



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 16, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Stephen A. Sorrentino
Indiantown Cogeneration, L.P.
7475 Wisconsin Avenue
Bethesda, MD 20814-3422

Re: Martin County - A.P.
Indiantown Cogeneration, L.P.
PSD-FL-168; Permit Modification

Dear Mr. Sorrentino:

The Department has received a request from Mr. Douglas Roberts on May 28, 1992, for minor modifications to the recently issued permit for the above referenced project. The Department concurs with your request and will allow you to split the auxiliary boiler into two boilers, use propane fuel, and change the lead (Pb) standards.

The Department grants the following amendments to the above referenced permit:

Project Description, 3rd Paragraph, Page 1 of 13

FROM:

The proposed facility includes one main boiler and one steam generator, and an auxiliary boiler operated during lightoff and startup of the main boiler or if the main boiler is down and process steam is required for Caulkins Citrus Processing. The primary source of air emissions will be the main boiler, firing coal. Secondary air emission sources include the auxiliary boiler firing natural gas or No. 2 fuel oil, and the material handling systems. The operation of these units will result in significant net emissions increases of regulated air pollutants over the current emissions levels and thus, is subject to review by the Department under the prevention of significant deterioration (PSD) regulations (Rule 17-2.500, Florida Administration Code).

TO:

The proposed facility includes one main boiler and one steam generator, and **one or two 50% capacity** auxiliary boilers operated during lightoff and startup of the main boiler or if the main

Mr. Stephen A. Sorrentino
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Amendment to PSD-FL-168

boiler is down and process steam is required for Caulkins Citrus Processing. The primary source of air emissions will be the main boiler, firing coal. Secondary air emission sources include the auxiliary boilers firing natural gas, **propane** or No. 2 fuel oil, and the material handling systems. The operation of these units will result in significant net emissions increases of regulated air pollutants over the current emissions levels and thus, is subject to review by the Department under the prevention of significant deterioration (PSD) regulations (Rule 17-2.500, Florida Administration Code).

Specific Condition No. 2:

FROM: Only coal, natural gas or No. 2 fuel oil shall be fired in the pulverized coal (PC) boiler and auxiliary boiler.

TO: Only coal, natural gas, **propane** or No. 2 fuel oil shall be fired in the pulverized coal (PC) boiler and auxiliary boilers.

Specific Condition No. 3:

FROM: The maximum heat input to the PC boiler shall not exceed 3422 MMBtu/hr while firing coal. The auxiliary boiler shall not exceed 342 MMBtu/hr while firing No. 2 fuel oil and 358 MMBtu/hr firing natural gas or propane.

TO: The maximum heat input to the PC boiler shall not exceed 3422 MMBtu/hr while firing coal. The **one or two** auxiliary boilers shall not exceed a **combined total** of 342 MMBtu/hr while firing No. 2 fuel oil and a **combined total** of 358 MMBtu/hr firing natural gas or propane.

Specific Condition No. 4:

FROM: The PC boiler shall be allowed to operate continuously (8760 hrs/yr). The auxiliary boiler shall operate a maximum of 5000 hrs with up to 1000 hrs/yr on No. 2 fuel oil with 0.05% sulfur, by weight, and the balance on natural gas or propane. Fuel consumption must be continuously measured and recorded by fuel type (coal, natural gas or No. 2 fuel oil) for both the PC boiler and auxiliary boiler.

TO: The PC boiler shall be allowed to operate continuously (8760 hrs/yr). The auxiliary boiler or **boilers** shall operate a maximum of 5000 hrs **at the combined total heat input rates** with up to 1000 hrs/yr on No. 2 fuel oil with 0.05% sulfur, by weight, and the balance on natural gas or propane. Fuel consumption must be

continuously measured and recorded by fuel type (coal, natural gas, propane or No. 2 fuel oil) for both the PC boiler and auxiliary boilers.

Specific Condition No. 5:

FROM: Based on a permitted heat input of 3422 MMBtu/hr, the stack emissions from the main boiler shall not exceed any of the following limitations:

Pollutant	Basis lb/MMBtu	Emission Limitation	
		lb/hr	TPY
SO ₂	0.170*	582*	2549
NOx	0.170*	582*	2549
PM	0.018	61.6	270
PM ₁₀	0.018	61.6	270
CO	0.110	376*	1649
VOC	0.0036	12.32	54.0
H ₂ SO ₄	0.0004	1.45	6.51
Beryllium	0.0000027	0.0094	0.041
Mercury	0.0000114	0.039	0.17
Lead	0.00001	0.034	0.15
Fluorides	0.0015	5.08	22.3
Arsenic	0.000051	0.18	0.77

*24 hour daily block average (midnight to midnight)

TO: Based on a permitted heat input of 3422 MMBtu/hr, the stack emissions from the main boiler shall not exceed any of the following limitations:

Pollutant	Basis lb/MMBtu	Emission Limitation	
		lb/hr	TPY
SO ₂	0.170*	582*	2549
NOx	0.170*	582*	2549

PM	0.018	61.6	270
PM ₁₀	0.018	61.6	270
CO	0.110	376*	1649
VOC	0.0036	12.32	54.0
H ₂ SO ₄	0.0004	1.45	6.51
Beryllium	0.0000027	0.0094	0.041
Mercury	0.0000114	0.039	0.17
Lead	0.0000187	0.064	0.280
Fluorides	0.0015	5.08	22.3
Arsenic	0.000051	0.18	0.77

*24 hour daily block average (midnight to midnight)

Specific Condition No. 9

FROM: The auxiliary boiler, rated at up to 358 MMBtu/hr (Natural Gas and propane) and 342 MMBtu/hr (No. 2 fuel oil), shall be limited to a maximum of 5000 hours/year with up to 1000 hrs/yr firing No. 2 fuel oil with 0.05% sulfur, by weight, and the balance firing natural gas or propane. The maximum annual emissions will be as follows when firing No. 2 fuel oil for 1000 hrs/yr:

EMISSION LIMITATION

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/year</u>
NO _x	68.0	34
SO ₂	18.0	9
PM	1.4	0.70
PM ₁₀	1.4	0.70
CO	48.0	24
VOC	0.620	0.31
Be	4.0 x 10 ⁻⁵	2.0 x 10 ⁻⁵
Hg	5.2 x 10 ⁻⁴	2.6 x 10 ⁻⁴
Pb	3.6 x 10 ⁻²	1.8 x 10 ⁻²
As	6.8 x 10 ⁻³	3.4 x 10 ⁻³

TO: The auxiliary boiler or auxiliary boilers rated at a combined total of up to 358 MMBtu/hr (Natural gas and propane) and 342

MMBtu/hr (No. 2 fuel oil), shall be limited to a maximum of 5000 hours/year at the combined total heat input rates with up to 1000 hrs/yr firing No. 2 fuel oil with 0.05% sulfur, by weight, and the balance firing natural gas or propane. The maximum total annual emissions from the auxiliary boiler or boilers will be as follows when firing No. 2 fuel oil for 1000 hrs/yr:

EMISSION LIMITATION

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/year</u>
NO _x	68.0	34
SO ₂	18.0	9
PM	1.4	0.70
PM ₁₀	1.4	0.70
CO	48.0	24
VOC	0.620	0.31
Be	4.0 x 10 ⁻⁵	2.0 x 10 ⁻⁵
Hg	5.2 x 10 ⁻⁴	2.6 x 10 ⁻⁴
Pb	3.6 x 10 ⁻²	1.8 x 10 ⁻²
As	6.8 x 10 ⁻³	3.4 x 10 ⁻³

All other conditions remain as issued. This letter must be attached to the PSD-FL-168 permit and shall become a part of the permit.

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. 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 permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner 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, Florida Statutes.

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 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 intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 intent 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, F.A.C.

Sincerely,


Carol M. Brown
Secretary

CMB/MB/plm

cc: Jewell A. Harper, EPA
Isidore Goldman, SED
James W. Coleman, Jr., NPS
Steve Jelinek, ENSR

P 710 058 514



Certified Mail Receipt

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

Sent to	
Stephen Sorrentino	
Street & No.	
Indian Town Cogen	
PO, State & ZIP Code	
Bethesda, MD	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	7-21-92
PSD-FI-168	

PS Form 3800, June 1990

SENDER:

- 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 next to the article number.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Stephen A. Sorrentino
 Indian Town Cogen, L.P.
 7475 Wisconsin Ave
 Bethesda, MD 20814-3422

Article Number: 710 058 514

4. Service Type

<input checked="" type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input checked="" type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery: 7-27-92

5. Signature (Addressee)

6. Signature (Agent)

PS Form 3811, October 1990

*U.S. GPO: 1990-273-001

DOMESTIC RETURN RECEIPT



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol Browner
FROM: Howard L. Rhodes *HLR*
DATE: July 15, 1992
SUBJ: Amendments to Construction Permit PSD-FL-168
Indiantown Cogeneration, L.P.

Attached for your approval and signature is a letter amending the project description and Specific Conditions Nos. 2, 3, 4, 5, and 9 for the above referenced construction permit.

The amendments pertain to the following issues: a) Originally one auxiliary boiler was permitted. The applicant now requests to install two 50% capacity auxiliary boilers without exceeding the original heat input rates or fuel useages; b) The applicant requests to fire propane (which is a clean fuel) along with permitted fuels natural gas and No. 2 fuel oil; c) Lead emissions- The final order of power plant siting certificate contains lead emissions of 0.000187 lbs/MBtu; 0.064 lbs/hr; and 0.280 tons/yr. When the PSD permit was issued the lead emission standard was erroneously truncated to 0.00001 lbs/MBtu; 0.034 lbs/hr; and 0.15 tons/yr. This amendment will reinstate the correct lead emission standards.

The Bureau of Air Regulation recommends approval of this amendment.

HR/MB/plm

Attachment