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PLEASE REPLY TO :

August 31, 1993

Tallahassee

HAND DELIVERY

Virginia Wetherell  
Secretary  
Department of Environmental  
Protection  
2600 Blair Stone Road  
Twin Towers Office Building  
Tallahassee, Florida 32399

Re: Okeelanta Power Limited Partnership  
(DER File No. AC50-219413;  
PSD-FL-196; OGC Case No. 93-2300)

Dear Mrs. Wetherell:

This law firm has been representing Okeelanta Power Limited Partnership (OPLP) in its efforts to obtain the environmental permits for its proposed cogeneration facility, which will be located adjacent to the existing Okeelanta Corporation sugar mill near South Bay, in Palm Beach County, Florida. On behalf of OPLP, we respectfully request a 30 day extension of time to file a petition for a formal administrative hearing, if necessary, to challenge the Department's proposed agency action concerning the above-referenced permit.

On June 3, 1993 the Department issued and we received the Department's Intent to Issue a construction permit (AC50-219413; PSD-FL-196), Technical Evaluation and Preliminary Determination, draft permit, BACT Determination, and RACT Determination for the OPLP project. These documents contained findings and requirements that OPLP believed were inappropriate. OPLP promptly met with the Department to discuss its concerns and most of these issues have been resolved satisfactorily. OPLP would like to have additional time to work with the Department because it believes all of the remaining issues can be resolved in the near future.

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SEP 1 1993

Division of Air  
Resources Management

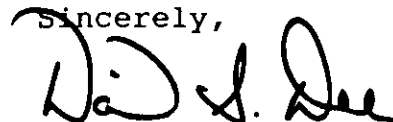
Ms. Virginia Wetherell  
Page Two  
August 31, 1993

On July 9, 1993, the Department granted OPLP's request for an extension of time for filing a petition for an administrative hearing. The Department's order extended OPLP's deadline until August 31, 1993. OPLP now requests that the deadline be extended until September 30, 1993.

We discussed these issues with the Department's attorney for this case, Ms. Claire Lardner, and she advised us that she has no objection to our request for an extension of time. We are not aware of any third-party petitioners or other people who would object to our request.

In light of the facts set forth above, we respectfully ask the Department to grant an extension of time up to and including September 30, 1993, pursuant to DER Rule 17-103.070, Florida Administrative Code, for OPLP to file a petition for a formal administrative hearing under Section 120.57(1), Florida Statutes.

Thank you for your cooperation and assistance with this matter. Please call us if you have any questions.

Sincerely,  
  
David S. Dee

cc: Gus Cepero  
David Buff  
Claire Lardner  
Howard Rhodes  
Clair Fancy  
Don Schaberg  
Mark Carney



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Division of Air  
Resources Management

August 11, 1993

Mr. Clair Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Okeelanta Power Limited Partnership  
AC50-219413, PSD-FL-196

Dear Mr. Fancy:

In follow up to our meeting with Okeelanta Power on July 2, 1993, this correspondence presents additional comments on the permit documents issued June 3 for the above referenced facility. It is hoped this submittal resolves the few outstanding concerns over the draft permit, and the final permit can be issued in an expeditious manner.

1. Specific Condition 1

Based upon recent discussions with the Department, the following wording is suggested for Specific Condition 1:

"Construction of the proposed cogeneration facility shall reasonably conform to the plans described in the application. The facility shall be designed and constructed so that its generating capacity shall not exceed 74.9 MW.

The permittee shall provide detailed engineering plans, 30 days after they become available, demonstrating that the steam electric generating system will not produce more than 74.9 MW at design maximum steam pressure. Such demonstration may include. . . . "

2. Specific Condition 11

The following wording is suggested for Specific Condition 11:

Page 7, paragraph 11. "The proposed cogeneration facility steam generating units shall be constructed and operated in accordance with the capabilities and specifications described in the application. The facility's hourly average electric generation rate shall not exceed 74.9 MW (gross), except during compliance and performance testing, which shall not exceed four hours in duration. The hourly average generation rate shall be recorded in a log and the log retained for at least 2 years. The maximum heat

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input rate for each steam generator . . . ." [In the alternative, the "facility's electric generation rate shall not exceed 74.9 MW on an hourly average basis, except during compliance and performance testing."]

**3. Operation of Cogeneration Boilers in Conjunction With Existing Okeelanta Boilers (Specific Condition 17)**

As described in the "Addendum For Okeelanta Power Limited Partnership" contained in the July 2 submittal to the Department, during initial startup of the cogeneration facility prior to commercial operation, it is possible the cogeneration boilers may be operated when the Okeelanta sugar mill boilers are also operating. This situation may arise when performance tests and debugging activities are conducted at the cogeneration facility.

It is expected that such operations will occur no more than 90 calendar days during the initial 12 months following cogeneration plant startup. This will not be a consecutive 90 day period, but will instead consist of intermittent periods of performance testing and debugging until commercial operation begins. During these 90 days, only biomass or No. 2 fuel oil will be burned in the cogen boilers. Coal will not be burned during this period.

Simultaneous operation of the existing and new facilities will only occur during the crop season, because the existing Okeelanta sugar mill boilers do not operate during the seven-month off-season (except for the No. 2 oil-fired package boiler, Boiler No. 16).

The testing of the cogeneration boilers prior to commercial operation may be performed in isolation (i.e., no steam being sent to the sugar mill) or in the cogeneration mode (i.e., with steam being sent to the sugar mill). When operating in isolation, the maximum steam load that will be potentially generated within the cogeneration facility is 910,836 lb/hr, which is the equivalent of two cogeneration boilers operating at full load (i.e., each boiler is capable of producing up to 455,418 lb/hr steam).

In order to investigate the potential air quality impacts of this situation, air dispersion modeling of the cogen boilers for biomass burning conditions was performed (i.e., emissions and gas flow rate are different than under coal burning conditions). Emissions equivalent to two cogen boilers at full load were modeled (refer to Table 1 attached). The results of this analysis are presented in Table 2. Impacts of No. 2 fuel oil were not investigated because maximum biomass emissions are greater than maximum No. 2 fuel oil emissions. As shown, the maximum cogen facility impacts for 910,836 lb/hr steam are all well below the air quality significant impact levels. This demonstrates that the cogen facility, when operated at or below this steam rate, will not contribute significantly to any existing air quality impacts (e.g., those due to the existing sugar mill boilers).

Class I PSD impacts were also analyzed for this potential case of simultaneous operation during the crop season. Presented in Table 3 are the predicted Class I impacts of the cogeneration boilers only at 910,836 lb/hr steam and burning biomass. As shown, all impacts except the SO<sub>2</sub> 24-hour and 3-hour



impact are below the National Park Service significance levels. Therefore, simultaneous cogen operation during the crop season will not cause or contribute to any Class I increment violations for PM or NO<sub>x</sub>.

In the original Class I SO<sub>2</sub> modeling presented in the application, the existing boilers were modeled as offsets during the crop season. For the case of simultaneous operation, the existing boilers would not be shut down, and therefore would not provide offsets (refer to Table 4 for estimated current emissions from existing boilers). However, the cogen boilers were originally modeled at 100 percent coal firing, whereas during simultaneous operation (during the 90 calendar day period), the cogen boilers will only burn biomass or No. 2 fuel oil (biomass represents worst-case emissions).

A comparison of the original basis of the SO<sub>2</sub> Class I modeling and the potential case of simultaneous operation, for both Okeelanta and Osceola, is presented in Table 5. As shown, for Okeelanta the PSD baseline SO<sub>2</sub> emissions are 1,060.1 lb/hr. Future SO<sub>2</sub> emissions in the original modeling were 1,764.0 lb/hr, whereas for simultaneous operation the SO<sub>2</sub> emissions will be 1,203.1 lb/hr. Thus, SO<sub>2</sub> emissions are reduced by 561 lb/hr compared to the original modeling and therefore PSD Class I impacts should be reduced for this case.

The cogeneration facility may also be tested at times when the cogeneration plant is operated in the cogeneration mode. During this mode, steam will be sent from the cogen facility to the sugar mill, and the sugar mill boilers steam production will be reduced by an equal amount. Under these conditions, air emissions and air impacts due to the existing Okeelanta boilers will be reduced. For each lb of steam generated, emissions are higher from the existing boilers than from the cogen boilers. The calculation of maximum emissions from the existing boilers is presented in Table 4, and those for the cogen boilers are shown in Table 1. The comparison of emissions from the existing and cogen boilers is presented in Table 6. As shown, for each pollutant, the lb/MMBtu and lb/1,000 lb steam emission factor is much lower for the cogeneration boilers.

In addition, the cogeneration stacks (199 ft) are higher than the existing boiler stacks (75 ft) and the cogeneration boiler exhaust gases (350°F) are of greater temperature than the existing boilers exhaust gases (150°F), and therefore the cogen boilers provide much greater dispersion of emissions. This demonstrates that any operation of the cogen boilers which sends steam to the sugar mill will only reduce total emissions and impacts.

It is noted that the No. 2 oil-fired package boiler (Boiler No. 16) is permitted to operate during both the crop season and the off-season. During the crop season, Boiler No. 16 can only operate to replace No. 6 oil-fired steam production in one of the existing boilers. This reduces emissions compared to the normal operation of the sugar mill.

During the off-season, Boiler No. 16 operates to supply steam to the refinery. The cogen boilers could operate in isolation up to 910,836 lb/hr during this period, with Boiler No. 16 also operating to support the refinery. As described above, cogen facility impacts under this scenario are below air quality significant impact levels. However, the concern of Class I PSD impacts must be addressed. In the



original permit application for Okeelanta Power, Class I PSD impacts were analyzed for the case of all three cogen boilers operating year-around with 100 percent coal being fired. The modeling analysis demonstrated that the cogeneration boilers will not cause or contribute to any violation of the PSD Class I increments in the Everglades National Park. With Boiler No. 16 operating and the cogen boilers producing 910,836 lb/hr steam, total emissions of SO<sub>2</sub>, PM, and NO<sub>x</sub> are reduced compared to the case of all three cogen boilers operating at maximum coal-burning capacity (refer to Table 7). As a result, Class I air quality impacts should be reduced for this case compared to the modeling results presented in the application.

Suggested wording for Specific Condition No. 17 which addresses this issue is provided below:

During the period beginning with initial firing of the cogeneration boilers and ending three years after commercial operation of the cogeneration facility, the existing Boilers Nos. 4, 5, 6, 10, 11, 12, 14 and 15 (Permit Nos. AO50-169210, 190690, 175414, 190693, 175411, 169215, 189904, and 209094, respectively) may be retained for standby operation.

During the period from initial firing to commercial operation, all three cogeneration boilers can be operated simultaneously with the existing boilers. Only biomass and No. 2 fuel oil may be used in the cogeneration boilers during this period. If more than 910,836 lb/hr steam is generated in the cogeneration boilers, steam in excess of 910,836 lb/hr must be sent to the Okeelanta sugar mill, and the existing boiler's steam production reduced by an equivalent amount. This period shall not exceed a total duration of 12 months. During this 12-month period, simultaneous operation of the existing boilers and the cogeneration boilers shall not occur on more than 90 calendar days.

During the three year period beginning with commercial operation of the cogeneration facility, the existing boilers may be operated only when all three of the cogeneration boilers are shutdown.

During operation, the existing boilers must meet all requirements in the most recent construction and operation permits for the boilers. These boilers shall be shutdown and rendered incapable of operation within three (3) years of commercial operation of the cogeneration facility, but no later than January 1, 1999.

#### 4. Restrictions on Treated Wood

The DEP has requested information on the concentrations of arsenic, chromium, and copper which would exist in the wood waste stream if 3 percent treated wood were present, with chromate copper arsenate (CCA) used as the wood preservative. Presented in Table 8 are the calculations and the resulting concentrations. The calculations and assumptions are consistent with the information and emissions that have been presented in the permit application. As shown, a treated wood amount of 3% in the wood waste stream would result in the following average concentrations in the wood waste stream: 70.7 ppm for arsenic, 83.3 ppm for chromium, and 62.8 ppm for copper. As previously demonstrated,

Mr. Clair Fancy, P.E., Chief  
August 11, 1993  
Page 5



these levels in the wood waste would not result in violation of DEP's Acceptable Toxic Reference Concentrations. In the July 2, 1993, submittal to the Department, revised wording for Specific Condition No. 12 was presented. Okeelanta recommends that this wording be incorporated into the final construction permit.

Thank you for your consideration of these comments. If you have any questions concerning these comments, please call me at 904-331-9000.

Sincerely,

*David A. Buff*

David A. Buff, M.E., P.E.  
Principal Engineer

DB/ej

cc: Gus Cepero, Okeelanta Corporation  
David Dee, Carlton-Fields  
Jewell Harper, EPA  
John Bunyak, NPS  
Frank Garguilio, PBCHU  
Bevin Beaudet, PBCHU  
Mark Carney, USGenCo  
File (2)

*D. Knuckles, SF Dist.*  
*D. Goldman, SE Dist.*

**Table 1. Cogen Facility Emissions When Burning Biomass, Okeelanta Power**

Boiler	Design Steam Rate Per Boiler (lb/hr)	Design Heat Input Per Boiler (MM Btu/hr)	Biomass Emission Factor (lb/MMBtu)				Biomass Emissions								
							(lb/hr)				(lb/1000 lb steam)				
			SO2	NOx	PM	CO	SO2	NOx	PM	CO	SO2	NOx	PM	CO	
Maximum Load Case															
1	455,418	715	0.10	0.15	0.03	0.35	71.5	107.3	21.5	250.3	0.157	0.235	0.047	0.549	
2	455,418	715	0.10	0.15	0.03	0.35	71.5	107.3	21.5	250.3	0.157	0.235	0.047	0.549	
3	455,418	715	0.10	0.15	0.03	0.35	71.5	107.3	21.5	250.3	0.157	0.235	0.047	0.549	
<b>Total</b>	<b>1,366,254</b>	<b>2,145</b>					<b>214.5</b>	<b>321.8</b>	<b>64.4</b>	<b>750.8</b>					
910,836 lb/hr Steam Case															
1	455,418	715	0.10	0.15	0.03	0.35	71.5	107.3	21.5	250.3	0.157	0.235	0.047	0.549	
2	455,418	715	0.10	0.15	0.03	0.35	71.5	107.3	21.5	250.3	0.157	0.235	0.047	0.549	
3	0	0	0.10	0.15	0.03	0.35	0.0	0.0	0.0	0.0	--	--	--	--	
<b>Total</b>	<b>910,836</b>	<b>1,430</b>					<b>143.0</b>	<b>214.5</b>	<b>42.9</b>	<b>500.5</b>					

Note: All figures derived from permit application.

OKCOGSIM  
8/5/93



Table 2. Okeelanta Power Cogeneration Facility Maximum Impacts for 910,836 lb/hr Steam Case

Pollutant	SO2	NOx	CO	PM
<u>Emission Rate</u> <sup>1</sup>				
(lb/hr)	143.0	214.5	500.5	42.9
(g/s)	18.02	27.03	63.06	5.41
<u>Maximum Impacts and Significance Levels</u> <sup>2</sup>				
Annual Max Impact	0.33	0.49	--	0.10
Sig. Level	1.00	1.00	--	1.00
24-hour Max Impact	4.4	--	--	1.3
Sig. Level	5.0	--	--	5.0
8-hour Max Impact	--	--	25.7	--
Sig. Level	--	--	500	--
3-hour Max Impact	11.1	--	--	--
Sig. Level	25.0	--	--	--
1-hour Max Impact	--	--	73.4	--
Sig. Level	--	--	2,000	--

Notes:

<sup>1</sup> Burning biomass with emissions equivalent to 910,836 lb/hr steam.

<sup>2</sup> Maximum impacts are based on cogeneration facility operating only during sugar mill season, October 1 through April 30. Impacts are the maximum refined impacts predicted using 1982 – 1986 meteorological data from West Palm Beach.

Significance Levels are PSD Class II Significant Impact Levels.

Generic maximum impacts at 10 g/s:

Annual	0.18174
24-hour	2.44514
8-hour	4.0734
3-hour	6.1492
1-hour	11.6386

Table 3. Okeelanta Cogeneration Facility Maximum Impacts – Class I Impacts For 910,836 lb/hr Steam Case.

Pollutant	Emission Rate <sup>1</sup>		Maximum Impacts (ug/m <sup>3</sup> ) <sup>2</sup>			Nat'l Park Service Sig. Levels (ug/m <sup>3</sup> )		
	(lb/hr)	(g/s)	Annual	24-hour	3-hour	Annual	24-hour	3-hour
SO <sub>2</sub>	143.0	18.02	0.015	0.280	1.225	0.03	0.07	0.48
NO <sub>x</sub>	214.5	27.03	0.023	--	--	0.025	--	--
PM	42.9	5.41	0.005	0.084	--	0.1	0.33	--

Notes

<sup>1</sup> 2 Boilers burning biomass.

<sup>2</sup> Based on cogeneration facility operating only during sugar mill crop season, 10/1 – 4/30.  
 Impacts based on highest concentration predicted during 1982–86.

Generic Maximum Impacts at 10 g/s:

Annual	0.00857
24-hour	0.15518
3-hour	0.67994

Table 4. Existing Boiler Emissions, Okeelanta Sugar Mill

Boiler	Design Steam Rate (lb/hr)	Design Heat Input (MMBtu/hr)	Emissions												
			Fuel Oil		Bagasse		Emission Factor (lb/MMBtu)		Oil		Bagasse+		Total (lb/hr)	Total (lb/MMBtu)	Total (lb/1000 lb steam)
			gal/hr	MMBtu/hr	MMBtu/hr	lb/hr(dry)	Fuel Oil	Bagasse	(lb/hr)	(lb/hr)					
WORST CASE 24-HOUR SO2 EMISSIONS															
4	90,000	182	164	24.6	157.4	19,674	2.73	0.125	67.2	19.7	86.9	0.477	0.97		
5	122,000	260	234	35.1	224.9	28,106	2.73	0.125	96.0	28.1	124.1	0.477	1.02		
6	125,000	260	234	35.1	224.9	28,106	2.73	0.125	96.0	28.1	124.1	0.477	0.99		
10	125,000	285	257	38.5	246.5	30,809	2.73	0.125	105.3	30.8	136.1	0.477	1.09		
11	125,000	279	251	37.7	241.3	30,160	2.73	0.125	103.1	30.2	133.2	0.477	1.07		
12	150,000	342	308	46.2	295.8	36,971	2.73	0.125	126.3	37.0	163.3	0.477	1.09		
14	150,000	333	300	45.0	288.0	35,998	2.73	0.125	123.0	36.0	159.0	0.477	1.06		
15	125,000	279	251	37.7	241.3	30,160	2.73	0.125	103.1	30.2	133.2	0.477	1.07		
Totals		2,220	2,000	300.1	1,919.9	239,985			820.0	240.0	1,060.0				
WORST CASE 24-HOUR NOx EMISSIONS															
4	90,000	182	164	24.6	157.4	19,674	0.446	0.235	11.0	37.0	48.0	0.264	0.53		
5	122,000	260	234	35.1	224.9	28,106	0.446	0.235	15.7	52.8	68.5	0.264	0.56		
6	125,000	260	234	35.1	224.9	28,106	0.446	0.235	15.7	52.8	68.5	0.264	0.55		
10	125,000	285	257	38.5	246.5	30,809	0.446	0.235	17.2	57.9	75.1	0.264	0.60		
11	125,000	279	251	37.7	241.3	30,160	0.446	0.235	16.8	56.7	73.5	0.264	0.59		
12	150,000	342	308	46.2	295.8	36,971	0.446	0.235	20.6	69.5	90.1	0.264	0.60		
14	150,000	333	300	45.0	288.0	35,998	0.446	0.235	20.1	67.7	87.8	0.264	0.59		
15	125,000	279	251	37.7	241.3	30,160	0.446	0.235	16.8	56.7	73.5	0.264	0.59		
Totals		2,220	2,000	300.1	1,919.9	239,985			134.0	451.2	585.2				
WORST CASE 24-HOUR PM EMISSIONS															
4	90,000	182	0	0.0	182.0	22,750	0.1	0.3	0.0	54.6	54.6	0.300	0.61		
5	122,000	260	0	0.0	260.0	32,500	0.1	0.3	0.0	78.0	78.0	0.300	0.64		
6	125,000	260	0	0.0	260.0	32,500	0.1	0.3	0.0	78.0	78.0	0.300	0.62		
10	125,000	285	0	0.0	285.0	35,625	0.1	0.2	0.0	57.0	57.0	0.200	0.46		
11	125,000	279	0	0.0	279.0	34,875	0.1	0.2	0.0	55.8	55.8	0.200	0.45		
12	150,000	342	0	0.0	342.0	42,750	0.1	0.2	0.0	68.4	68.4	0.200	0.46		
14	150,000	333	0	0.0	333.0	41,625	0.1	0.2	0.0	66.6	66.6	0.200	0.44		
15	125,000	279	0	0.0	279.0	34,875	0.1	0.2	0.0	55.8	55.8	0.200	0.45		
Totals		2,220	0	0.0	2,220.0	277,500			0.0	514.2	514.2				
WORST CASE 24-HOUR CO EMISSIONS															
4	90,000	182	0	0.0	182.0	22,750	0.033	3.625	0.0	659.8	659.8	3.625	7.33		
5	122,000	260	0	0.0	260.0	32,500	0.033	3.625	0.0	942.5	942.5	3.625	7.73		
6	125,000	260	0	0.0	260.0	32,500	0.033	3.625	0.0	942.5	942.5	3.625	7.54		
10	125,000	285	0	0.0	285.0	35,625	0.033	3.625	0.0	1,033.1	1,033.1	3.625	8.27		
11	125,000	279	0	0.0	279.0	34,875	0.033	3.625	0.0	1,011.4	1,011.4	3.625	8.09		
12	150,000	342	0	0.0	342.0	42,750	0.033	3.625	0.0	1,239.8	1,239.8	3.625	8.27		
14	150,000	333	0	0.0	333.0	41,625	0.033	3.625	0.0	1,207.1	1,207.1	3.625	8.05		
15	125,000	279	0	0.0	279.0	34,875	0.033	3.625	0.0	1,011.4	1,011.4	3.625	8.09		
Totals		2,220	0	0.0	2,220.0	277,500			0.0	8,047.5	8,047.5				

+ Assumes 50% SO2 removal when burning bagasse.

STIMUL  
8/02/93

Notes: No 6 Fuel Oil - 18.300 Btu/NOx = 67 lb/1000 gal  
 8.2 lb/gal CO = 5 lb/1000 gal  
 2.5 % sulfur PM = 0.1 lb/MMBtu

Bagasse - 8,000 Btu/lb (dry) NOx = 0.235 lb/MMBtu  
 0.1% sulfur, max (d) CO = 29 lb/ton (wet)  
 PM = 0.2 or 0.3 lb/MMBtu

Table 5. SO2 Emissions for Okeelanta and Osceola Used in PSD Class I Analysis

Source	Original Basis of Modeling		Simultaneous Operation of Existing/Cogen Boilers	
	Okeelanta (lb/hr)	Osceola (lb/hr)	Okeelanta (lb/hr)	Osceola (lb/hr)
	PSD Baseline		PSD Baseline	
Boiler 1	--	40.2	--	40.2
Boiler 2	--	129.5	--	129.5
Boiler 3	--	57.6	--	57.6
Boiler 4	86.9	108.0	86.9	108.0
Boiler 5	124.1	--	124.1	--
Boiler 6	124.1	--	124.1	--
Boiler 10	136.1	--	136.1	--
Boiler 11	133.3	--	133.3	--
Boiler 12	163.3	--	163.3	--
Boiler 14	159.0	--	159.0	--
Boiler 15	133.3	--	133.3	--
Boiler 16	--	--	--	--
Totals	1,060.1	335.3	1,060.1	335.3
	Future		Future	
Boiler 1	--	--	--	--
Boiler 2	--	--	--	77.9
Boiler 3	--	--	--	36.5
Boiler 4	--	--	86.9	77.9
Boiler 5	--	--	124.1	139.1
Boiler 6	--	--	124.1	235.7
Boiler 10	--	--	136.1	--
Boiler 11	--	--	133.3	--
Boiler 12	--	--	163.3	--
Boiler 14	--	--	159.0	--
Boiler 15	--	--	133.3	--
Boiler 16	--	--	--	--
Cogen Boilers	1,764.0 *	1,104.0 *	143.0 **	77.0 **
Totals	1,764.0	1,104.0	1,203.1	644.1

\* Cogen facility boilers operating on 100% coal.

\*\* Cogen boilers operating on biomass and limited steam production.

CLASS1CP  
8/04/93

Table 6. Comparison of Existing Boiler and Cogen Facility Emissions, Okeelanta

Pollutant	Existing Boilers*		Cogen Boilers (Biomass)	
	lb/MMBtu	lb/1000 lb steam	lb/MMBtu	lb/1000 lb steam
SO <sub>2</sub>	0.477	0.97	0.10	0.157
NO <sub>x</sub>	0.264	0.53	0.15	0.235
PM	0.20	0.44	0.03	0.047
CO	3.625	7.33	0.35	0.549

\* Lowest emission rate for any of the existing boilers.

EXCGCOMP  
7/28/93

Table 7. Comparison of Cogen Facility and Boiler No. 16 Emissions For PSD Class I Impact Analysis, Okeelanta Power

Boiler	Maximum Steam Rate (lb/hr)	Maximum Heat Input (MM Btu/hr)	Emission Factor (lb/MMBtu)			Emissions (lb/hr)		
			SO2	NOx	PM	SO2	NOx	PM
Off-Season Operation Prior to Commercial Operation								
Cogen Boilers- biomass*	910,836	1,430	0.10	0.15	0.03	143.0	214.5	42.9
Boiler No. 16**	150,000	205	0.51	0.18	0.05	105.5	36.9	11.1
Total	1,060,836	1,635				248.5	251.4	54.0
Basis of Permit Application								
Cogen Boilers- coal***	1,366,254	2,145	1.2	0.17	0.03	2,574.0	364.7	64.4

\* Maximum steam rate when Boiler No. 16 may also be operating. Cogen boilers burning biomass.

\*\* All figures derived from permit application.

\*\*\* Situation modeled for Class I impacts in permit application.

COGBLR16  
7/28/93

Table 8. Concentration of Metals in Wood Waste at Okeelanta Power

WOOD WASTE PARAMETERS	
-----	
Total Biomass	1,352,941 tons
Total Wood waste	33%
Total Wood waste	446,471 tons
CLEAN WOOD WASTE PARAMETERS	
-----	
Total Clean Wood Waste	97%
	433,076 tons
Arsenic content (1 ppm)	0.43 tons
Chromium content (3 ppm)	1.30 tons
Copper content (15 ppm)	6.50 tons
TREATED WOOD PARAMETERS	
-----	
Percent of total wood amount	3.0%
Total Treated Wood	13,394 tons
Treated wood density	26.3 lb/ft <sup>3</sup>
CCA in treated wood	0.47 lb/ft <sup>3</sup>
	0.01787 lb CCA/lb treated wood
Total CCA in treated wood	239.4 tons
Total CCA components in treated wood	
Arsenic (13%)	31.1 tons
Chromium (15%)	35.9 tons
Copper (9%)	21.5 tons
WOOD WASTE CONCENTRATIONS	
-----	
Total CCA components in wood waste	
Arsenic	31.6 tons
Chromium	37.2 tons
Copper	28.0 tons
Arsenic	70.7 ppm
Chromium	83.3 ppm
Copper	62.8 ppm

OKCCA  
7/27/93



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

JUL 30 1993

RECEIVED

AUG 08 1993

4APT-AEB

Mr. Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental  
Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Division of Air  
Resources Management

RE: Okeelanta Power Limited Partnership (PSD-FL-196)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility by letter dated June 3, 1993. The proposed project includes the construction of three stoker-fired boilers utilizing the combustion of bagasse, waste wood, coal, and fuel oil to generate steam for the Okeelanta sugar mill and electricity for sale to Florida Power and Light. The project also involves the shutdown of eight existing bagasse/No. 6 fuel oil-fired boilers. The project is subject to PSD review for the emissions of SO<sub>2</sub>, Be, and fluorides.

As discussed between Mr. Preston Lewis of your staff and Mr. Gregg Worley of my staff, we have reviewed the package as requested and have no adverse comments. If you have any questions or comments, please contact Mr. Gregg Worley of my staff at (404) 347-5014.

Sincerely yours,

Brian L. Beals, Chief  
Source Evaluation Unit  
Air Enforcement Branch  
Air, Pesticides and Toxics  
Management Division

- CC: M. Hanks
- C. Holladay
- D. Knowles, SF Dist.
- J. Goldman, SE Dist.
- G. Stamer, PBCHD
- G. Burch, NPS
- W. Buff, KBN





IN REPLY REFER TO:

N16 (SER-ODN)

# United States Department of the Interior

NATIONAL PARK SERVICE  
SOUTHEAST REGIONAL OFFICE

75 Spring Street, S.W.  
Atlanta, Georgia 30303

RECEIVED

JUL 21 1993

Division of Air  
Resources Management

JUL 15 1993

Mr. C. H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

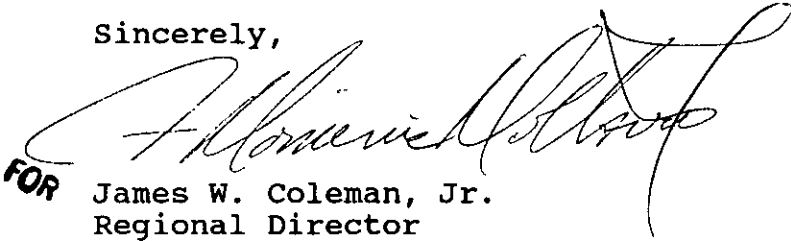
Dear Mr. Fancy:

We have completed our review of the permit application and your Technical Evaluation and Preliminary Determination regarding Okeelanta Power Limited Partnership's proposal to construct a cogeneration facility near South Bay, Florida. The Okeelanta facility is located approximately 94 km north of Everglades National Park, a Class I air quality area administered by the National Park Service.

The Okeelanta facility will generate approximately 71 megawatts of electricity and will use biomass as the primary fuel with fuel oil and low sulfur coal as alternate fuels. The three new boilers for the proposed cogeneration facility will replace eight existing oil-fired boilers at an adjacent sugar mill. The replacement of the eight boilers will result in net decreases in emissions of particulate matter, nitrogen oxides, carbon monoxide, and volatile organic compounds, but will result in significant net increases in sulfur dioxide, beryllium, and fluoride emissions. We agree that firing low sulfur fuels, limiting the amounts of oil and coal to be fired, and using an electrostatic precipitator are best available control technology for sulfur dioxide, beryllium, and fluorides. Based on the results of our review, we do not anticipate that the proposed project will have a significant impact on sensitive resources at Everglades National Park.

Thank you for providing us the opportunity to comment on Okeelanta's permit application. If we can be of further assistance, please contact Dee Morse of our Air Quality Division in Denver at (303) 969-2071.

Sincerely,



**FOR** James W. Coleman, Jr.  
Regional Director  
Southeast Region

cc: St. Hamps  
C. Holladay  
D. Knowles, S. Dist.  
J. Goldman, SE Dist.  
J. Harper, EPA  
J. Stormer, PBCHU  
J. Buff, KBN

CARLTON, FIELDS, WARD, EMMANUEL, SMITH & CUTLER, P. A.

ATTORNEYS AT LAW

ONE HARBOUR PLACE P.O. BOX 3239 TAMPA, FLORIDA 33601 (813) 223-7000 FAX (813) 229-4133	FIRST STATE TOWER P.O. BOX 1171 ORLANDO, FLORIDA 32802 (407) 849-0300 FAX (407) 648-9099	HARBOURVIEW BUILDING P.O. BOX 12426 PENSACOLA, FLORIDA 32582 (904) 434-0142 FAX (904) 434-5366	FIRST FLORIDA BANK BUILDING P.O. DRAWER 190 TALLAHASSEE, FLORIDA 32302 (904) 224-1585 FAX (904) 222-0398	ESPERANTE P.O. BOX 150 WEST PALM BEACH, FLORIDA 33402 (407) 659-7070 FAX (407) 659-7368	BARNETT TOWER P.O. BOX 2861 ST. PETERSBURG, FLORIDA 33731 (813) 821-7000 FAX (813) 822-3768
--	--	--	--	---	---

PLEASE REPLY TO :

June 16, 1993

Tallahassee

HAND DELIVERY

Virginia Wetherell  
Secretary  
Department of Environmental  
Protection  
2600 Blair Stone Road  
Twin Towers Office Building  
Tallahassee, Florida 32399

RECEIVED

JUN 17 1993

Division of Air  
Resources Management

Re: Okeelanta Power Limited Partnership  
(DER File No. AC50-219413; PSD-FL-196)

Dear Mrs. Wetherell:

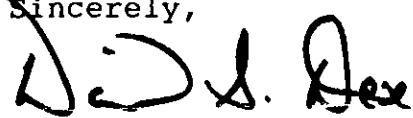
This law firm has been representing Okeelanta Power Limited Partnership (OPLP) in its efforts to obtain the environmental permits for its proposed cogeneration facility, which will be located adjacent to the existing Okeelanta Corporation sugar mill near South Bay, in Palm Beach County, Florida. On behalf of OPLP, we respectfully request a 75 day extension of time to file a petition for a formal administrative hearing, if necessary, to challenge the Department's proposed agency action concerning the above-referenced permit.

On June 3, 1993 the Department issued and we received the Department's Intent to Issue a construction permit (AC50-219413; PSD-FL-196), Technical Evaluation and Preliminary Determination, draft permit, BACT Determination, and RACT Determination for the OPLP project. These documents contain findings and requirements that OPLP believes are inappropriate. OPLP intends to meet with the Department promptly to discuss and informally resolve its concerns about these issues. OPLP would like to have additional time to work with the Department, rather than being compelled to file a petition for an administrative hearing and starting an adversarial process that may be unnecessary. We previously discussed these issues with the Department's attorney for this case, Ms. Clare Lardner, and she advised us that she has no objection to our request for an extension of time. We are not aware of any third-party petitioners or other people who would object to our request.

Mrs. Virginia Wetherell  
Page Two  
June 16, 1993

In light of the facts set forth above, we respectfully ask the Department to grant an extension of time up to and including August 31, 1993, pursuant to DER Rule 17-103.070, Florida Administrative Code, for OPLP to file a petition for a formal administrative hearing under Section 120.57(1), Florida Statutes.

Thank you for your cooperation and assistance with this matter. Please call us if you have any questions.

Sincerely,  
  
David S. Dee

cc: Gus Cepero  
David Buff  
Clare Lardner  
Howard Rhodes  
Clair Fancy  
Don Schaberg  
*M. Hambo*  
*C. Holladay*

OKEELANTA CORPORATION

6 MILES SOUTH OF SOUTH BAY  
POST OFFICE BOX 86  
SOUTH BAY, FLORIDA 33493

TELEPHONE (407) 996-9072

TELEX: 803444

RECEIVED

JUL 12 1993

Division of Air  
Resources Management

June 15, 1993

Mr. C. H. Fancy, P.E.  
Chief  
Department of Environmental Regulation  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Re: Okeelanta Power Limited Partnership  
Construction Permit (AC50-21943/PSD/FL-196)

Gentlemen:

Enclosed herewith you will find proof of publication of "Notice of Intent to Issue a Permit" duly signed and notarized, published in the Palm Beach Post, Legal Notices Section on June 9, 1993, regarding the matter of subject.

If you have any questions, please advise.

Yours sincerely,

*Gus Cepero*  
Gus Cepero  
Vice-President

/rn

cc: *A. Hanks*  
*C. Halladay*  
*D. Knudsen, CE Dept*  
*J. Sullivan, E. Dept*  
*J. Strickland, PR/HD*  
*M. W. P. EPA*  
*M. W. P. PS*

**PROOF OF PUBLICATION**

STATE OF FLORIDA  
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Chris Bull  
who on oath says that she/he is Class. Sales Mgr. of The Palm Beach Post,  
a daily and Sunday newspaper published at West Palm Beach in Palm Beach County,  
Florida; that the attached copy of advertising, being a Notice  
in the matter of intent to issue permit  
in the --- Court, was published in said newspaper in  
the issues of June 9, 1993

Affiant further says that the said The Post is a newspaper published at West Palm Beach,  
in said Palm Beach County, Florida, and that the said newspaper has heretofore been  
continuously published in said Palm Beach County, Florida, daily and Sunday and has been  
entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach  
County, Florida, for a period of one year next preceding the first publication of the attached  
copy of advertisement; and affiant further says that she/he has neither paid nor promised  
any person, firm or corporation any discount, rebate, commission or refund for the purpose  
of securing this advertisement for publication in the said newspaper.

*Chris Bull*

Sworn to and subscribed before me this 9 day of June A.D. 19 93

OFFICIAL NOTARY SEAL  
KAREN M. MCLINTON  
NOTARY PUBLIC STATE OF FLORIDA  
COMMISSION NO. CC240450  
MY COMMISSION EXP. NOV. 15, 1996

*Karen M. McLinton*  
Karen M. McLinton, Notary Public

Personally known XX or Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_

DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF INTENT TO ISSUE PERMIT  
The Department of Environmental Regulation gives notice of its intent to issue a construction permit (ACS0-218413/P80-PL-186) to Occoonta Power Limited Partnership, P.O. Box 96, South Bay, Florida 33483. The proposed permit is for a 71.25 MW of electricity cogeneration facility that will use biomass (bagasse and wood waste material) as the primary fuel with No. 2 fuel oil and low sulfur (0.7 percent) coal as alternate fuels. The proposed facility will be constructed at the Occoonta Corporation sugar mill located 8 miles south of South Bay, off U.S. Highway 27, Palm Beach County, Florida. The three new 715 MMBtu/hr boilers for the proposed cogeneration facility, each using an electrostatic precipitator, a selective non-catalytic reduction system, and a carbon injection system to control air pollution, will replace 8 existing bagasse/No. 8 fuel oil fired boilers at the sugar mill. Each new boiler will emit up to 21.5 lbs/hr particulate matter; 688.0 lbs/hr sulfur dioxide, 17.6 lbs/hr sulfur acid mist, 107.3 lbs/hr nitrogen oxide, 250.3 lbs/hr carbon monoxide, 11.8 lbs/hr fluorides, 0.003 lbs/hr beryllium, 42.9 lbs/hr volatile organic compounds, and trace amounts of other criteria/non-criteria pollutants. The project (3 new cogeneration boilers replacing 8 existing bagasse/No. 8 oil fired boilers) will decrease net emissions of particulate matter (-290.4 TPY), nitrogen oxides (-26.2 TPY), carbon monoxide (-8,375.5 TPY), and volatile organic compounds (-55.9 TPY); but increase net emissions of sulfur dioxide (406.0 TPY), beryllium (+0.0048 TPY), fluorides (+21.2 TPY), and sulfuric acid mist (+8.4 TPY). The proposed increase in emissions of sulfur dioxide, beryllium, and fluorides are greater than the significant emission rates. Therefore, the project is subject to review under the Prevention of Significant Deterioration (PSD) regulations and the emission limits for these pollutants are established by a Best Available Control Technology (BACT) determination. The maximum predicted PSD Class II sulfur dioxide increments consumed after this project is constructed are the following: 8.7 ug/m3, annual average, or 44% of the available annual increment of 20 ug/m3; 85 ug/m3, 24-hour average; 156 ug/m3, 3-hour average; or 30% of the available 3-hour increment of 512 ug/m3. The maximum predicted PSD Class I sulfur dioxide increments consumed are the following: 0.67 ug/m3, annual average or 34% of the available annual increment of 2.0 ug/m3; 4.82 ug/m3, 24-hour average; or 36% of the available 24-hour increment of 5.0 ug/m3; and 22.8 ug/m3, 3-hour average; or 91% of the available 3-hour increment of 25 ug/m3. The Department is issuing this notice to give for the reasons stated in the Technical Evaluation and Preliminary Determination. 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 petitioner must state the information set forth below and send the same (received) to the Office of General Counsel of the Department at 2000 Star Street Road, Tallahassee, Florida 32309-8400, within 14 days of publication of this notice. 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.

at 2600 Star Stone Road, Tallahassee, Florida 32309-8400, within 14 days of publication of this notice. 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 the Notice. Persons whose substantial interests will be affected by any decision of the Department with respect to the application have the right to petition by being a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice 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 28-6.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of  
Environmental Regulation  
Bureau of Air Regulation  
111 S. Magnolia Dr., Suite 4  
Tallahassee, FL 32301

Department of  
Environmental Regulation  
South District  
2295 Victoria Ave., Suite 364  
FL Myers, FL 33901

Department of  
Environmental Regulation  
Southeast District  
1900 S. Congress Ave.,  
Suite A

West Palm Beach, FL 33406  
Palm Beach County  
Health Dept.  
Division of Environmental  
Science and Engineering  
901 E. Evernia Street

West Palm Beach, FL 33406  
Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

PUB: The Palm Beach Post  
June 9, 1993