



File

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 11, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Michelle Griffin
Indiantown Cogeneration Facility
Post Office Box 1620
Indiantown, Florida 34956

RE: Indiantown Cogeneration, L. P.
PSD-Fl-168; Permit Modification

Dear Ms Griffin:

The Department received your letter on June 9, 1995, requesting to revise Specific Conditions No. 19 to use EPA Reference Methods 3, 3A, 5, 7E, 18, and 25A instead of EPA Reference Methods 3, 7, 7C, 19, 201, 201A, 18 and 25.

The Department evaluated your request and will allow you to change all proposed Reference Methods except for EPA VOC Reference Methods 18 and 25A. Please refer to the attached FDEP Guidance Memo dated March 17, 1994, and submit a request for an Alternate Standard Procedure (ASP) addressed to Mike Harley of the DEP Emission Monitoring Section.

As indicated above Specific Condition No. 19 will be changed as follows:

SPECIFIC CONDITION No. 19

FROM:

Compliance with emission limitations standards shall be demonstrated using EPA Methods, as contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources), or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants), or any other method approved by the Department and EPA, in accordance with F.A.C. Rule 17-2.700.

Ms. Michelle Griffin
July 11, 1995
Page Two

| <u>EPA Method</u> | <u>For Determination of</u> |
|-------------------|--|
| 1 | Selection of sample site and velocity traverses |
| 2 | Stack gas flow rate when converting concentrations to or from mass emission limits. |
| 3 | Gas analysis when needed for calculation of molecular weight or percent O ₂ . |
| 4 | Moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits. |
| 5 | Particulate matter concentration and mass emissions. |
| 201 or 201A | PM ₁₀ emissions. |
| 6, 6C, or 19 | Sulfur dioxide emissions from stationary sources. |
| 7, 7C, or 19 | Nitrogen oxide emissions from stationary sources. |
| 8 | Sulfuric acid mist from stationary source. |
| 9 | Visible emission determination of opacity. - At least three one hour runs to be conducted simultaneously with particulate testing for the emissions from dry scrubber/baghouse, and ash handling building baghouse. - At least one lime vehicle unloading into the lime silo (from start to finish). |
| 22 | Fugitive emissions from transfer points. |
| 10 | Carbon monoxide emissions from stationary sources. |
| 12 or 101A | Lead Concentration from stationary sources. |

Ms. Michelle Griffin
July 11, 1995
Page Three

| | |
|-------------|--|
| 13A or 13B | Fluoride emissions from stationary sources. |
| 18 or 25 | Volatile organic compounds concentration. |
| 101A or 108 | Mercury emissions. |
| 104 | Beryllium emission rate and associated moisture content. |

Note: Use EPA draft method or other methods approved by Department to test for ammonia.

TO:

Compliance with emission limitations standards shall be demonstrated using EPA Methods, as contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources), or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants), or any other method approved by the Department and EPA, in accordance with F.A.C. Chapter 62.297.

| <u>EPA Method</u> | <u>For Determination of</u> |
|-------------------|--|
| 1 | Selection of sample site and velocity traverses |
| 2 | Stack gas flow rate when converting concentrations to or from mass emission limits. |
| 3 & 3A | Gas analysis when needed for calculation of molecular weight or percent O ₂ . |
| 4 | Moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits. |
| 5 | Particulate matter concentration and mass emissions. |
| 6, 6C, or 19 | Sulfur dioxide emissions from stationary sources. |
| 7E | Nitrogen oxide emissions from stationary sources. |

Ms. Michelle Griffin
July 11, 1995
Page four

- 8 Sulfuric acid mist from stationary source.
- 9 Visible emission determination of opacity.
 - At least three one hour runs to be conducted simultaneously with particulate testing for the emissions from dry scrubber/baghouse, and ash handling building baghouse.
 - At least one lime vehicle unloading into the lime silo (from start to finish).
- 22 Fugitive emissions from transfer points.
- 10 Carbon monoxide emissions from stationary sources.
- 12 or 101A Lead Concentration from stationary sources.
- 13A or 13B Fluoride emissions from stationary sources.
- 18 and 25 Volatile organic compounds concentration.
- 101A or 108 Mercury emissions.
- 104 Beryllium emission rate and associated moisture content.

Note: Use EPA draft method or other methods approved by Department to test for ammonia.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner

Ms. Michelle Griffin
July 11, 1995
Page Five

shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

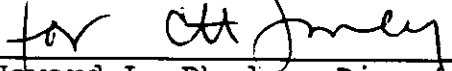
- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

Ms. Michelle Griffin
July 11, 1995
Page Six

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit PSD-FL-168.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

This is to certify that this Permit Amendment and all copies were mailed to the listed persons before the close of business on _____.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
Chapter 120.52(9), Florida
Statutes, with the designated
Deputy Clerk, receipt of which
is hereby acknowledged.

(Clerk)

(Date)

Enclosure: Ms Griffin's letter received on June 9, 1995

Copies furnished to:

John Bunyak, NPS
Jewell A. Harper, EPA
Isidore Goldman, SED
Mike Harley, DARM

Is your RETURN ADDRESS completed on the reverse side?

| | |
|---|---|
| <p>SENDER:</p> <ul style="list-style-type: none"> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered. | <p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p> |
| <p>3. Article Addressed to:</p> <p>Ms. Michelle Griffin Indiantown Cogeneration Facility Post Office Box 1620 Indiantown, Florida 34956</p> | <p>4a. Article Number</p> <hr/> <p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> |
| <p>5. Signature (Addressee)</p> <p style="font-size: 1.2em; font-family: cursive;">Stephanie Walker</p> | <p>7. Date of Delivery</p> <p style="font-size: 1.2em; font-family: cursive;">7-24-95</p> |
| <p>6. Signature (Agent)</p> | <p>8. Addressee's Address (Only if requested and fee is paid)</p> |

Thank you for using Return Receipt Service.

Z 392 979 058



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

| | |
|---|----|
| Sent to <i>Ms. Michelle Griffin</i> | |
| Street and No. <i>PO Box 1620</i> | |
| P.O., State and ZIP Code <i>Indian Town, Florida 34956</i> | |
| Postage | \$ |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt Showing to Whom & Date Delivered | |
| Return Receipt Showing to Whom, Date, and Addressee's Address | |
| TOTAL Postage & Fees | \$ |
| Postmark or Date <i>Sent 7/14/95</i> Received <i>PSDFL-168</i> | |