

3/15 Bruce
thanks
Clay

I N T E R O F F I C E M E M O R A N D U M

Date: 10-Mar-1994 12:15pm ES
From: Bruce Mitchell TAL
MITCHELL_B
Dept: Air Resources Manageme
Tel No: 904/488-1344
SUNCOM:

TO: Hamilton Buck Oven TAL (OVEN_H)
CC: Clair Fancy TAL (FANCY_C)
Subject: RE: Cedar Bay & TECO Big Bend

March 10, 1994

Buck,

I discussed the request with Clair Fancy and John Brown. Cedar Bay Cogeneration's request is acceptable and the Bureau has no objection to granting the extension of the expiration date for the alternative ash disposal system.

Bruce Mitchell
488-1344

cc: John Brown

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Date: 10-Mar-1994 12:22pm ES
From: Bruce Mitchell TAL
MITCHELL_B
Dept: Air Resources Manageme
Tel No: 904/488-1344
SUNCOM:

TO: John Brown TAL

(BROWN_J)

Subject: Response to Buck Oven on Cedar Bay Cogen. Req. (Exp. Date Ext

I N T E R O F F I C E M E M O R A N D U M

Date: 09-Mar-1994 11:23am EST
From: Hamilton Buck Oven TAL
OVEN H
Dept: Office of Secretary
Tel No: 904/487-0472
SUNCOM: Room 953-A

TO: Bruce Mitchell TAL
TO: Clair Fancy TAL

(MITCHELL B)
(FANCY_C)

Subject: Cedar Bay & TECO Big Bend

Have you had a chance to review Cedar Bay's request to get a 45 day extension of the alternative ash disposal procedure? Richard Robinson from RESD called to say they had no objections to the extension and would send out an observer to verify opacity.

Please send me your response to Greg Nelson's objection to 5% opacity at Big Bend for the coal handling. The original conditions specified 20%. Do we have new regulations in effect that require compliance with 5%?

**Cedar Bay Generating Company
Limited Partnership**

RECEIVED

March 7, 1994

VIA FACSIMILE

MAR 8 1994

Bureau of
Air Regulation

Mr. Hamilton S. Oven, P.E.
Administrator
Siting Coordination Office
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

File #: 66.37.1

RE: Extension of Alternative Ash Disposal Procedure for the Cedar Bay Cogeneration
Project - Site Certification Number PA 88-24A

Dear Mr. Oven:

The Cedar Bay Generating Company, L. P. ("CBGC") requests a 45 day extension to the alternative ash disposal procedure's current expiration date of March 10, 1994. As you may recall, this procedure involves notifying the Jacksonville Regulatory and Environmental Services Division ("RESD") of ash loading commencement, loading ash into open rail cars, sealing the ash with water and a crusting agent, and sending the rail cars to a permitted ash disposal facility in West Virginia. Visible emissions testing conducted during initial ash loading and witnessed by a representative of RESD confirmed that ash removal according to the procedure is consistent with the low emissions ash removal techniques mentioned in the Conditions of Certification.

CBGC continues to correct malfunctioning components of the ash pelletizing system. Since our previous correspondence CBGC has modified the fly ash feed system's control parameters, modified the fly and bed ash systems' transport blowers, replaced the bed ash feed system's base plates, modified the bed ash feed system's rotors and hydrator discharge doors, replaced one of the pelletizing pan system's scraper plates, replaced the pellet handling system's variable speed distributor, aligned the pellet handling system's conveyor belts, modified the pellet loadout system's screens, redesigned the recycle system's pellet recycle conveyor recycle drag chutework, and replaced of the recycle system's recycle elevator buckets. Through this effort, CBGC has been able to produce and transport approximately 70 railcars of ash pellets.

Despite the success in correcting the components mentioned above, other malfunctioning components are not yet corrected. These components were identified during CBGC's complete system check, and their resolution should be achieved through addition of insulation around baghouses, replacement of pellet screens, addition of a clinker grinder, installation of silo liners,



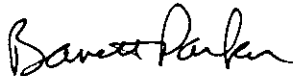
March 7, 1994

Page 2

and addition of a pellet recycle system. While these components are being corrected, unpelletized ash may be produced. Because the ash pelletizing system is designed to operate continuously on pre-determined ratios of bed and fly ash and since CBGC desires to maximize the operation of the ash pelletizing system, any unpelletized ash produced affects the overall material balance and needs to be removed promptly.

CBGC would like to meet in Tallahassee with you or members of your staff to further discuss both the corrections made and the corrections yet to be made on the ash pelletizing system. Should you desire, the meeting could be held on-site after a tour of the ash pelletizing system. I will contact your office regarding scheduling this meeting. In the interim, should you or your staff have questions concerning this extension request or the meeting, please contact me at (301) 718-6937.

Sincerely,



Barrett Parker
Environmental Specialist

cc: J.F. Stallwood, CBGC
C.M. Staley, USGC
K. Fickett, USGC
G. Weidinger, USGC
J.G. Kelly, USGC
Ernie Frey, DEP/NED
Alton W. Yates, RESD
Clair Fancy, DEP/BAR

U.S. Generating Company
*Cedar Bay Cogeneration Project***RECEIVED****Fax Message**

| | | | |
|--|------------------------|----------------|----------------------------------|
| DATE: | <u>3/7/94</u> | MAR 7 1994 | |
| TO: | <u>Mr. Clair Foney</u> | FACSIMILE NO.: | Bureau of Air Regulation |
| COMPANY: | <u>FL DEP / BAR</u> | NO. OF PAGES: | <u>3</u> (including this one) |
| CITY/STATE: | <u>Tallahassee, FL</u> | | |
| FROM: | <u>Barrett Parker</u> | PHONE NO.: | <u>904-751-1007</u> |
| SPECIAL INSTRUCTIONS: | <u>please deliver</u> | | |
| If transmittal is incomplete or illegible, please call Vonda Sexton/Amy Nolan at (904) 751-1007. | | | |

Message: Request to extend alternative ash disposal procedure attached;
hard copy to follow.

**Cedar Bay Generating Company
Limited Partnership**

March 7, 1994

VIA FACSIMILE

Mr. Hamilton S. Oven, P.E.
Administrator
Siting Coordination Office
Florida Department of Environmental Protection
2600 Blair Stone Road
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March 7, 1994

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J.G. Kelly, USGC
Ernie Frey, DEP/NED
Alton W. Yates, RESD
Clair Fancy, DEP/BAR

October - December 93
Construction Status

1. Coal Unloading , Crushing and Storage

Coal handling system is in operation. Full long term stockpile is in storage on site and weekly off loading of coal trains is continuing. Bi-weekly deliveries of coal will begin in January 94. Construction of the on-site railroad and the coal storage area liner is complete. Conveying to the coal crusher and power plant silos commenced in November 93.

2. Limestone Pulverizing and Storage

Limestone handling system is in operation. Limestone storage area is at capacity. Conveying through the crushers and dryers is on-going and injection into the boilers commenced in November 93.

3. Ash Handling, Pelletizing and Storage

Ash handling system is in operation. Fly ash and bed ash have been loaded into the storage silos. Trial operation of the pelletizing system commenced in December 93. Full system operation is targeted for January 94.

4. Boilers

Bed material was placed in all three boilers and each fired on coal in November. Operation and checkout of the units continued at varying power levels through November and December. Construction of the thermal denox system is complete and the system is now in operation. Performance testing is targeted to commence in January 94.

5. Baghouses & Stack

Each of the fabric filter units (baghouses) have been seeded and were placed in operation in November. Fabric filter controls and fly ash removal system is in operation.

6. Turbine Generator

Turbine roll occurred on November 1 and initial synchronization on November 3. Final heat balance testing was completed in early December. Operation at varying power levels occurred in November and December.

7. Waste Water Treatment Facility

Construction is complete on the Waste Water Treatment Facility. The Evaporators have been placed into service and the crystallizer is forecast to go into operation in January 94. The pretreatment clarifiers continue to be operated to support the main power plant.

8. Fiber Waste Handling System

Construction of the fiber waste handling system is complete. Final mechanical and electrical checkout is underway. Operation of the system is targeted for the first quarter of 94.



Lawton Chiles
Governor

Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

RECEIVED

January 21, 1994

JAN 25 1994

Mr. Barrett Parker
U.S. Generating Company
7500 Old Georgetown Road
Bethesda, Maryland 20814-1616

Bureau of
Air Regulation

Re: Cedar Bay Cogeneration Project, PA 88-24

Dear Mr. Parker:

The Department of Environmental Protection has reviewed the request for extension of the alternative flyash disposal procedure for the Cedar Bay Cogeneration facility as outlined in your letter of January 19, 1994. The alternate flyash disposal procedure may be used for a period not to exceed 45 days from January 24, 1994, otherwise until March 10, 1994. Please have Mr. Stallwood or other plant person to inform the Jacksonville Regulatory and Environmental Services Division when flyash loading and shipment is to take place.

Sincerely,

Hamilton S. Owen
Hamilton S. Owen, P.E.
Administrator, Siting
Coordination Office

cc: Ernie Frey, DEP/NED
Alton W. Yates, RESD
Clair Fancy, DEP/BAR

**Cedar Bay Generating Company
Limited Partnership**

January 19, 1994

RECEIVED

VIA FACSIMILE

JAN 24 1994

Mr. Hamilton S. Oven
Florida Department of Environmental Protection
Office of Siting Coordinator
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Bureau of
Air Regulation

File #: 66.37.1

**RE: Extension of Alternative Ash Disposal Procedure for the Cedar Bay
Cogeneration Project - Site Certification Number PA 88-24A**

Dear Mr. Oven:

The Cedar Bay Cogeneration Project ("CBCP") requests a 45 day extension to the alternative ash disposal procedure's current expiration date of January 24, 1994. As you may recall, this procedure involves notifying the Jacksonville Regulatory and Environmental Services Division ("RESD") of ash loading commencement, loading ash into open rail cars, sealing the ash with water and a crusting agent, and sending the rail cars to a permitted ash disposal facility in West Virginia. Visible emissions testing conducted during initial ash loading and witnessed by a representative of RESD confirmed that ash removal according to the procedure is consistent with the low emissions ash removal techniques mentioned in the Conditions of Certification.

The procedure was developed in response to a startup malfunction of the pelletizing pans, one component of the ash pelletizing system. Adjustments made to the pelletizing pans by Transbulk, the ash pelletizer manufacturer, appear to have corrected the malfunction; however, an entire system check has not yet been completed. This check is underway and should be completed by the end of February. CBCP will not accept the system until each component (and the entire system) operates as guaranteed. In the interim period, continuous emissions monitor performance tests are underway and air emissions tests are scheduled to begin next week. In order to conduct these tests, the boilers must be operating and producing ash. So that the testing schedule not be impacted, CBCP needs to be able to remove all ash created during testing, irrespective of unchecked ash pelletizer system component malfunctions.



Mr. Hamilton S. Owen
January 19, 1994
Page 2

Should you or your staff have questions concerning this request, please contact me at
(904) 751-1007.

Sincerely,

A handwritten signature in black ink, appearing to read "Barrett Parker", with a long horizontal flourish extending to the right.

Barrett Parker
Environmental Specialist

cc: J.F. Stallwood, CBGC
C.M. Staley, USGC
J.G. Kelly, USGC
E. Frey, FDEP
A. Yates, RESD
C. Fancy, FDEP

Bruce

**Cedar Bay Generating Company
Limited Partnership**

RECEIVED

January 11, 1993

JAN 18 1994

Bureau of
Air Regulation

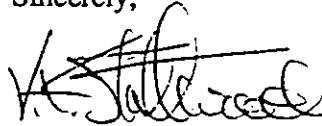
Via Federal Express

Mr. Hamilton Oven, Administrator
Site Coordination Office
Florida Department of Environmental Protection
Marjory Stoneman Douglas Building
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Mr. Oven:

Enclosed for your review, is a copy of the Cedar Bay Cogeneration Plant "Integrated (SNCR) Unit Operation Manual" prepared by our Contractor, Black & Veatch. This manual contains additional information which should enable you to evaluate the system more extensively. However, should you need further information, please do not hesitate to call me directly at (904) 751-1007.

Sincerely,



J. Franklin Stallwood
Project Manager

JFS/vs

Enclosure

cc: Barrett Parker, USGen w/o enclosure
✓Clare Fancy, FDEP w/o enclosure

