the the Toxic Substance Control Act (TSCA) Chemical Substance Inventory.

WHMIS Classification:

Class E: Corrosive

Canadian Inventory Status:

This product, or its components, are listed on or are exempt from the Canadian Domestic Substance List (DSL).

EINECS Inventory Status:

This product, or its components, are listed on or are exempt from the European Inventory of Existing Chemical Substances (EINECS) or the European List of Notified Chemical Substances (ELINCS).

Australian Inventory Status:

This product, or its components, are listed on or are exempt from the Australian Inventory of Chemical Substances (AICS).

Japan Inventory Status:

This product, or its components, are listed on or are exempt from the Japan Ministry of International Trade and Industry (MITI) inventory.

PRODUCT CODE AND NAME : MEA MONOETHANOLAMINE, MEA
DATE ISSUED : 7/30/97
DATE PRINTED : 2/4/99
COMPANY : HUNTSMAN

15. ENVIRONMENTAL INFORMATION

Aquatic Toxicity:

LC50-96hr Aquatic toxicity rating is > 100.00 - 1000.00 ppm practically non-toxic

Mobility:

This product is expected to be mobile in soil and not be expected to adsorb to suspended solids or sediments in water.

Persistence and Biodegradability:

This product undergoes moderate biodegradation and is not expected to be persistent in the environment.

Potential to Bioaccumulate:

This product is not expected to bioaccumulate. $K_{ow} = -1.31$

Remarks:

None

16. OTHER INFORMATION 7/30/97

None

THE INFORMATION CONTAINED HEREIN IS BELIEVED TO BE ACCURATE. IT IS PROVIDED INDEPENDENTLY OF ANY SALE OF THE PRODUCT FOR PURPOSE OF HAZARD COMMUNICATION AS PART OF HUNTSMAN'S PRODUCT SAFETY PROGRAM. IT IS NOT INTENDED TO CONSTITUTE PERFORMANCE INFORMATION CONCERNING THE PRODUCT. NO EXPRESS WARRANTY, OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE IS MADE WITH RESPECT TO THE PRODUCT OR THE INFORMATION CONTAINED HEREIN. DATA SHEETS ARE AVAILABLE FOR ALL HUNTSMAN PRODUCTS. YOU ARE URGED TO OBTAIN DATA SHEETS FOR ALL HUNTSMAN PRODUCTS YOU BUY, PROCESS, USE OR DISTRIBUTE AND YOU ARE ENCOURAGED AND REQUESTED TO ADVISE THOSE WHO MAY COME IN CONTACT WITH SUCH PRODUCTS OF THE INFORMATION CONTAINED HEREIN.

TO DETERMINE APPLICABILITY OR EFFECTS OF ANY LAW OR REGULATION WITH RESPECT TO THE PRODUCT, USER SHOULD CONSULT HIS LEGAL ADVISOR OR THE APPROPRIATE GOVERNMENT AGENCY. HUNTSMAN DOES NOT UNDERTAKE TO FURNISH ADVICE ON SUCH MATTERS.

Supercodes: 2/26/97

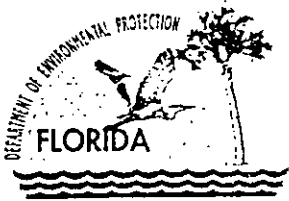
The following section has been revised: 4, 8

Date Issued: 7/30/97.

Verified by Phillip B. Valkovich.

Inquiries regarding MSDS should be directed to:

HUNTSMAN
Coordinator, Product Safety
P.O. Box 27707
Houston, TX 77227-7707



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 13, 1996

Mr. Stephen A. Sorrentino
Indiantown Cogeneration, L.P.
Post Office Box 1799
Indiantown, Florida 34956

Re: Indiantown Cogeneration Project, PA 90-31

Dear Mr. Sorrentino:

I have reviewed your November 2, 1996, letter to Mr. Clair Fancy concerning the deletion of EPA Method 8 for stack testing. While such a deletion from PSD-FL 168 may be approvable by the Division of Air Resources Management, the corresponding deletion from the Conditions of Certification requires a modification process. If you wish to proceed with a modification on this matter, you may wish to also include the following modification as well that will make amendments to a PSD permit automatically modify the corresponding Conditions of Certification:

This certification shall be automatically modified to conform to any subsequent amendments, modifications, or renewals made by DEP under a federally delegated or approved program to any separately issued Prevention of Significant Deterioration (PSD) permit, Title V Air Permit, or National Pollutant Discharge elimination System (NPDES) permit for the certified facility. ICL shall send each party to the original certification proceedings (at the party's last known address as shown in the record of such proceeding) notice of requests submitted by ICL for modifications or renewals of the above listed permits if the request involves a relief mechanism (e.g., mixing zone, variance, etc.) from state standards, a relaxation of conditions included in the permit due to state permitting requirements, or the inclusion of less restrictive air emission limitations in the air permits. DEP shall notify all parties to the certification proceeding of any intent to modify conditions under this section prior to taking final agency action.

Please confirm that you would like to proceed with the Method 8 modification and the generic federal permit modification.

Sincerely,

Hamilton S. Oven, PE.
Administrator, Siting
Coordination Office

Indiantown Cogeneration, L.P.

November 2, 1996

Mr. Clair Fancy
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blainstone Road
Tallahassee, FL 32399-2400

VIA FEDERAL EXPRESS

Re: *Administrative Modification to Permit PSD-FL 168 & PA 90-31*

Dear Mr. Fancy

Indiantown Cogeneration L.P.(ICLP), has identified the need to modify our existing PSD permit. Based on conversations with Martin Costello of the Bureau of Air Regulation, we have determined that PSD Specific Condition 19, requiring ICLP to perform Sulfuric Acid Mist testing, is not applicable.

Background

As you will recall, this facility was designed to burn a medium to low sulfur coal with a dry scrubber unit producing a reduction in SO₂ significantly greater than 70 %. During the initial performance testing of the plant in December 1995, ICLP made several attempts using EPA Method 8 as required by Specific Condition 19. After three runs with erratic results it was determined that due to flue gas conditions and probable interferences from ammonia and chlorides in the flue gas, the standard Method 8 approach would not produce valid results. The testing contractor Clean Air Engineering (CAE) had experience with these types of interferences and recommended an alternate approach using a Modified Method 8. ICLP requested that CAE run a Modified Method 8 at that time to attempt to achieve a valid result, which was reported along with the test results from the initial testing using the reference method.

In discussions with the FDEP Southeast District Office, it was determined that since the modified method was not approved and no audit samples were run, the test was not accepted. The SE District has suggested that ICLP request approval of the Modified Method 8 procedure and run the test during the scheduled 4th quarter 1996, performance testing.



Mr. Fancy
November 2, 1996
Page 2

Upon submitting the Amendment to Standard Procedure (ASP) for the modified method, Byron Veech was contacted by Martin Costello to discuss the application. After reviewing the issues, test results and the design of the plant with Mr. Costello, it was determined that the original requirement for (H₂ SO₄) acid mist testing should not have been included in the PSD permit.

Request:

ICLP is thereby requesting that the ASP application for a Modified Method 8 be withdrawn and that a minor amendment be made to the Indiantown Cogeneration L. P. permit, PSD-FL-168. Specifically, we are requesting that the PSD permit be modified to remove Specific Condition 19 for H₂ SO₄ acid mist testing from the list of required emission limitation standards. ICLP is enclosing a check for \$250.00 for this modification as required by 62-4.050(4)(r)(5).

Rationale:

ICLP has based this request on the fact that EPA Method 8 was developed for sulfuric acid plants at which the flue gas is dry and free of interference. The use of this method at a coal fired plant with high flue gas moisture content, low backend temperature and interference such as ammonia and chlorides does not provide valid results. Additionally, since the plant performance in terms of SO₂ reduction is more than adequate because of the low sulfur content and the high level of emissions control, the expected level of this pollutant is well below required levels.

If you have any questions regarding this request please contact, Byron Veech or me at (561) 597-6500.

Sincerely,



Stephen A. Sorrentino
Project Director

BWV

Enclosure - \$250.00 for minor modification fee.

Mr. Fancy
November 2, 1996
Page 3

cc: Hamilton "Buck" Owen FDEP
M. Harley FDEP BAR
M. Costello FDEP BAR
T. Tittle FDEP SE, District Office
R. Neginsky FDEP SE District Office

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NOV 12 1996

**BUREAU OF
AIR REGULATION**

Marty
Indiantown Cogeneration, L.P.

October 29, 1996

Ms. Raisa Neginsky
Department of Environmental Protection
PO Box 15425
400 South Congress Avenue
West Palm Beach, FL 33416

VIA FEDERAL EXPRESS

RE: Indiantown Generating Plant
COM's Initial Certification
Permit Nos.: PSD-FL-168 & PA 90-31

Dear Raisa:

This letter is in response to your letter of September 5, 1996 regarding the PC Boiler Continuous Emissions Monitoring System (COMS) Certification. As allowed in 40 CFR 60.13(c) a Continuous Opacity Monitors performance evaluation shall be completed before the performance testing is done as described in 40 CFR 60.8. At the time the Relative Accuracy Test Audits (RATA) was performed in December 1995, no additional certification of the COMs was performed. The performance evaluation, including the "Calibration Error Test", which requires the use of certified test filters, was completed by the manufacturer during the factory acceptance testing on December 23, 1995. This testing was attended by US Generating personnel.

The three neutral density test filters that were used in the testing were filter serial numbers; L - (Low), M- (medium) & H - (high). These filters were certified as documented in the RATA report, attached is the certification doc, note that the certification was completed on July 24, 1994. Since the filter certification is good for one year, we submit that the opacity meter is indeed certifiable by your department.

Attached to this letter are the results of the four manufacturers Calibration Error Tests. All Filter Certifications were performed on July 21, 1996. Enclosed in the original RATA report were the following documents:

- Opacity Factory Certification
- Neutral Density Filter Certification Report for L Filter
- Neutral Density Filter Certification Report for M Filter
- Neutral Density Filter Certification Report for H Filter



RECEIVED

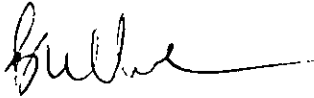
NOV 4 1996

BUREAU OF
AIR REGULATION

Identification	Range	Value
Neutral Density Filter - L	Low Range Filter	7.98 % Opacity
Neutral Density Filter - M	Mid Range Filter	25.03 % Opacity
Neutral Density Filter - H	High Range Filter	65.01 % Opacity

Please contact me at (407) 597-6500 extension 19 if you have any questions..

Sincerely,



B W Veech
ES & H Coordinator

Enclosure (4)

cc: Tom Tittle, FDEP SE District
Martin Costello FDEP BAM