

**RECEIVED**  
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BUREAU OF AIR REGULATION

**APPLICATION FOR  
AIR CONSTRUCTION PERMIT  
CEDAR BAY COGENERATION FACILITY  
CEDAR BAY, FLORIDA**

**Prepared For:**  
Cedar Bay Generating Company  
9640 Eastport Road  
Cedar Bay, Florida 32218-2260

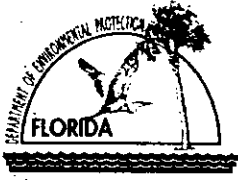
**Prepared By:**  
Golder Associates Inc.  
6241 NW 23rd Street, Suite 500  
Gainesville, Florida 32653-1500

**June 2006**

**0637514**

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4 Copies – FDEP  
2 Copies – Cedar Bay Generating Company  
1 Copy – Golder Associates Inc.

**APPLICATION FOR AIR PERMIT – LONG FORM**



# Department of Environmental Protection

## Division of Air Resource Management

### APPLICATION FOR AIR PERMIT - LONG FORM

#### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

**Air Operation Permit** – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option)** – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>Cedar Bay Generating Company, L.P.</b>	
2. Site Name: <b>Cedar Bay Cogeneration Facility</b>	
3. Facility Identification Number: <b>0310337</b>	
4. Facility Location...: <b>Cedar Bay Cogeneration Facility</b> Street Address or Other Locator: <b>9640 Eastport Road</b> City: <b>Jacksonville</b> County: <b>Duval</b> Zip Code: <b>32218-2260</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Jeffery Walker, Environmental Manager</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Cedar Bay Generating Company</b> Street Address: <b>9640 Eastport Road</b> City: <b>Jacksonville</b> State: <b>FL</b> Zip Code: <b>32218-2260</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(904) 696-1547</b> ext.      Fax: <b>(904) 751-7320</b>	
4. Application Contact Email Address: <b>jeffwalker@cogentrix.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application: <b>6-20-04</b>	3. PSD Number (if applicable):
2. Project Number(s): <b>0310337-012-AC</b>	4. Siting Number (if applicable):

## APPLICATION INFORMATION

### Purpose of Application

**This application for air permit is submitted to obtain: (Check one)**

#### **Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

#### **Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment

**This application is to request that the limits for the amount of fuel used in Absorber Dryer System Train – 1 and Absorber Dryer System Train – 2 be temporarily raised to a total of 996,000 gallons/yr for the years 2006 and 2007.**

See Part II.

# APPLICATION INFORMATION

## Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
004	Absorber Dryer System Train – 1 (Dryer and Handling System)	AC1E	N/A
005	Absorber Dryer System Train – 2 (Dryer and Handling System)	AC1E	N/A

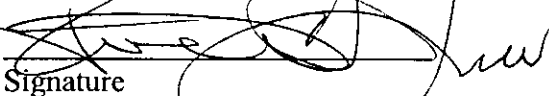
### Application Processing Fee

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
<b>Richard Grubb, General Manager</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>Cedar Bay Generating Company</b> Street Address: <b>9640 Eastport Road</b> City: <b>Jacksonville</b> State: <b>FL</b> Zip Code: <b>32218-2260</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(904) 696-1143</b> ext. Fax: <b>(904) 751-7320</b>
4. Owner/Authorized Representative Email Address: <b>rickgrubb@cogentrix.com</b>
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>   Signature  <u>June 15, 2006</u> Date

## APPLICATION INFORMATION

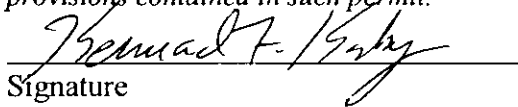
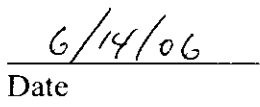

### Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:			
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):			
<input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.			
<input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively.			
<input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.			
<input type="checkbox"/> The designated representative at an Acid Rain source.			
3. Application Responsible Official Mailing Address...			
Organization/Firm:			
Street Address:			
City:	State:	Zip Code:	
4. Application Responsible Official Telephone Numbers...			
Telephone: ( )	-	ext.	Fax: ( ) -
5. Application Responsible Official Email Address:			
6. Application Responsible Official Certification:			
<i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>			
_____ Signature		_____ Date	

# APPLICATION INFORMATION

## Professional Engineer Certification

1. Professional Engineer Name: <b>Kennard F. Kosky</b> Registration Number: <b>14996</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 336-5600</b> ext. <b>516</b> Fax: <b>(352) 336-6603</b>
4. Professional Engineer Email Address: <b>kkosky@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i>  <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i>  <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i>  <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i>  <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i>  <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>   Signature  Date  (seal) 

\* Attach any exception to certification statement.

\*\* Board of Professional Engineers Certificate of Authorization #00001670



## FACILITY INFORMATION

### II. FACILITY INFORMATION

#### A. GENERAL FACILITY INFORMATION

##### Facility Location and Type

1. Facility UTM Coordinates... Zone 17      East (km) <b>441.610</b> North (km) <b>3365.552</b>		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) <b>30/25/21</b> Longitude (DD/MM/SS) <b>81/36/23</b>	
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>49</b>	6. Facility SIC(s): <b>4911</b>
7. Facility Comment :  <b>Applicant is seeking to temporarily increase the limit of fuel usage to 996,000 gallons/yr for the years 2006 and 2007. See Part II.</b>			

##### Facility Contact

1. Facility Contact Name: <b>Jeffery Walker, Environmental Manager</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>Cedar Bay Generating Company</b> Street Address: <b>9640 Eastport Road</b> City: <b>Jacksonville</b> State: <b>FL</b> Zip Code: <b>32218-2260</b>
3. Facility Contact Telephone Numbers: Telephone: <b>(904) 696-1547</b> ext.      Fax: <b>(904) 751-7320</b>
4. Facility Contact Email Address: <b>jeffwalker@cogentrix.com</b>

##### Facility Primary Responsible Official

**Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."**

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City:      State:      Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) -      ext.      Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

## FACILITY INFORMATION

### Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	
<p><b>The application facility-wide conditions contained in the Title V Air Operation permit will not change as a result of this application.</b></p>	

**FACILITY INFORMATION**

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
<b>PM – Particulate Matter Total</b>	<b>A</b>	<b>N</b>
<b>PM<sub>10</sub> – Particulate Matter</b>	<b>A</b>	<b>N</b>
<b>NO<sub>x</sub> – Nitrogen Oxide</b>	<b>A</b>	<b>N</b>
<b>SO<sub>2</sub> – Sulfur Dioxide</b>	<b>A</b>	<b>N</b>
<b>CO – Carbon Monoxide</b>	<b>A</b>	<b>N</b>
<b>VOC – Volatile Organic Compounds</b>	<b>A</b>	<b>N</b>

**FACILITY INFORMATION**

**B. EMISSIONS CAPS**

**Facility-Wide or Multi-Unit Emissions Caps**

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

[Empty comment box area]

## FACILITY INFORMATION

### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>January 2004</b>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>January 2004</b>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>January 2004</b>

#### Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: <b>See Part II</b>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <b>See Part II</b>
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

## FACILITY INFORMATION

### Additional Requirements for FESOP Applications

- |                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):<br><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility) |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### Additional Requirements for Title V Air Operation Permit Applications

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. List of Insignificant Activities (Required for initial/renewal applications only):<br><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (revision application)                                                                                                                                                                                                                                         |
| 2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):<br><input type="checkbox"/> Attached, Document ID: _____<br><input checked="" type="checkbox"/> Not Applicable (revision application with no change in applicable requirements)                                                                           |
| 3. Compliance Report and Plan (Required for all initial/revision/renewal applications):<br><input type="checkbox"/> Attached, Document ID: _____<br>Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing. |
| 4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):<br><input type="checkbox"/> Attached, Document ID: _____<br><input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed<br><input checked="" type="checkbox"/> Not Applicable                                                                                                                     |
| 5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :<br><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable                                                                                                                                                                                                                          |
| 6. Requested Changes to Current Title V Air Operation Permit:<br><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable                                                                                                                                                                                                                                                                                        |

### Additional Requirements Comment

See Part II.

## EMISSIONS UNIT INFORMATION

Section [1]  
ADS Trains 1 & 2

### III. EMISSIONS UNIT INFORMATION

**Title V Air Operation Permit Application** - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

**Air Construction Permit or FESOP Application** - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application** - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

# EMISSIONS UNIT INFORMATION

Section [1]  
ADS Trains 1 & 2

## A. GENERAL EMISSIONS UNIT INFORMATION

### Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

### Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

**Adsober Dryer System (ADS) Trains 1 and 2.**

3. Emissions Unit Identification Number: **004 & 005**

4. Emissions Unit Status Code: <b>C</b>	5. Commence Construction Date: <b>N/A</b>	6. Initial Startup Date: <b>N/A</b>	7. Emissions Unit Major Group SIC Code: <b>49</b>	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--------------------------------------------	----------------------------------------------	----------------------------------------	------------------------------------------------------	----------------------------------------------------------------------------------------------

9. Package Unit:  
Manufacturer:

Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

**ADS Trains 1 & 2 crush and dry limestone for use in the circulating fluidized bed (CFB) boilers.**



**EMISSIONS UNIT INFORMATION**

Section [1]  
ADS Trains 1 & 2

**Emissions Unit Control Equipment**

1. Control Equipment/Method(s) Description:

**Fabric Filter – Medium Temperature**

2. Control Device or Method Code(s): **017**

# EMISSIONS UNIT INFORMATION

Section [1]  
ADS Trains 1 & 2

## B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

### Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: <b>42.6 tons/hr limestone</b>
2. Maximum Production Rate:
3. Maximum Heat Input Rate: <b>16.1 million Btu/hr</b>
4. Maximum Incineration Rate:     pounds/hr tons/day
5. Requested Maximum Operating Schedule: <b>22 hours/day</b> <b>7 days/week</b> <b>52 weeks/year</b> <b>8,030 hours/year</b>
6. Operating Capacity/Schedule Comment:

**EMISSIONS UNIT INFORMATION**

Section [1]  
 ADS Trains 1 & 2

**C. EMISSION POINT (STACK/VENT) INFORMATION**  
 (Optional for unregulated emissions units.)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: <b>See Part II</b>		2. Emission Point Type Code: <b>2</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:  <b>ADS Train 1 stack (ADS Trains 1 &amp; 2 are identical)</b>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>63 feet</b>	7. Exit Diameter: <b>4.17 feet</b>	
8. Exit Temperature: <b>195 °F</b>	9. Actual Volumetric Flow Rate: <b>49,000 acfm</b>	10. Water Vapor: <b>1 %</b>	
11. Maximum Dry Standard Flow Rate: <b>42,100 dscfm</b>		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: <b>17</b> East (km): <b>441.66</b> North (km): <b>3365.68</b>		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

**EMISSIONS UNIT INFORMATION**Section [1]  
ADS Trains 1 & 2**D. SEGMENT (PROCESS/FUEL) INFORMATION****Segment Description and Rate: Segment 1 of 2**

1. Segment Description (Process/Fuel Type):  <b>Segment 1 of 2: No. 2 Diesel fuel combustion</b>			
2. Source Classification Code (SCC): <b>30590001</b>		3. SCC Units: <b>1,000 gallons</b>	
4. Maximum Hourly Rate: <b>0.120</b>	5. Maximum Annual Rate: <b>996</b>	6. Estimated Annual Activity Factor:	
7. Maximum % Sulfur: <b>0.05</b>	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>134</b>	
10. Segment Comment:  <b>See Part II.</b>			

**Segment Description and Rate: Segment 2 of 2**

1. Segment Description (Process/Fuel Type):  <b>Segment 2 of 2: Mineral Products - Other</b>			
2. Source Classification Code (SCC): <b>30599999</b>		3. SCC Units: <b>Tons</b>	
4. Maximum Hourly Rate: <b>42.6</b>	5. Maximum Annual Rate: <b>342,078</b>	6. Estimated Annual Activity Factor:	
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:	
10. Segment Comment:  <b>Limestone capacities provided. See Part II.</b>			

**EMISSIONS UNIT INFORMATION**

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ADS Trains 1 & 2

**E. EMISSIONS UNIT POLLUTANTS**

**List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	017		EL
PM <sub>10</sub>	017		EL
NO <sub>x</sub>			NS
SO <sub>2</sub>			EL
CO			NS
VOC			NS

**EMISSIONS UNIT INFORMATION**

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ADS Trains 1 & 2

**POLLUTANT DETAIL INFORMATION**

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Particulate Matter Total - PM

**FI. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>PM (TSP)</b>		2. Total Percent Efficiency of Control: <b>99+</b>	
3. Potential Emissions: <b>1.08 lb/hour                      8.69 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.003 gr/dscf</b>  Reference: <b>Decker Industries</b>		7. Emissions Method Code: <b>0</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:  <b>0.003 gr/dscf x 42,100 dscf/min x 1 lb/7,000 gr x 60 min/hr = 1.08 lb/hr per ADS Train</b> <b>1.08 lb/hr x 8,030 hr/yr x 2,000 lb/ton x 2 ADS Trains = 8.69 TPY per ADS Train pair</b>			
11. Potential Fugitive and Actual Emissions Comment:  <b>See Part II.</b>			

**EMISSIONS UNIT INFORMATION**

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ADS Trains 1 & 2

**POLLUTANT DETAIL INFORMATION**

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Particulate Matter Total - PM

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.003 gr/dscf / 5 percent opacity</b>	4. Equivalent Allowable Emissions: <b>1.08 lb/hour                      8.69 tons/year</b>
5. Method of Compliance: <b>Initial compliance test using EPA Method 5 or 17; 40 CFR, Appendix A; subsequent tests using EPA Method 9.</b>	
6. Allowable Emissions Comment (Description of Operating Method):  <b>See Part II.</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <b>lb/hour                      tons/year</b>
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <b>lb/hour                      tons/year</b>
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

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ADS Trains 1 & 2

**POLLUTANT DETAIL INFORMATION**

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Particulate Matter - PM<sub>10</sub>

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>PM<sub>10</sub></b>		2. Total Percent Efficiency of Control: <b>99+</b>	
3. Potential Emissions: <b>1.08 lb/hour                      8.69 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.003 gr/dscf</b>  Reference: <b>Decker Industries</b>		7. Emissions Method Code: <b>0</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:  <b>0.003 gr/dscf x 42,100 dscf/min x 1 lb/7,000 gr x 60 min/hr = 1.08 lb/hr per ADS Train</b> <b>1.08 lb/hr x 8,030 hr/yr x 2,000 lb/ton x 2 ADS Trains = 8.69 TPY per ADS Train pair</b>			
11. Potential Fugitive and Actual Emissions Comment:  <b>See Part II.</b>			



**EMISSIONS UNIT INFORMATION**

**POLLUTANT DETAIL INFORMATION**

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ADS Trains 1 & 2

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Particulate Matter - PM<sub>10</sub>

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.003 gr/dscf / 5 percent opacity</b>	4. Equivalent Allowable Emissions: <b>1.08 lb/hour      8.69 tons/year</b>
5. Method of Compliance: <b>Initial compliance test using Method 5 or 17; 40 CFR, Appendix A; subsequent tests using EPA Method 9.</b>	
6. Allowable Emissions Comment (Description of Operating Method):  <b>See Part II.</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

**POLLUTANT DETAIL INFORMATION**

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Sulfur Dioxide

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: <b>SO<sub>2</sub></b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>0.84 lb/hour                      3.49 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.05 percent sulfur distillate oil</b>  Reference:		7. Emissions Method Code: <b>0</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:  <b>0.05 percent x 1/100 x 120.0 gal/hr x 7 lb/gal x 2 lb SO<sub>2</sub>/lb sulfur = 0.84 lb/hr per ADS Train</b>  <b>996,000 gal/yr x 7 lb/gal x 0.05 percent x 1/100 x 2 lb SO<sub>2</sub>/lb S x 2000 lb/ton = 3.49 TPY per ADS Train pair</b>			
11. Potential Fugitive and Actual Emissions Comment:  <b>See Part II.</b>			

**EMISSIONS UNIT INFORMATION**

**POLLUTANT DETAIL INFORMATION**

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Sulfur Dioxide

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.05 percent sulfur</b>	4. Equivalent Allowable Emissions: <b>0.84 lb/hour      3.49 tons/year</b>
5. Method of Compliance: <b>Fuel vendor analysis</b>	
6. Allowable Emissions Comment (Description of Operating Method):  <b>See Part II.</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

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ADS Trains 1 & 2

**POLLUTANT DETAIL INFORMATION**

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Nitrogen Oxides

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: <b>NO<sub>x</sub></b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>2.41 lb/hour                      10.01 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.15 lb/MMBtu</b>  Reference: <b>PA88-24A</b>		7. Emissions Method Code: <b>0</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:  <b>16.1 MMBtu/hr x 0.15 lb/MMBtu = 2.41 lb/hr per ADS Train</b>  <b>996,000 gal/yr x 134,000 Btu/gal x 0.15 lb/MMBtu x MMBtu/10<sup>6</sup> x 2,000 lb/ton = 10.01 TPY per ADS Train pair</b>			
11. Potential Fugitive and Actual Emissions Comment:  <b>See Part II.</b>			

**EMISSIONS UNIT INFORMATION**

**POLLUTANT DETAIL INFORMATION**

Section [1]  
ADS Trains 1 & 2

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Nitrogen Oxides

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <b>2.41 lb/hour      10.01 tons/year</b>
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):  <b>See Part II.</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

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 ADS Trains 1 & 2

**POLLUTANT DETAIL INFORMATION**

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 Carbon Monoxide

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>CO</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>0.60 lb/hour</b> <b>2.50 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.0375 lb/MMBtu</b>  Reference: <b>PA 88-24A</b>		7. Emissions Method Code: <b>0</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:  $16.1 \text{ MMBtu/hr} \times 0.0375 \text{ lb/MMBtu} = 0.60 \text{ lb/hr per ADS Train}$  $996,000 \text{ gal/yr} \times 134,000 \text{ Btu/gal} \times 0.0375 \text{ lb/MMBtu} \times \text{MMBtu}/10^6 \times 2000 \text{ lb/ton} = 2.50 \text{ TPY per ADS Train pair}$			
11. Potential Fugitive and Actual Emissions Comment:  <b>See Part II.</b>			

**EMISSIONS UNIT INFORMATION**

**POLLUTANT DETAIL INFORMATION**

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Carbon Monoxide

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <b>0.60 lb/hour          2.50 tons/year</b>
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):  <b>See Part II.</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour          tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour          tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

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**POLLUTANT DETAIL INFORMATION**

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 Volatile Organic Compounds

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>VOC</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>0.05 lb/hour                      0.20 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.003 lb/MMBtu</b>  Reference: <b>PA 88-24A</b>		7. Emissions Method Code: <b>0</b>	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From:                      To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:  $16.1 \text{ MMBtu/hr} \times 0.003 \text{ lb/MMBtu} = 0.05 \text{ lb/hr per ADS Train}$ $996,000 \text{ gal/yr} \times 134,000 \text{ BTU/gal} \times 0.003 \text{ lb/MMBtu} \times \text{MMBtu}/10^6 \times 2000 \text{ lb/ton} = 0.20 \text{ TPY per ADS Train pair}$			
11. Potential Fugitive and Actual Emissions Comment:  <b>See Part II.</b>			



**EMISSIONS UNIT INFORMATION**

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**POLLUTANT DETAIL INFORMATION**

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Volatile Organic Compounds

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <b>0.05 lb/hour      0.20 tons/year</b>
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):  <b>See Part II.</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

# EMISSIONS UNIT INFORMATION

Section [1]  
ADS Trains 1 & 2

## G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE</b>	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>5 %</b> Exceptional Conditions: <b>100 %</b> Maximum Period of Excess Opacity Allowed: <b>60 min/hour</b>	
4. Method of Compliance: <b>EPA Method 9.</b>	
5. Visible Emissions Comment:  <b>Exceptional conditions allowed for 2 hours per 24-hour period by Rule 62-210.700(1) for Startup, Shutdown, and Malfunction.</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_ of \_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

**EMISSIONS UNIT INFORMATION**

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**H. CONTINUOUS MONITOR INFORMATION**

Complete if this emissions unit is or would be subject to continuous monitoring.

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

# EMISSIONS UNIT INFORMATION

Section [1]  
ADS Trains 1 & 2

## I. EMISSIONS UNIT ADDITIONAL INFORMATION

### Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>See Part II</b> <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>See Part II</b> <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>See Part II</b> <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input checked="" type="checkbox"/> Attached, Document ID: <b>See Part II</b> <input type="checkbox"/> Not Applicable

## EMISSIONS UNIT INFORMATION

Section [1]  
ADS Trains 1 & 2

### Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

### Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable

**EMISSIONS UNIT INFORMATION**

Section [1]  
ADS Trains 1 & 2

Additional Requirements Comment

**PART II**

## PART II

### 1.0 INTRODUCTION

Cedar Bay Generating Company, L.P. (Cedar Bay) is seeking authorization from the Florida Department of Environmental Protection (FDEP) to temporarily increase the amount of Number 2 fuel oil used in the operation of the Absorber Dryer System (ADS) Trains at the Cedar Bay Cogeneration Facility from a maximum of 700,800 gallons per year (gal/yr) to a maximum of 996,000 gal/yr. Currently, the facility has two 40-ton-per-hour (TPH) ADS trains that process limestone as a reactant for the circulating fluidized bed (CFB) boilers to control sulfur dioxide (SO<sub>2</sub>) and other acid gases. Limestone is sized (crushed) and dried in the existing ADS trains for use in the CFB boilers. The current systems are identical and referred to as ADS Trains 1 and 2. These existing systems are identified in the Title V permit as Emission Units 004 and 005. The existing ADS trains have experienced operational problems, including loss of fuel efficiency, and are near the end of their useful life without refurbishment.

### 2.0 PROJECT DESCRIPTION

Limestone delivered to the facility is stored in an open pile. The limestone is then transferred by a front-end loader from the pile to a reclaim hopper. An enclosed feeder directs the limestone into the ADS trains. Each ADS train consists of a No. 2 fuel oil-fired dryer, a limestone crusher, a limestone cyclone classifier, a limestone screener, and a limestone vibrating pan conveyor. Each ADS train operates at a throughput rate of 49,000 actual cubic feet per minute (acfm).

### 3.0 AIR EMISSIONS

The air emissions for the existing fuel use limit of 700,800 gal/yr and the proposed limit of 996,000 gal/yr are listed in Table 1. The existing ADS trains utilize a fabric filter for particulate matter (PM) removal and low-sulfur distillate oil. The PM emission rate is based on 0.003 grain per dry standard cubic feet (gr/dscf), which is a condition of the existing Title V Permit (Condition B.5). The emissions of SO<sub>2</sub> are based on the use of 0.05 percent sulfur and the maximum hourly rate of 120 gal/hr/dryer and 996,000 gal/yr. The short-term emission rates for nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) are based on emissions contained in the Site Certification for the facility (PA 88-24A).



#### 4.0 REGULATORY APPLICABILITY

The project consists of temporarily increasing the annual amount of distillate oil used in ADS Trains 1 and 2 from 700,800 to 996,000 gal/yr. The net increase in air emissions for the project at the maximum annual usage are less than the thresholds requiring review under the Prevention of Significant Deterioration (PSD) rules in Chapter 62-212 of the Florida Administrative Code (F.A.C.). The maximum potential emissions for PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC for increasing the annual fuel usage are <1, 1.03, 3.0, 0.74, and 0.06 tons per year (TPY), respectively (see Table 1). The PSD review thresholds are 25/15, 40, 40, 100, and 40 TPY, for PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC, respectively. It should be noted that the maximum potential emissions for using a total of 996,000 gal/yr are still less than the PSD review thresholds (see Table 1). With a maximum fuel usage of 996,000 gal/yr, the PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions are 8.69, 3.49, 10.01, 2.97, and 0.60 TPY, respectively. As a result, the project does not trigger PSD review and only requires a minor source air construction permit pursuant to the FDEP rules.

Based on the regulatory applicability for the project, Cedar Bay requests FDEP's consideration of the following change in the currently authorized permit condition for ADS Trains 1 and 2.

**B.1. Methods of Operation.**

- a. Fuel. The ADS-1 and ADS-2 dryers are permitted to fire only No. 2 fuel oil. The maximum firing rate of No. 2 fuel oil for each ADS dryer shall not exceed 120 gals/hr nor 350,400 gals/yr. This reflects a combined total fuel oil firing rate of 240 gals/hr and 996,000 700,800 gals/yr, for the two ADS trains in the calendar years 2006 and 2007. Thereafter, the distillate oil usage is limited to 700,800 gallons/year. See Specific Conditions **B.7** and **B.17**.

**TABLE 1**  
**ABSORBER DRYER SYSTEM (ADS) TRAINS 1 AND 2 CAPACITY**  
**AND MAXIMUM POTENTIAL EMISSIONS**

	Existing Data	Proposed Data	Increase	Units
Drying Capacity	42.6	42.6	-	tons/hour per ADS Train
	342,078	342,078	-	tons/yr per ADS Train
Fuel Rate	120.0	120.0	-	gal/hr per ADS Train
	700,800	996,000	295,200	gal/yr per ADS Train pair
Fuel Heat Content	19,150	19,150	-	Btu/lb per ADS Train
Fuel Density	7.0	7.0	-	lb/gal per ADS Train
Heat Input	16.1	16.1	-	MMBtu/hr per ADS Train
Exhaust Flow	42,100	42,100	-	dscfm per ADS Train
	49,000	49,000	-	acfm per ADS Train
Stack Height	63.0	63.0	-	feet per ADS Train
Stack Diameter	4.2	4.2	-	feet per ADS Train
Stack Temperature	195.0	195.0	-	°F per ADS Train
Emissions				
PM/PM <sub>10</sub>	0.003	0.003	-	gr/dscf <sup>a</sup>
	1.08	1.08	-	lb/hr per ADS Train
	8.69	8.69	-	tons/year per ADS Train pair
SO <sub>2</sub>	0.05%	0.05%	-	sulfur by weight
	0.84	0.84	-	lb/hr per ADS Train
	2.45	3.49	1.03	tons/year per ADS Train pair
NO <sub>x</sub>	0.15	0.15	-	lb/MMBtu <sup>b</sup>
	2.41	2.41	-	lb/hr per ADS Train
	7.04	10.01	2.97	tons/year per ADS Train pair
CO	0.0375	0.0375	-	lb/MMBtu <sup>b</sup>
	0.60	0.60	-	lb/hr per ADS Train
	1.76	2.50	0.74	tons/year per ADS Train pair
VOC	0.003	0.003	-	lb/MMBtu <sup>b</sup>
	0.05	0.05	-	lb/hr per ADS Train
	0.14	0.20	0.06	tons/year per ADS Train pair

<sup>a</sup> Based on manufacturer information.

<sup>b</sup> Based on PA88-24A.