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0310337-002-AV

Cedar Bay Generating Company,  
L.P.

*Memorandum*

**To:** Wendy Alexander

**Date:** November 18, 1998

**Subject:** Missing Page 28

**From:** Jeff Walker

**Copies:**

**File:** Title V

Wendy

Please find four copies of page 28 that belongs in the Facility and Source Specific Regulatory Applicability and Compliance Evaluation table. This table was recently submitted to the FDEP in a revision to Cedar Bay's Title V application.

Thank You  
Jeff Walker

**Cedar Bay Generating Company, L.P.**

Cedar Bay Generating Company, L.P.  
P.O. Box 26324  
Jacksonville, FL 32226  
Tel: 904.751.4000  
Fax: 904.751.7320

October 2, 1998

Scott Sheplak  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FL 32399-2400

**RE: Cedar Bay Generating Company, Jacksonville  
Revisions to Title V Application  
ENSR Project Proposal Number**

Dear Mr. Sheplak:

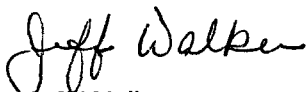
Enclosed are revisions to the Title V Application for the Cedar Bay Cogeneration Plant in Jacksonville. These pages replace the corresponding pages in the original application submittal, and are divided into three parts:

- Introduction (entire section)
- Forms (replacement pages)
- Attachment CB01 (entire section)

Please substitute these pages accordingly. If you have any question or comments, please call either Jeff Walker at (904) 751-4000 ext. 22, or Keith Field at ENSR (256) 767-1210. Thank you.

Sincerely,

  
for Tim Cotner  
Plant Manager

  
Jeff Walker  
Environmental Manager

enclosure  
T5Revlet.doc  
cc: Michelle Golden

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## INTRODUCTION

### **Background**

Cedar Bay Generating Company, L.P. owns and operates the Cedar Bay Cogeneration (CBC) facility located in Jacksonville, Florida. This facility is subject to the major source operating permit program under Title V of the Clean Air Act Amendments of 1990 (CAAA). This document is intended to fulfill the requirements of the Title V Operating Permit application submittal pursuant to Section 62-210 and 62-213, Florida Administrative Code (F.A.C.).

### **Scope**

This application is submitted for the entire CBC facility and addresses those emissions, sources, activities, and requirements subject to Title V of the CAAA and Section 62-210 and 62-213, F.A.C. It also covers those issues which need to be addressed for the development of a comprehensive Title V permit that would enable the CBC facility to successfully operate in compliance with all applicable requirements and remain competitive in the cogeneration business.

### **Objectives**

It is the objective of this permit application to present to the permitting authority all the necessary and required information for the issuance of a Title V Operating Permit to the CBC facility in compliance with the requirements of Section 62-210 and 62-213, F.A.C. Cedar Bay Generating Company's intent is to present a permit application with good faith estimates of all relevant data and applicable requirements to support a valid compliance determination certification and a completeness determination.

Cedar Bay Generating Company believes certain issues and objectives are critical in the conduct of its business in order to successfully operate and remain competitive in the cogeneration industry. The major objectives sought in this permit application are stated below.

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## **Alternate Operating Scenarios**

### **Alternate Mode of Operation - Ash Handling**

Two operating scenarios have been identified for ash handling operations:

- 1) Dry Ash Loadout
- 2) Ash Pelletizing

Dry ash loadout refers to the loading of dry fly ash and bed ash onto trucks or railcars. Emissions from this loading are controlled by a baghouse, with Emission Point Number (EPN) designation A18.

Ash pelletizing refers to all operations necessary for the pelletization of the ash that are not also necessary for dry ash loadout.

The current permit states that these operations cannot be conducted simultaneously. These two scenarios have been presented in the permit application with this understanding. They are represented by alternate modes of operation, since the result is an emissions trade.

### **Alternate Method of Operation - Full Flow Reheat Bypass**

An alternate method of operation has been identified for the boilers, full flow reheat bypass (FFRB). For the purposes of this application,

"Full flow reheat bypass" (FFRB) shall be defined as the mode of operation in which steam is supplied while the turbine generator is removed from service by bypassing steam from the main steam piping to the cold reheat piping then passing this steam through both reheater sections.

Full flow reheat bypass is an operating condition in which the Cedar Bay facility is supplying up to 380,000 lb/hr of process steam to the adjacent Seminole Kraft facility while the steam turbine is out of service. This is accomplished by bypassing steam from the main steam piping to the reheater sections of a boiler. The system is duplicated in each of the three boilers to offer the maximum degree of flexibility and redundancy.

In order to bring a CFB into FFRB, the boiler must first be shut down, then restarted firing fuel oil. Therefore, the transition of a CFB into FFRB should be considered a startup condition. Similarly, the boiler must be shut down and restarted to switch from FFRB to normal operation

with the turbine on. Furthermore, due to the low, variable steam demand from Smurfit-Stone Container and corresponding fuel loading during FFRB, the CFB bed is likely to occasionally cool to below 1400°F, thereby requiring supplemental oil firing with a corresponding increase in CO emissions. In other words, the CFB is again in transition to sustainable coal firing temperatures, and is therefore in startup condition. However, FFRB can be operated at sustainable coal firing temperatures for an extended period given sufficient, consistent steam demand from Smurfit-Stone Container. FFRB would therefore be treated as normal operation with corresponding applicable requirements unless a shutdown/startup condition as described in this paragraph occurs.

Incorporation of this or a similar definition into the existing site certification is currently being pursued, thus an amendment to the Title V Operating Permit and or Permit Application may be required.

### **Startup and Shutdown of the CFBC Boilers**

Startup and shutdown of the Circulating Fluidized Bed Combustion boilers (CFBCs) requires oil-firing, which can lead to increased CO emissions. For the purposes of this permit application, startup of the CFBCs is defined as follows:

A boiler is considered "down" when no solid fuel is being fired and the bed temperature is less than 1400°F. During FFRB, a drop in bed temperature below 1400°F shall be considered down.

"Startup" shall be defined as the time between boiler down and 8 hours after the bed reaches 1400°F, thereby allowing the cessation of oil firing, including the entire time required for refractory curing following replacement of refractory during an outage, and including the time required to return the bed temperature to normal during FFRB.

Incorporation of these or similar definitions into the existing certification is currently being pursued, thus an amendment to the Title V Operating Permit and or Permit Application may be required.

Procedures for Startup and Shutdown are further detailed in document CB03, attached.

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## **Record Keeping and Reporting**

Cedar Bay Generating Company believes the record keeping and reporting requirements specified in its current permit are sufficient to ensure compliance with the applicable requirements for the CBC facility, with the exception of FFRB as discussed above. Cedar Bay Generating Company is therefore currently seeking to incorporate a modification to the existing certification to reflect FFRB as an allowable exception, to be reported as such in the quarterly reports by modification of the Specific Condition II A 11 c 2 to read:

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, *full flow reheat bypass*, and malfunctions of the furnace boiler system. the nature and cause of any malfunction (if known) and the corrective action taken or preventive measures adopted (40 CFR 60.7(c)(2)).

## **Exempt Sources**

On April 2, 1996, Cedar Bay Generating Company sent to Mr. Bruce Mitchell a letter requesting exemption for several insignificant sources pertaining to the Cedar Bay Generating Facility. FL DEP responded, indicating that the procedure for identifying insignificant sources had changed, that trivial sources on the approved FL DEP "Trivial List of Activities" did not need to be presented in the application. Rule 62-213.430(6)(a) states "All requests for exemption of emissions units or activities made pursuant to Rule 62-213.420(3)(m), F.A.C., shall be processed in conjunction with the permit...application submitted pursuant to this chapter." CBC is requesting for exemption of all sources listed in the April 2, 1996 letter, presented in Section IV of this application.

## **Supplemental Requirements**

Some of the supplemental documents specify much more detail than is warranted for a facility which has already received a PSD permit and passed certification tests. The CBC facility has already demonstrated compliance, by means of quarterly CEM reports and the initial certification tests, which have all been submitted to the FL DEP, and therefore is requesting a waiver for the requirement to submit a Detailed Description of Control Equipment, Description of Stack Sampling Facilities, and Compliance Tests Reports.

## **Fugitive Emissions Identification**

There are several potential sources of fugitive particulate matter (PM) emissions as listed below.

Described in the Coal Handling Section are:

Coal loading, unloading, and conveyor transfer points;  
Coal pile storage wind erosion; and  
Coal pile traffic (heavy equipment).

Described in the Limestone (Aragonite) Handling Section are:

Limestone (Aragonite) unloading and conveyor transfer points;  
Limestone (Aragonite) storage pile; and  
Limestone (Aragonite) truck traffic.

Described in the Ash Handling Section are:

Bed ash rejects;  
Pelletizer system yard area cleanup, mobile equipment transfers; and  
Pelletizer system yard area traffic.

The following are potential sources of fugitive VOC emissions:

Fuel oil, diesel, and gasoline storage tanks and transfer system.

Many of the above result in insignificant emissions and exemptions are requested in Section IV of the application document.

#### **Precautions to Prevent Emissions of Unconfined Particulate Matter**

The CBC facility implements the following measures to control unconfined PM sources of emissions:

Unconfined PM related to coal transfer points is controlled by water spray in key locations, as described in the application forms.

Unconfined PM related to coal, limestone (aragonite) and ash mobile equipment operations is controlled by wetting the coal pile and road surfaces as indicated in the application forms.

The coal pile is wetted by water spray. The 30-day storage pile compaction for the purpose of fire prevention and control also helps reduce PM emissions.

The limestone (aragonite) receiving pile is not wetted, as this would limit its usability. However, the emissions from the pile are insignificant as described in Section IV in the application report.

### **Process Flow Diagrams**

Process Flow Diagrams are incorporated into the appropriate emission unit sections (e.g., Coal Handling, Ash Handling, etc.)

### **Fuel Specifications**

Fuel specification requirements are listed as a condition of the PSD permit. Fuel burned at the CBC facility meets or exceeds these requirements.

### **Format**

This application presents information required and/or requested by the FL DEP in a logical order. Cedar Bay Generating Company first states the purpose of the application, then states several objectives.

Cedar Bay Generating Company supports these objectives by presenting first, the more general facility information per the FL DEP application forms in Sections I and II, followed by emission unit specific information in Section III. Emission Unit sections are grouped by operational relationships as they pertain to emissions. Thus, the following groups were arrived at: coal handling, limestone handling, boilers, ash handling, and the zero discharge water/waste water treatment system. Each group contains the relevant application forms, followed by a process flow diagram, emissions summaries, process data, and the supporting calculations.

Due to the schedule for developing this application, and the various changes made by FL DEP to regulations, application forms and submittal requirements, this application is a composite of old and new application forms. In any given section, forms which would be left blank were removed from the group. The newer forms included a form "G. Emission Unit Pollutants", and are sequenced different from the previous forms. Form "G" in the new set lies between the Segment Information forms ("F") and the Emission Unit Pollutant Detail Information forms ("H"). We therefore incorporated form "G" into the old set of forms between the same information forms "D. Segment Information" and "E. Emission Unit Pollutant Detail Information". Certain forms in the new set were described as used for "Regulated Emission Units Only". Those, and the corresponding forms in the old set, were removed from the unregulated emission units sections.



Other supplemental information is attached, including

- CB01 Compliance Report and Plan;
- CB02 Compliance Certification;
- CB03 Procedures for Startup and Shutdown; and
- CB04 Operation and Maintenance Plan.
- CB05 List of Equipment/Activities Regulated Under Title VI

Other items will be submitted as required and requested by the FL DEP.

**DIVISION OF AIR RESOURCES MANAGEMENT**

**APPLICATION FOR AIR PERMIT - LONG FORM**

See Instructions for Form No. 62-210.900(1)

**I. APPLICATION INFORMATION**

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

**Identification of Facility Addressed in This Application**


Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

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>31DVL160337</b> <input type="checkbox"/> Unknown	
4. Facility Location: <b>U.S. Generating Cedar Bay Facility</b>	
Street Address or Other Locator: <b>9640 Eastport Road</b>	
City: <b>Jacksonville</b>	County: <b>Duval</b> Zip Code: <b>32226</b>
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Application Processing Information (DEP Use)**

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official:  <b>Timothy J. Cotner, General Manager</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: <b>Cedar Bay Generating Company</b> Street Address: <b>P.O. Box 26324</b> City: <b>Jacksonville</b> State: <b>FL</b> Zip Code: <b>32226-6324</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>(904)751-4000, Ext. 17</b> Fax: <b>(904)751-7320</b>
4. Owner/Authorized Representative or Responsible Official Statement:  <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.</i>   Signature _____ Date <u>10-1-98</u>

\* Attach letter of authorization if not currently on file.

## Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

<b>Emissions Unit ID</b>	<b>Description of Emissions Unit</b>	<b>Permit Type</b>
Unknown	Coal Handling System Fugitives	AF2C
006	Coal Crusher Dust Collector (1-BMC-DCO-1)	AF2A
007	Coal Silo Dust collector (1-CHF-DCO-2)	AF2A
020	Coal Car Unloading - removed (part of Fugitives)	N/A
Unknown	Limestone Handling System Fugitives	AF2C
Unknown*	Limestone Dryer/Pulverizer (1-BMC-FLT-1A) and (1-BMC-FLT-1B)	AF2A
*004, 008,005, 024	Removed - Reassigned above	N/A
009	Limestone Hopper 1 Vent Filter (1-BMC-FLT-1)	AF2A
025	Limestone Hopper 2 Vent Filter (1-BMC-FLT-2)	AF2A
Unknown	Limestone Rotary Feeder Vents (6 Feeders/Vents)	AF2A
001	Fluidized Bed Boiler A	AF2B
002	Fluidized Bed Boiler B	AF2B
003	Fluidized Bed Boiler C	AF2B
Unknown	Ash Handling System Fugitives	AF2C
010	Bed Ash Storage Hopper Vent Filter w/Fan (1 ASA-FLT-1)	AF2A
011	Bed Ash Silo Collector (Vents through Ash Mechanical Exhausts) (1 ASA-CO-2)	AF2A
Unknown	Bed Ash Silo Vent Filter (1 ASA-FLT-3), controls truck loadout (no activity), rail loadout, silo transfers	AF2A
012	Fly Ash Collector (Vents through Ash Mechanical Exhausts) (1 ASA-CO-1A)	AF2A

Emissions Unit ID	Description of Emissions Unit	Permit Type
026	Fly Ash Collector (Vents through Ash Mechanical Exhausts) (1 ASA-CO-1B)	AF2A
Unknown	Fly Ash Silo Vent Filter (1 ASA-FLT-2), controls truck load out, rail loadout, silo	AF2A
013	Bed Ash Pelletizer Receiver Vent Filter (1 ASF-FLT-2)	AF2A
014	Fly Ash Receiver Vent Filter (1 ASF-FLT-1)	AF2A
016	Recycle Tank Dust Filter (1 ASF-DCO-2)	AF2A
021	Hydrator Venturi Scrubber (1 ASF-SCB-1)	AF2A
023	Pan Impingement Scrubber (1 ASF-SCB-2)	AF2A
022	Curing Silo Impingement Scrubber (1 ASF-SCB-3)	AF2A
018	Curing Silo Dust Filter (1 ASF DCO-4)	AF2A
029	RR Pellet Load Out Dust Filter (1 ASF-DCO-3)	AF2A
019	Pellet Recycle Belt Head Pulley to Bucket Elevator Dust Filter (1 ASF-DCO-5)	AF2A
015	Pellet Screen Dust Filter (1 ASF-DCO-1)	AF2A
030	Dry Ash Loadout Dust Collector	AF2A
017	Recycle Surge Hopper Filter (500 cfm)	AF2A
Unknown	Zero Discharge WWHU	AF2C
Unknown	Zero Discharge Cooling Tower	AF2C
Notes: AF2A - Initial Certification Test. AF2B - CEMS, or Initial Certification Tests		

**Purpose of Application and Category**

Check one (except as otherwise indicated):

**Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.**

This Application for Air Permit is submitted to obtain:

Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: \_\_\_\_\_

Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: \_\_\_\_\_

Operation permit to be revised: \_\_\_\_\_

Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: \_\_\_\_\_

Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_  
\_\_\_\_\_

**Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.**

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): \_\_\_\_\_

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_

**Category III: All Air Construction Permit Applications for All Facilities and Emissions Units**

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: \_\_\_\_\_

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): \_\_\_\_\_

- Air construction permit for one or more existing, but unpermitted, emissions units.

**Application Processing Fee**

Check one:

Attached - Amount: \$ \_\_\_\_\_

Not Applicable.

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:
2. Projected or Actual Date of Commencement of Construction:
3. Projected Date of Completion of Construction:

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Barry Dean Andrews</b> Registration Number: <b>36024</b>
2. Professional Engineer Mailing Address:  Organization/Firm: <b>ENSR</b> Street Address: <b>2809 West Mall Drive</b> City: <b>Florence</b> State: <b>AL</b> Zip Code: <b>35630</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>(256 ) 767-1210</b> Fax: <b>(256 ) 767-1211</b>



4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(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*

*(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.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ X ] if so), I further certify that, to the best of my knowledge, 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 schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ] 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.*

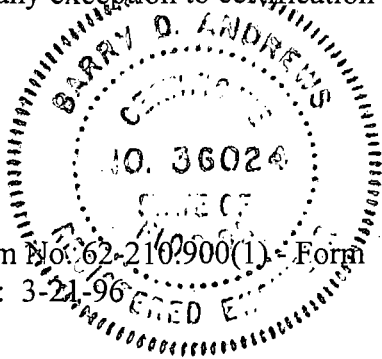
*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such 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.*

*Barry D. Andrews*  
Signature

*9/30/98*  
Date

(seal)

\* Attach any exceptions to certification statement.



**Application Contact**

1. Name and Title of Application Contact:  <b>Jeff Walker, Environmental Manager</b>
2. Application Contact Mailing Address:  Organization/Firm: <b>U.S. Generating Company</b> Street Address: <b>9640 Eastport Road (P.O. Box 26324--Zip Code: 32226-6324)</b> City: <b>Jacksonville</b> State: <b>Florida</b> Zip Code: <b>32218</b>
3. Application Contact Telephone Numbers: Telephone: <b>(904 ) 751-4000, Ext. 22</b> Fax: <b>(904 ) 751-7320</b>

**Application Comment**

<b><u>Alternate Contacts for the Application:</u></b>	
<b>Barry Andrews, P.E.</b>	<b>ENSR Florence (256) 767-1210</b>
<b>Keith Field</b>	<b>ENSR Florence (256) 767-1210</b>
<b>Michelle Golden</b>	<b>U. S. Generating Company (301) 280-6973</b>



**G. CONTINUOUS MONITOR INFORMATION**

This subsection of the Application for Air Permit form must be completed for only those emissions units which are required by rule or permit to install and operate one or more continuous emission, opacity, flow, or other type monitors. A separate set of continuous monitor information (Fields 1-6) must be completed for each monitoring system required.

**Continuous Monitoring System:** Continuous Monitor 1 of 5

1. Parameter Code: <b>NO<sub>x</sub></b>	
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Thermo Electron</b> Model Number: <b>42</b> Serial Number: <b>42-40437-263</b>	
4. Installation Date (DD-MON-YYYY):	
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>	
6. Continuous Monitor Comment:  <b>On Boiler A Baghouse Flue</b>  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>	

Emissions Unit Information Section 9 of 34

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: SO <sub>2</sub>
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: Thermo Electron Model Number: 43A Serial Number: 43A-39572-263
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): 21-JAN-1994
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: CO
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: Thermo Electron Model Number: 48 Serial Number: 48-39881-261
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): 21-JAN-1994
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>

Emissions Unit Information Section 9 of 34

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: <b>CO<sub>2</sub></b>
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Automated Custom systems - Milton Roy 3300</b> Model Number: <b>3300</b> Serial Number: <b>N2E0291T</b>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code: <b>VE</b>
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Enviroplan/Durag</b> Model Number: <b>CEMOP-281</b> Serial Number: <b>29180</b>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): <b>06-FEB-1994 and 13-FEB-1994</b>
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>



Emissions Unit Information Section 10 of 34

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: <b>SO<sub>2</sub></b>
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Thermo Electron</b> Model Number: <b>43A</b> Serial Number: <b>43B-44610-272</b>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: <b>CO</b>
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Thermo Electron</b> Model Number: <b>48</b> Serial Number: <b>48-49897-284</b>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>



Emissions Unit Information Section 10 of 34

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: <b>CO<sub>2</sub></b>		
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Automated Custom Systems -</b> Model Number: <b>3300</b> Serial Number: <b>N2E0308T</b>		
4. Installation Date (DD-MON-YYYY):		
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>		
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>		

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code: <b>VE</b>		
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Enviroplan</b> Model Number: <b>CEMOP-281</b> Serial Number: <b>29175</b>		
4. Installation Date (DD-MON-YYYY):		
5. Performance Specification Test Date (DD-MON-YYYY): <b>06-FEB-1994 and 13-FEB-1994</b>		
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>		

**G. CONTINUOUS MONITOR INFORMATION**

This subsection of the Application for Air Permit form must be completed for only those emissions units which are required by rule or permit to install and operate one or more continuous emission, opacity, flow, or other type monitors. A separate set of continuous monitor information (Fields 1-6) must be completed for each monitoring system required.

**Continuous Monitoring System:** Continuous Monitor 1 of 5

1. Parameter Code: <b>NO<sub>x</sub></b>	
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Thermo Electron</b> Model Number: <b>42</b> Serial Number: <b>42-49661-284</b>	
4. Installation Date (DD-MON-YYYY):	
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>	
6. Continuous Monitor Comment:  <b>On Boiler C Baghouse Flue</b>  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>	

Emissions Unit Information Section 11 of 34

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: <b>SO<sub>2</sub></b>		
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Monitor Information:	Manufacturer: <b>Thermo Electron</b> Model Number: <b>43A</b> Serial Number: <b>43A-39711-263</b>	
4. Installation Date (DD-MON-YYYY):		
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>		
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>		

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: <b>CO</b>		
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other
3. Monitor Information:	Manufacturer: <b>Thermo Electron</b> Model Number: <b>48</b> Serial Number: <b>48-39620-261</b>	
4. Installation Date (DD-MON-YYYY):		
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>		
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>		

Emissions Unit Information Section 11 of 34

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: <b>CO<sub>2</sub></b>
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Automated Custom Systems</b> Model Number: <b>3300</b> Serial Number: <b>N4A1130T</b>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): <b>21-JAN-1994</b>
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code: <b>VE</b>
2. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: <b>Enviroplan</b> Model Number: <b>CEMOP-281</b> Serial Number: <b>29177</b>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY): <b>06-FEB-1994 and 13-FEB-1994</b>
6. Continuous Monitor Comment:  <b>Modifications and other updates to CEMs are provided in quarterly reports where applicable.</b>

**B. GENERAL EMISSIONS UNIT INFORMATION**  
(Regulated and Unregulated Emissions Units)

**Emissions Unit Description and Status**

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): A18: Dry Ash Loadout Baghouse		
2. Emissions Unit Identification Number: [ ] No Corresponding ID [ ] Unknown <b>030</b>		
3. Emissions Unit Status Code: A	4. Acid Rain Unit? [ ] Yes [X] No	5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters):		

**Emissions Unit Control Equipment**

**A.**

1. Description (limit to 200 characters): Fabric Filter - low temp.
2. Control Device or Method Code: 018

**C. EMISSIONS UNIT DETAIL INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Details**

1. Initial Startup Date: 21-Dec-1995		
2. Long-term Reserve Shutdown Date:		
3. Package Unit: Manufacturer:		Model Number:
4. Generator Nameplate Rating:		MW
5. Incinerator Information:		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

**Emissions Unit Operating Capacity**

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate: 6,000 acfm		
4. Maximum Production Rate:		
5. Operating Capacity Comment (limit to 200 characters):		
Emissions related to air flow rate.		

**Emissions Unit Operating Schedule**

Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8760 hours/year



**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

**Pollutant Detail Information:**

1. Pollutant Emitted: PM		
2. Total Percent Efficiency of Control:		> 99 %
3. Potential Emissions:	0.14 lb/hour	0.61 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3      _____ to _____ tons/year		
6. Emission Factor: 0.003 gr/dscf Reference: permit		
7. Emissions Method Code: <input checked="" type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
8. Calculation of Emissions (limit to 600 characters):  See calculations for A18 at end of Ash Handling section.		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):  Based on air flow rate and exit concentration.		



**Emissions Unit Information Section 29 of 34**

**Allowable Emissions** (Pollutant identified on front of page)

**A.**

1. Basis for Allowable Emissions Code: OTHER
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.003 gr/dscf
4. Equivalent Allowable Emissions: 0.14 lb/hour 0.61 tons/year
5. Method of Compliance (limit to 60 characters): Initial Certification test
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):  Model: Will not operate pelletizer.

**B.**

1. Basis for Allowable Emissions Code: OTHER
2. Future Effective Date of Allowable Emissions: 0
3. Requested Allowable Emissions and Units: 0 gr/dscf
4. Equivalent Allowable Emissions: 0 lb/hr 0 tons/year
5. Method of Compliance (limit to 60 characters): Recording of operating times
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):  Mode 2: Will not operate A18.

U.S. GENERATING - CEDAR BAY

A5: FLY ASH SILO SEPARATOR/COLLECTOR; ASA-CO1b

<u>Parameters:</u>		<u>References:</u>
Flow Rate	ACFM := 6074·acfm	ACE May 1994, avg tested is greater than BHA design Air Flow rate of 3000 acfm
Moisture%	Moist := 1.42·%	Air Consulting & Engineering May 1994, avg
Exit Temperature	T := (200 + 460)·R	Air Consulting & Engineering May 1994, avg
Emission Rate	ER := 0.003· $\frac{gr}{dscf}$	Permit Condition
Allowable Hours	OPHR = 8760· $\frac{hr}{yr}$	Permitted operating hours
Potential Emissions:		
SCFM :=	$\frac{ACFM \cdot (1 - Moist) \cdot StdTemp}{T}$	SCFM = 4790·dscfm
E := SCFM·ER	E = 0.12318· $\frac{lb}{hr}$	OPHR·E = 0.5395·tpy

A6: FLY ASH SILO VENT FILTER ASA-FLT-2

<u>Parameters:</u>		<u>References:</u>
Flow Rate	ACFM := 3700·acfm	BHA design Air Flow 3700 (ACE, 1069 acfm)
Moisture%	Moist := 1.58·%	Air Consulting & Engineering April 1994
Exit Temperature	T := (127 + 460)·R	Air Consulting & Engineering April 1994
Emission Rate	ER := 0.003· $\frac{gr}{dscf}$	Permit Condition
Allowable Hours	OPHR = 8760· $\frac{hr}{yr}$	Permitted operating hours
Potential Emissions:		
SCFM :=	$\frac{ACFM \cdot (1 - Moist) \cdot StdTemp}{T}$	SCFM = 3276·dscfm
E := SCFM·ER	E = 0.08423· $\frac{lb}{hr}$	OPHR·E = 0.369·tpy

A18: DRY ASH RAIL CAR LOADOUT BAGHOUSE FILTER

<u>Parameters:</u>		<u>References:</u>
Flow Rate	ACFM := 6000·acfm	Tested at 5355 acfm
Moisture%	Moist := 1·%	Assumed
Exit Temperature	T := (120 + 460)·R	Assumed 120°F
Emission Rate	ER := 0.003· $\frac{gr}{dscf}$	Permit Condition
Allowable Hours	OPHR := 8760· $\frac{hr}{yr}$	No restrictions on operating hours, per K. Grant memo 3/18/96
Potential Emissions:		
SCFM :=	$\frac{ACFM \cdot (1 - Moist) \cdot StdTemp}{T}$	SCFM = 5407·dscfm
E := SCFM·ER	E = 0.14· $\frac{lb}{hr}$	OPHR·E = 0.61·tpy

DOCUMENT CB01  
COMPLIANCE REPORT  
APPLICABLE REQUIREMENTS  
FROM PERMIT PSD FL 137A  
Including Revisions B and C

This document was prepared April 10, 1995, and modified on June 22, 1998, based on PSD FL 137A, 137B, and 137C, and is reprinted for inclusion in the Title V Application for Cedar Bay Cogeneration Plant for reference. The Florida regulatory citations have been restructured since the original issuance of PSD FL 137A.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Basis: PSD FL-137A, B and C. *Italics are sections from PA 88-24 or PA 88-24A which are not also addressed in PSD FL-137A.*

<b>Facility</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Facility	No specific pollutant.	Condition I. 1.	The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727 or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.	N	Information.
Facility	No specific pollutant.	Condition I. 2.	This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.	N	Information.
Facility	No specific pollutant.	Condition I. 3.	As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.	N	Information.
Facility	No specific pollutant.	Condition I. 4.	This permit conveys no title to land or water, does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.	N	Information.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Facility</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Facility	No specific pollutant.	Condition I. 5.	This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.	N	Information.
Facility	No specific pollutant.	Condition I. 6.	The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.	Y	Standard Operating Procedure.
Facility	No specific pollutant.	Condition I. 7.	<p>The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:</p> <ul style="list-style-type: none"> <li>a. Have access to and copy any records that must be kept under the conditions of the permit;</li> <li>b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,</li> <li>c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.</li> </ul> <p>Reasonable time may depend on the nature of the concern being investigated.</p>	Y	Standard Policy.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Facility</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Facility	No specific pollutant.	Condition I. 8.	<p>If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:</p> <ul style="list-style-type: none"> <li>a. A description of and cause of non-compliance; and,</li> <li>b. The period of noncompliance, including dates and times; or , if not corrected the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.</li> </ul> <p>The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.</p>	Y	Will notify immediately if in non-compliance.
Facility	No specific pollutant.	Condition I. 9.	In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.	N	Information.
Facility	No specific pollutant.	Condition I. 10.	The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.	N	Information.
Facility	No specific pollutant.	Condition I. 11.	This permit is transferable only upon Department approval in accordance with Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.	N	Information.

Cedar Bay Cogeneratio . . . , Duval County Florida  
 Facility and Source Specific Regulatory Applicability and Compliance Evaluation

Facility					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Facility	No specific pollutant.	Condition I. 12.	This permit or a copy thereof shall be kept at the work site of the permitted activity.	Y	Standard Operating Procedure
Facility	No specific pollutant.	Condition I. 13.	This permit also constitutes: (x) Determination of Best Available Control Technology (BACT) (x) Determination of Prevention of Significant Deterioration and Nonattainment Areas NSR (x) Compliance with New Source Performance Standards (NSPS; Subpart Da).	N	Information.
Facility	No specific pollutant.	Condition I. 14.	The permittee shall comply with the following: a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample., measurement , report, or application unless otherwise specified by Department rule. c. Records of monitoring information shall include: - The date, exact place, and time of sampling or measurements; - The person responsible for performing the sampling or measurements; - The dates analyses were performed; - The person responsible for performing the analyses; - The analytical techniques or methods used; and, - The results of such analyses.	Y	Records are kept at site.

**Cedar Bay Cogeneration, Inc., Duval County Florida**  
**Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Facility					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Facility	No specific pollutant.	Condition I. 15.	When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.	Y	Example - Coal Unloading changes referred to in letter from R. Pace to K. Oven, wherein the State expressed disagreement in matter that the change took place. Original permit described a scrubber where only wet suppression was put in place.
Facility	No specific pollutant.	Condition B 10	Compliance test reports shall be submitted to the RESD within 45 days of test completion in accordance with Rule 62-297.570, F.A.C.	Y	Will submit within time frame.
Facility	No specific pollutant.	Condition B 11	Any changes in the method of operation, raw materials processed, equipment, or operating hours or any other changes pursuant to Rule 62-212.200, F.A.C., defining modification, shall be submitted for approval to the Department's BAR	Y	Example - Permit modifications recommended to change "limestone" to "aragonite" and address hours of limestone dryer operation.
Facility	No specific pollutant.	Condition C 10	All CBCP records of documentation shall be kept on file for a minimum of 3 years pursuant to Rule 62-4.160(14), F.A.C.	Y	Standard Operating Procedure.
Facility	No specific pollutant.	E. Modification of Specific Conditions	The Specific Conditions of this permit may be modified in the following manner:		
Facility	No specific pollutant.	Condition E 1	Through the May 11, 1993, Modification of Certification, the Board, which means the Governor and Cabinet, delegated to the Secretary of Department of Environmental Protection the authority to modify, after notice and opportunity for hearing, and conditions pertaining to consumptive use of water, reclaimed water, monitoring, sampling, ground water, surface water, mixing zones, or variances to water quality standards, zones of discharge, leachate control programs, effluent limitations, fuel, or solid waste disposal, right of entry, railroad spur transmission line, access road, pipelines, or designation of agents for the purpose of enforcing the conditions of this permit.	N	Administrative.



**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Facility</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Facility	No specific pollutant.	Condition E 2	All other modifications shall be made in accordance with Section 403.516, F.S.	Y	Modifications to ash handling system are anticipated, including pelletizer operations and possibly silo rail loadout..
<b>Construction Requirements</b>					
Facility	No specific pollutant.	Condition C 1	Beginning one month after certification, CBCP shall submit to the RESD and the Department's BAR, a quarterly status report briefly outlining progress made on engineering design and purchase of major equipment, including copies of technical data pertaining to the selected emission control devices. These data should include, but not limited to, guaranteed efficiency and emission rates, and major parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of any such device. Such disapproval shall be issued within 30 days of receipt of technical data.	Y	Status reports were submitted.  OBSOLETE.
Facility	No specific pollutant.	Condition C 2	CBCP shall report any delays in construction and completion of the project which would delay commercial operation by more than 90 days to the RESD office	Y	Delays were reported.  OBSOLETE.
Facility	Particulate	Condition C 3	Reasonable precautions to prevent fugitive emissions during construction, such as coating of roads and construction sites used by contractors, regrassing or watering areas of disturbed soils, will be taken by CBCP.	Y	Precautions were taken.  OBSOLETE.
Facility	No specific pollutant.	Condition C 8	CBCP shall provide stack sampling facilities as required by Rule 62-297.345, F.A.C.	Y	Sampling facilities have been provided to conduct required testing (initial testing has been completed). Facilities will be maintained for future sampling events.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Facility					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Facility	No specific pollutant.	Condition C 9	Prior to commercial operation of each source, the permittee shall submit to the Department's BAR a standardized plan or procedure that will allow the permittee to monitor emission control equipment efficiency and enable the permittee to return malfunctioning equipment to proper operation as expeditiously as possible	Y	Plan will be updated.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	II. Specific Conditions	General: The construction and operation of Cedar Bay Cogeneration Project (CBCP) shall be in accordance with all applicable provisions of Chap. 62-210 through 62-297, F.A.C. In addition to the foregoing, CBCP shall comply with the following conditions as indicated, which reflect the Conditions of the Modification of Certification dated May 11, 1993.	Y	Informational.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	N/A	A. Emission Limitations for CBCP Boilers			
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	N/A	Condition A 1	Fluidized Bed Coal Fired Boilers		
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (a)	Maximum coal charging rate of each CFB shall neither exceed 104,000 lbs/hr, 39,000 tons/month, nor 390,000 tons/yr. (Combined total of 312,000 lbs/hr, 117,000 tons/month, and 1,170,000 tons/yr for all three CFBs).	Y	Beltscale reading recorded in CISCO DARS.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (b)	Maximum charging rate to each of two CFBs of short fiber recycle rejects from Seminole Kraft Corporation(SKC) recycling process shall not exceed 210 yd <sup>3</sup> /day wet and 69,588 yd <sup>3</sup> /yr wet. (Combined total of 420 yd <sup>3</sup> /day and 139,176 yd <sup>3</sup> /yr wet for the two CFBs that fire recycle rejects).	Y	To be recorded in CISCO DARS. Fiber rejects handling system has not been used as of 6/1/98..
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (b)	The third CFB will not utilize recycle rejects, nor will it be equipped with handling and firing for recycle rejects.	Y	Boiler A is not equipped for fiber rejects.

**Cedar Bay Cogeneratio. ., Duval County Florida**  
**Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (c)	Maximum heat input to each CFB shall not exceed 1063 MMBtu/hr. This reflects a combined total of 3189 MMBtu/hr for all three units	Y	CISCO DARS calculates heat input based on fuel feed rate and fuel analysis.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide	Condition A 1 (d)	Sulfur content of coal shall not exceed 1.2% by weight on annual basis. Sulfur content shall not exceed 1.7% by weight on a shipment (train load) basis	Y	Fuel analyses are recorded in CISCO DARS daily.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide	Condition A 1 (e)	Auxiliary fuel burners - No. 2 fuel oil only with max. sulfur content 0.05% by weight. Fuel oil shall normally only be used for start ups	Y	Contract, Purchase Records, Standard Operating Procedure.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (e)	Maximum annual oil usage shall not exceed 1,900,000 gal/yr	Y	Metering of oil use, recorded in CISCO DARS.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (e)	Maximum heat input from fuel oil shall not exceed 380 MMBtu/hr for each of the CFBs	Y	Heat input from fuel oil based on oil use and fuel analysis is recorded in CISCO DARS.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (f)	CFBs shall be fueled only with fuels permitted in Conditions Nos. II.A.1.a., 1.b. and 1.e. Other fuels and wastes shall not be burned w/o prior specific written approval	Y	Purchase records and contracts.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (g)	CFBs may operate continuously (8760 hr/yr) but shall not exceed 25.98 x 10 <sup>6</sup> MMBtu/yr total annual heat input	Y	Heat input is recorded in CISCO DARS.

**Cedar Bay Cogenerati. ., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 1 (h)	To the extent that it is consistent with Specific Condition No. II.A.1.b and the following, CBCP shall burn all of the short fiber rejects generated by SKC in processing recycled paper.	Y	Fiber rejects handling system has not been used as of 6/1/98.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	N/A	Condition A 2	The emissions from each CFB shall be controlled using the following systems:		
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide and acid gas	Condition A 2 (a)	Limestone injection and fuel sulfur limitations, for control of sulfur dioxide and acid gases	Y	In practice Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Particulate	Condition A 2 (b)	Baghouse, for control of particulate matter	Y	Standard Operating Procedures
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Mercury	Condition A 2 (c)	CBCP shall conduct a test to determine whether substantial additional removal of mercury can be obtained through a carbon injection system for mercury removal which feeds carbon reagent into the CFB exhaust stream prior to the baghouse, as described in Exhibit 74 of the administrative record for the Lee County Resource Recovery Facility	Y	CBCP proposed that mercury test be conducted in two phases. Phase 1 would involve conducting test without carbon injection. Phase 2 would utilize carbon injection. After completing Phase 1, CBCP concluded that baseline mercury emissions were minimal and it would not be necessary to retest with carbon injection. This conclusion and a request that Phase 2 testing not needed was submitted to the Department on November 22, 1994.  THIS CONDITION IS OBSOLETE per letter from Hamilton Oven to Don Beckham dated April 6, 1995.

**Cedar Bay Cogeneratio., Duval County Florida**  
**Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Mercury	Condition A 2 (c)	Within 180 days after initial compliance testing, CBCP shall conduct a test on one CFB to compare mercury emissions to the atmosphere with and without carbon injections. The test program will include the testing of carbon injection between the boiler and the fabric filter. Carbon forms to be tested may include activated carbon with or w/o additives and pulverized coal with or w/o additives.	Y	OBSOLETE per letter from Hamilton Oven to Don Beckham dated April 6, 1995.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Mercury	Condition A 2 (c)	After consultation with the Department, RESD and EPRI, CBC shall submit a mercury control test protocol to the Department for approval by Dec. 1, 1993. Results of the test shall be submitted to the Department within 90 days of completion.	Y	Mercury test protocol submitted prior to December 1, 1993. Test results submitted on November 22, 1994..  THIS CONDITION IS OBSOLETE per letter from Hamilton Oven to Don Beckham dated April 6, 1995.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Mercury	<i>PA-88-24A Condition II.A. 8. c.</i>	<i>Compliance tests shall be performed for mercury (Hg), beryllium (Be), and lead (Pb) until three consecutive tests (including, if successful, the initial compliance test) are within the annual emission limits specified in Condition II.A.3. above. Such tests shall occur, as necessary, in the first, fifth and tenth years and additional successive five year intervals following commercial operation of the Project.</i>	Y	Pending results of second and third tests, as yet to be conducted in 1999 and 2004.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Nitrogen oxides	Condition A 2 (d)	Selective Non-catalytic Reduction(SNCR), for control of NO <sub>x</sub>	Y	Installed ammonia injection; CISCO DARS tracking system.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Carbon monoxide, VOC	Condition A 2 (e)	Good combustion characteristics, which are an inherent part of the CFB technology, for control of carbon monoxide and volatile organic compounds	Y	Combustion monitored Carbon monoxide CEM; CISCO DARS tracking system.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	See Table	Condition A 3.	Limits on Flue Gas Emissions from each CFB (See Table 1)	Y	Passed - March 17, 1994, Interpoll Laboratories Report.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Ammonia	Condition A 4	Ammonia (NH <sub>3</sub> ) slip from exhaust gases shall not exceed 10 ppmvd when burning coal at 100% capacity and 30 ppmvd when burning oil	Y	Passed - March 17, 1994, Interpoll Laboratories Report.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 5	Visible emissions (VE) shall not exceed 20% opacity (6 minute avg.), except for one 6 minute period per hour when VE shall not exceed 27% opacity pursuant to 40 CFR 60.42a	Y	COMs; CISCO DARS tracking system.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 6	Compliance with the emission limits shall be determined by EPA reference tests included in the July 1, 1992 version of 40 CFR 60 and 61, Chapter 62-297, F.A.C., and listed in Specific Condition No. II.A.8. of this permit or by equivalent methods after obtaining prior written Department approval.	Y	Passed - March 17, 1994, Interpoll Laboratories Report.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Carbon monoxide, Nitrogen oxides, and Sulfur dioxide.	Condition A 6	Compliance with the emission limitations in Specific Condition No. II.A.3. for CO, NO <sub>x</sub> , and SO <sub>2</sub> , and with the opacity requirements in Specific Condition No. II.A.5., shall be determined with the continuous emission monitoring systems (CEMS) identified in Specific Condition No. II.A.9.	Y	CEMs for CO, NO <sub>x</sub> , SO <sub>2</sub> , Opacity
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 7	CFBs are subject to 40 CFR 60, Subparts A and Da; except that where requirements within this permit are more restrictive, the requirements of this permit shall apply	Y	Cedar Bay complies with the more restrictive requirements.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A8	Compliance Tests for each CFB	See Comment	Informational: Tests required as follows.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Various	Condition A 8 (a)	Initial and subsequent compliance tests for PM/PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> , CO, VOC, lead, fluorides, ammonia, mercury, beryllium and H <sub>2</sub> SO <sub>4</sub> mist, shall be conducted in accordance with 40 CFR 60.8 (a),(b),(c),(d),(e), and (f)	Y	See condition A8(e), 1 - 18.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Particulate, Carbon monoxide, Sulfur dioxide and Nitrogen oxides.	Condition A 8 (b)	Annual compliance tests shall be performed for PM, CO, SO <sub>2</sub> and NO <sub>x</sub> , commencing no later than 12 months from the initial test	Y	Tests have been conducted annually since February 1995.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 8 (c)	Initial and annual visible emissions compliance tests shall be determined in accordance with 40 CFR 60.11(b) and (e)	Y	Tests were completed. Permit language is somewhat inaccurate, in use of word "determined". Instead of "...compliance tests shall be determined in accordance...", permit should state "...compliance shall be determined by conducting tests in accordance..."
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 8 (d)	Compliance tests shall be conducted between 90 - 100% of the maximum licensed capacity and firing rate for each permitted fuel.	Y	Standard Testing Procedure.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 8 (e)	The following test methods and procedures pursuant to Chapter 62-297, F.A.C., and 40 CFR 60 and 61, or by equivalent methods after obtaining written Department approval, shall be used for compliance testing:	Y	Introduction to testing requirements.



**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Boilers**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 8 (e)(1)	Method 1 for selection of sample site and sample traverses	Y	Method 1 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 8 (e)(2)	Method 2 for determining stack gas flow rate	Y	Method 2 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Oxygen , Carbon dioxide	Condition A 8 (e)(3)	Method 3 or 3A for gas analysis for calculation of percent O <sub>2</sub> and CO <sub>2</sub>	Y	Method 3 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 8 (e)(4)	Method 4 for determining stack gas moisture content to convert the flow rate from actual standard cubic feet to dry standard cubic feet	Y	Method 4 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Particulate.	Condition A 8 (e)(5)	Method 5 or Method 17 for particulate matter	Y	Method 17 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide.	Condition A 8 (e)(6)	Method 6, 6C, or 8 for SO <sub>2</sub>	Y	Method 8 used for initial test. Method 6c used for annual tests.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Nitrogen oxides.	Condition A 8 (e)(7)	Method 7, 7A, 7B, 7C, 7D, or 7E for nitrogen oxides	Y	Method 7E used.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfuric acid mist.	Condition A 8 (e)(8)	Method 8 for sulfuric acid mist	Y	Method 8 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity.	Condition A 8 (e)(9)	Method 9 for visible emissions, in accordance with 40 CFR 60.11 and Appendix A	Y	Method 9 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Carbon monoxide.	Condition A 8 (e)(10)	Method 10 for CO	Y	Method 10 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Lead.	Condition A 8 (e)(11)	Method 12 for lead	Y	Method 12 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Fluorides.	Condition A 8 (e)(12)	Method 13A or 13B for fluorides	Y	Method 13B used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide.	Condition A 8 (e)(13)	Method 19 for sulfur dioxide removal efficiency pursuant to 40 CFR 60.48a	Y	Method 19 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	VOC.	Condition A 8 (e)(14)	Method 18 or 25 for VOCs	Y	Method 25A used.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Mercury.	Condition A 8 (e)(15)	Method 101A for mercury	Y	Method 101A used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Beryllium.	Condition A 8 (e)(16)	Method 104 for beryllium	Y	Method 104 used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	PM10.	Condition A 8 (e)(17)	Method 201 or 201A for PM10 emissions	Y	Method 201A used.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Ammonia.	Condition A 8 (e)(18)	Ammonia (NH <sub>3</sub> ) to be determined by the Department	Y	Ran Kjeldahl Method and M-5 Back-Half Method.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 9	Continuous Emission Monitoring for each CFB	Y	Installed.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide, Nitrogen oxides, Carbon monoxide, and Oxygen or Carbon dioxide.	Condition A 9	CBCP shall install, certify, calibrate, operate, and maintain CEMS for opacity, SO <sub>2</sub> , NO <sub>x</sub> , CO, and O <sub>2</sub> or CO <sub>2</sub> , pursuant to all applicable requirements of Rule 62-296.800, F.A.C.; Chapter 62-297, F.A.C.; 40 CFR 60, Subpart A; 40 CFR 60, Subpart Da, 40 CFR 60, Appendix B; and, 40 CFR 60, Appendix F. These CEMS shall be used to determine compliance with the opacity requirements in Specific Condition No. II.A.3. for CO, NO <sub>x</sub> , and SO <sub>2</sub> , and with the limitations in Specific Condition No. II.A.5.	Y	Standard Operating Procedures. Reports are submitted quarterly.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Boilers**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide, Nitrogen oxides.	Condition A 9	The permittee shall install, certify, calibrate, operate, and maintain multiple span CEMS for sulfur dioxide and nitrogen oxides providing certification tests and calibrations are performed for each span. Each of the CEMS for sulfur dioxide and nitrogen oxides shall continuously record data on a span that satisfies the requirements 40 CFR 60.47a.	Y	Installed and maintained. Reports are submitted quarterly.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide, Nitrogen oxides.	Condition A 9	Any exception to the above must be specifically authorized by the Department, in writing, and in accordance with state and federal regulations.	Y	"above" refers to CEM requirements in Condition II.A.9.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide, Nitrogen oxides.	Condition A 9 (a)	CEMS data shall be recorded and reported in accordance with Chapter 62-297, F.A.C., and 40 CFR 60.49a and 60.7. A record shall be kept for periods of startup, shutdown and malfunction	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide, Nitrogen oxides.	Condition A 9 (b)	A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment or of a process to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation, or any breakdown, shall not be considered malfunctions	N	Informational - Definition.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 9 (c)	The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of all CEMS	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 9 (d)	Opacity monitoring system data shall be reduced to 6-minute averages, based on 36 or more data points, and gaseous CEMS data shall be reduced to 1 hour averages, based on 4 or more data points, in accordance with 40 CFR 60.13(h)	Y	Standard Operating Procedures.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Boilers**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 9 (e)	For purposes of reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Specific Condition No. II.A.11., herein, which exceeds the applicable emission limit in Specific Condition No. II.A.3	N	Informational - Definition.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 9 (f)	The permittee is subject to all applicable provisions of Rule 62-4.130, F.A.C., Plant Operation-Problems. 62-4.130 Plant Operation - Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire or by any other cause, the permittee shall immediately notify the department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.	Y	Standard operating procedure.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 10	Operations Monitoring for each CFB	See Comment	Monitoring required as follows.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 10 (a)	Devices shall be installed to continuously monitor and record steam production and flue gas temperature at the exit of the control equipment	Y	CISCO DARS tracking system.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 10(b)	All coal and No.2 fuel oil usage shall be recorded on a 24 hour (daily) basis for each CFB	Y	CISCO DARS tracking system.

**Cedar Bay Cogeneration, Inc., Duval County Florida**  
**Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 10 (b)	Recycle rejects usage on a volumetric basis shall be estimated and recorded for each 24 hour period in which rejects are burned	Y	Fiber rejects handling system has not been used as of 6/1/98. Information would be recorded in CISCO DARS tracking system.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 11	Reporting for each CFB	See Comment	Reporting required as follows.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 11 (a) (40 CFR 60.8)	A minimum of thirty days prior written notification of compliance testing shall be given to the Department's N.E. District office and to the RESD office, in accordance with 40 CFR 60.8	Y	Standard Operating Procedure - Notification is submitted annually prior to testing.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 11 (b)	In accordance with Rule 62-297.570, F.A.C., the results of the compliance test shall be submitted within 45 days after completion of last run	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 11 (c)	The owner or operator shall submit excess emission reports to the RESD office, in accordance with Rule 62-210.700, F.A.C., and 40 CFR 60.7(c) and (d). The reports should include the following:	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 11 (c)(1)	The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each period of excess emissions (40 CFR 60.7(c)(1))	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 11 (c)(2)	Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted (40 CFR 60.7(c)(2))	Y	Standard Operating Procedures.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Boilers**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 11 (c)(3)	The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments (40 CFR 60.7(c)(3))	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 11 (c)(4)	When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report (40 CFR 60.7(c)(4))	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 11 (c)(5)	The owner or operator shall maintain a file of all measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and, all other information required by this permit recorded in a permanent form suitable for inspection (40 CFR 60.7(e))	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Opacity	Condition A 11 (d)	Annual and quarterly reports shall be submitted to the RESD office as per Rule 62-297.500, F.A.C.	Y	Standard Operating Procedures.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 12	Any change in the method of operation, fuels utilized, equipment, or operating hours or any other changes pursuant to Rule 62-212.200, F.A.C., defining modification, shall be submitted for approval; to the Department's Bureau of Air Regulation (BAR)	Y	Standard Operating Procedure.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No specific pollutant.	Condition A 13	All records of documentation shall be kept on file for a minimum of 3 years pursuant to Rule 17-4.160(4), F.A.C.	Y	Standard Operating Procedures.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Boilers**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
<b>Fluidized Bed Coal Fired Boilers (CFB)</b> <b>B1: Boiler A</b> <b>B2: Boiler B</b> <b>B3: Boiler C</b>	Opacity	Condition A 14	62-210.700 Excess Emissions.	Y	Excess emissions are properly reported.
			(1) Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.	Not Applicable	
			(2) Excess emissions from existing fossil fuel steam generators resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.	Not Applicable	
			(3) Excess emissions from existing fossil fuel steam generators resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed Number 3 of the Ringelmann Chart (60 percent opacity), and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized.	Y	
			A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.	Y	
			Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed by this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors.	Y	
			Particulate matter emissions shall not exceed an average of 0.3 lbs. per million BTU heat input during the 3-hour period of excess emissions allowed by this subparagraph.	Y	
			(4) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction	Y	



**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

<b>Boilers</b>					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No Specific pollutant.	Condition A 15	62-210.650 Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. Specific Authority: 403.061, F.S. Law Implemented: 403.021, 403.031, 403.061, 403.087, F.S. History: Formerly 17-2.240, Formerly 17-210.650.	Y	Per standard operating procedure, circumvention is not done.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No Specific pollutant.	Condition A 16	The permittee is subject to all applicable provisions of Rule 62-4.160, F.A.C., Permit Conditions	Y	This is an example of a rule being cited that has many requirements. The rule in its entirety has been attached to the cover letter dated March 21, 1995.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No Specific pollutant (VOC not limited by requirement).	Condition B 3	The VOC emissions, from the maximum No.2 fuel oil utilization rate of ... 8,000 gals/hr and 1,900,000 gals/yr for the three boilers, are not expected to be significant.	Y	Boiler meter reading; CISCO DARS tracking. Boilers used less than 1,079,200 gallons total in 1994. Hourly fuel usage limited by heat input as addressed by Condition A.1.(c). From AP-42, VOC from highest, Boiler C, calculates to 0.139 tons in 1994. Max. calculates to 0.245 tpy.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No Specific pollutant.	Condition C 4	Fuel shall not be burned in any CBCP unit unless the control devices are operating properly, pursuant to 40 CFR 60, Subpart Da	Y	Standard Operating Procedure. Distributed Control System (DCS) permissives prohibit operations without control system operating.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide.	Condition C 5	The maximum sulfur content of the No.2 fuel oil utilized in the CFBs and the two unit limestone/aragonite dryers shall not exceed 0.05%, by weight. Samples shall be taken of each fuel oil shipment received and shall be analyzed for sulfur content and heating value. Records of the analyses shall be kept a minimum of 3 years to be available for the Department and RESD inspection	Y	Standard Operating Procedure, Analysis.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide.	Condition C 6	Coal fired in the CFBs shall have a sulfur content not to exceed 1.7%, by weight, on a shipment (train load) basis. Coal sulfur content shall be determined and recorded in accordance with 40 CFR 60.47a	Y	Standard Operating Procedure, Analysis.

**Cedar Bay Cogenerati c., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Boilers**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	Sulfur dioxide.	Condition C 7	CBC shall maintain a daily log of the amounts and types of fuel used and copies of fuel analyses containing information on sulfur content and heating values	Y	Standard Operating Procedure, CISCO DARS tracking system, for boiler usage.
<b>Construction Requirements</b>					
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No Specific pollutant.	Condition A 1 (h)	No less than 90 days prior to completion of construction, CBCP shall submit a plan to the Department for conducting a 30 day test burn within one year after initial compliance testing. That test burn shall be designed to ascertain whether the CFBs can burn the rejects as supplemental fuel w/o exceeding any of the limitations on emissions and fuel usage contained in Specific Condition No. II.A. and w/o causing any operational problems which would affect the reliable operation (w/ customary maintenance) of the CFBs and w/o violating any other environmental requirements	Y	Reference consent order for OGC case number 98-0070.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No Specific pollutant.	Condition A 1 (h)	CBCP shall notify the Department (RESD) at least 30 days prior to initiation of the test burn	Y	Reference consent order for OGC case number 98-0070.
Fluidized Bed Coal Fired Boilers (CFB) B1: Boiler A B2: Boiler B B3: Boiler C	No Specific pollutant.	Condition A 1 (h)	The results of the test burn and CBCP's analysis shall be reported to the Department and to the RESD within 45 days of completion of the test burn. The Department shall notify CBCP within 30 days thereafter of its approval or disapproval of any conclusion by CBCP that the test burn demonstrated that the rejects can be burned in compliance with this condition	Y	Reference consent order for OGC case number 98-0070.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Material Handling General					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Material Handling General	No Specific pollutant.	Condition B 1	The material handling and treatment operations, including coal and limestone/argonite unloading buildings, coal and limestone/argonite reclaim hoppers, coal crusher house, fly and bed ash silos, ash pelletizer, pellet curing silo, coal and limestone/argonite day silos, conveyors, storage areas and related equipment, may be operated continuously (8760 hr/yr).	N	See Limestone Handling, Limestone Dryers.
Material Handling General	No Specific pollutant.	Condition B 2	Limits for material/usage rates for coal, limestone/argonite, fly ash and bed ash. (See Table 2)	Y	From data provided by Cedar Bay.
Material Handling General	Particulate, Opacity.	Condition B 4 (b)	Initial and subsequent compliance tests shall be conducted for VE and PM emissions using EPA Methods 9 and 5, respectively, in accordance with Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version)	Y	Will comply with methods.  Subsequent tests as required per Condition B5. Initial test requirements are OBSOLETE.
Material Handling General	Opacity.	Condition B 5	VE shall not exceed 5% opacity from any source in the material handling and treatment area listed in Specific Condition No. II.B.4., in accordance with Rule 62-296.711(2)(a), F.A.C.	Y	Listed sources in operation have passed tests.
Material Handling General	Particulate, Opacity.	Condition B 5	After the one-time PM mass emissions verification compliance tests have been performed, neither the Department nor the RESD will require a PM mass emissions test in accordance with EPA Method 5 unless the VE limit of 5% opacity is exceeded for a given source, or unless the Department or the RESD, based on other information, has reason to believe that the PM emission limits are being violated in accordance with Rule 62-297.620(4), F.A.C.	Y	No continuing requirements unless V.E. violation.
Material Handling General	Particulate, Opacity.	Condition B 6	All sources subject to VE and PM mass emissions performance tests shall conduct them concurrently, except where inclement weather interferes	Y	Standard Operating Procedure.

**Cedar Bay Cogeneration Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Material Handling General**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Material Handling General	Particulate, Opacity.	Condition B 9	Initial and annual PM emissions and VE compliance tests for all the emission points in the material handling and treatment area, including but not limited to the sources specified in this permit, shall be conducted in accordance with the July 1, 1992 version of 40 CFR 60, Appendix A, using EPA Methods 5 and 9, respectively.	Y	Will use EPA Method 9 specified Standard Test Procedures.  PROPOSED MODIFICATION: "Annual VE compliance tests for all the emission points in the material handling and treatment area, including but not limited to the sources specified in this permit, shall be conducted in accordance with the July 1, 1992 version of 40 CFR 60, Appendix A, using EPA Method 9."  Initial test requirement is OBSOLETE. Wording is confusing. Reference to "annual PM emissions...tests" appears to CONFLICT with Condition B5, which refers to "one-time PM mass emissions verification compliance tests."
Material Handling General	Particulate, Opacity.	Condition C 3	CBCP is subject to applicable provisions of Rule 62-296.310(3), F.A.C., Unconfined Emissions of Particulate Matter	Y	Particulate matter is controlled by wet suppression, where applicable.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Coal Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
C1: Coal Crusher Dust Collector	Particulate, Opacity.	Condition B 4 (a)	Coal Crusher Building - Baghouse Operation Required	Y	Pressure Drop of Baghouse + Initial Test.
C2: Coal Silo Dust Collector	Particulate, Opacity	Condition B 4 (a)	Coal Silo Conveyor - Baghouse Operation Required	Y	Pressure Drop of Baghouse + Initial Test.
C1: Coal Crusher Dust Collector  C2: Coal Silo Dust Collector	Particulate, Opacity.	Condition B 4 (a)	The emissions from the above listed sources are subject to the PM emission limitation requirement of 0.003 gr/dscf (applicant requested limitation which is more stringent than what is allowed by Rule 62.296.711, F.A.C.). Since these sources are RACT standard type, then a one-time verification test on each source shall be required for PM mass emissions to demonstrate that the baghouse control systems can achieve the 0.003 gr/dscf.	Y	Passed compliance tests. "Above" refers to sources in the "Source" column in this table.
C1: Coal Crusher Dust Collector  C2: Coal Silo Dust Collector	Particulate, Opacity.	Condition B 4 (a)	The above mentioned performance tests shall be conducted using EPA Method 5 pursuant to Rule 62-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version)	Y	Used EPA methods specified.
CF1: Coal Unloading Building Water Spray  CF2: Coal Feeders	Particulate, Opacity.	Condition B 4 (c)	The PM emissions from the following material handling and transport sources shall be controlled by wet suppression using continuous water sprays during unloading: 62-1986-310(3)	Y	Water spray used.
CF1: Coal Unloading Building Water Spray  CF2: Coal Feeders	Particulate, Opacity.	Condition B 4 (b)	The above listed sources are subject to a VE emission limitation requirement of 5% opacity, in accordance with Rule 62-296.711, F.A.C., using Method 9 or other FDEP approved methods in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A, July 1992.	Y	Method 9.

**Cedar Bay Cogeneration Co., Duval County Florida**  
**Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Limestone (Aragonite) Handling**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
ADS Trains = LA1, LB1: Aragonite Dryer/Pulverizer Fabric Filters (1 BMC- FLT-1A and -1B)	No Specific pollutant.	Condition B 1	The two ADS trains may be operated in any combination for a maximum of 22 train-hours per day (maximum of 8,030 train-hours per year) at maximum capacity.	Y	Operating logs.
ADS Trains	No specific pollutant. VOC emissions not limited by condition.	Condition B 3	The VOC emissions, from the maximum No.2 fuel oil utilization rate of 240 gals/hr and 700,800 gals/yr for the limestone/aragonite dryers..., are not expected to be significant.	Y	PROPOSE to reword as "The Maximum No. 2 fuel oil utilization rate for the ADS trains is 240 gals/hr and 700,800 gals/yr."  Dryer meter readings. Dryer VOC emissions are calculated by AP-42 estimation methods, since testing is not currently required.
ADS Trains	Particulate.	Condition B 4 (a)	The two ADS Trains require a baghouse or fabric filter.	Y	Pressure Drop of Baghouse + Initial Test.
LA2: Aragonite Hopper 1 Vent Filter  LB2: Aragonite Hopper 2 Vent Filter	Particulate.	Condition B 4 (a)	The two ADS Storage Bins require a baghouse or fabric filter.	Y	Pressure Drop of Baghouse + Initial Test.
ADS Trains  LA2: Limestone Hopper 1 Vent Filter  LB2: Limestone Hopper 2 Vent Filter	Particulate.	Condition B 4 (a)	The emissions from the above listed sources are subject to the PM emission limitation requirement of 0.003 gr/dscf (applicant requested limitation which is more stringent than what is allowed by Rule 62.296.711, F.A.C.). Since these sources are RACT standard type, then a one-time verification test on each source shall be required for PM mass emissions to demonstrate that the baghouse control systems can achieve the 0.003 gr/dscf.	Y	Passed compliance tests. "Above" refers to sources in the "Source" column in this table.  Initial one time test is OBSOLETE.
ADS Trains  LA2: Limestone Hopper 1 Vent Filter  LB2: Limestone Hopper 2 Vent Filter	Particulate.	Condition B 4 (a)	The above mentioned performance tests shall be conducted using EPA Method 5 pursuant to Rule 62-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version)	Y	Used EPA methods specified.  OBSOLETE.
ADS Trains	No Specific pollutant.	Condition B 7	Maximum emissions from each of the ADS trains, while using oil, shall not exceed the following (based on AP-42 factors, Table 1, 3-1, Industrial Distillate, 10/86): (See Table 3)	Y	PM10-Test Data; SO <sub>2</sub> , CO, NO <sub>x</sub> , VOC Calculated from fuel usage rate, using AP-42 reference cited.
ADS Trains	Sulfur dioxide	Condition B 8 (a)	The maximum sulfur content of No.2 fuel oil shall not exceed 0.05%, by weight.	Y	Analyses of fuel oil and specification.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Limestone (Aragonite) Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
ADS Trains	No Specific pollutant.	Condition B 8 (b)	The maximum firing rate of No.2 fuel oil for each limestone dryer shall not exceed 120 gals/hr, or 350,400 gals/yr. This reflects a combined total fuel oil firing rate of 240 gals/hr., and 700,800 gals/yr, for the two dryers.	Y	Metered.
ADS Trains	Sulfur dioxide	Condition C 7	CBC shall maintain a daily log of the amounts and types of fuel used and copies of fuel analyses containing information on sulfur content and heating values	Y	Limestone dryer fuel oil meter readings not recorded daily in 1994; meters installed May 17, 1994; missing data has been calculated for each day in 1994. Meters are now recorded daily.
ADS Trains	Particulate	Condition B 12	The maximum material feed rate to each ADS train shall not exceed 42.6 tons per hour and the volumetric flow rate shall not exceed 42,100 dry standard cubic feet per minute per ADS train.	Y	Operating records and test data.
ADS Trains	Particulate	Condition B 13	Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 100 percent of the test load until a new test is conducted. unit is so limited, then operation at higher capacity is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.	Y	Test data: B dryer 1/26/1998; 4/23-24/1996 A dryer 3/11/1994; 4/23-24/1996  Met 100% capacity criterion.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Ash Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
		Condition B 4	Material handling sources shall be regulated as follows:		
		Condition B 4 (a)	The material handling and treatment area sources with either fabric filter or baghouse controls are as follows:		
A1: Bed Ash Storage Hopper Vent Filter w/Fan	Particulate, Opacity.	Condition B 4 (a)	Bed Ash Hopper	Y	Pressure Drop of Baghouse + Initial Test.
A2: Bed Ash Silo Collector (Vents through ash mechanical exhausts.)  A3: Bed Ash Silo Vent Filter (Controls truck loadout, rail loadout & silo transfers.)	Particulate, Opacity.	Condition B 4 (a)	Bed Ash Silo	Y	Separator + Dry cyclone w/ Baghouse vent (2 baghouses).
A15: RR Pellet Load Out Dust Filter	Particulate, Opacity.	Condition B 4 (a)	Rail Loadout Surge Hopper	Y	Pressure Drop of Baghouse + Initial Test.
A13: Curing Silo Impingement Scrubber	Particulate, Opacity.	Condition B 4 (a)	Pellet Stock Conveyor	Y	Pressure Drop of Baghouse + Initial Test.
A4: Fly Ash Collector (Vents through ash mechanical exhausts) (1 ASA-CO-1A)  A5: Fly Ash Collector (Vents through ash mechanical exhausts) (1 ASA-CO-1B)  A6: Fly Ash Silo Vent Filter (Controls truck load out, rail loadout & silo) (1 ASA-FLT-2)	Particulate, Opacity.	Condition B 4 (a)	Fly Ash Silo	Y	Separator + Dry cyclone w/ Baghouse vent (2 baghouses).
A7: Bed Ash Pelletizer Receiver Vent Filter (1 ASA-FLT-2)	Particulate, Opacity.	Condition B 4 (a)	Bed Ash Receiver	Y	Pressure Drop of Baghouse + Initial Test.
A8: Fly Ash Receiver Vent Filter (1 ASF-FLT-1)	Particulate, Opacity.	Condition B 4 (a)	Fly Ash Receiver	Y	Pressure Drop of Baghouse + Initial Test.
A17: Pellet Screen Dust Filter (1 ASF-DCO-1)	Particulate, Opacity.	Condition B 4 (a)	Pellet Vibratory Screen	Y	Pressure Drop of Baghouse + Initial Test.
A10: Recycle Tank Dust Filter (1 ASF-DCO-2)	Particulate, Opacity.	Condition B 4 (a)	Pelletizing Ash Recycle Tank	Y	Pressure Drop of Baghouse + Initial Test.



**Cedar Bay Cogeneration, Inc., Duval County Florida**  
**Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Ash Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
A9, AF11: Recycle Surge Hopper Filter (500 cfm) (1 ASF-FLT-3)	Particulate, Opacity.	Condition B 4 (a)	Pelletizing Recycle Hopper	Y	Pressure Drop of Baghouse + Initial Test
A14: Curing Silo Dust Filter (1 ASF-DCO-4)	Particulate, Opacity.	Condition B 4 (a)	Cured Pellet Recycle Conveyor	Y	Pressure Drop of Baghouse + Initial Test.
A16: Pellet Recycle Belt Head Pulley to Bucket Elevator Dust Filter (1 ASF-DCO-5)	Particulate, Opacity.	Condition B 4 (a)	Pellet Recycle Conveyor	Y	Pressure Drop of Baghouse + Initial Test.
A18: Dry Ash Railcar Loadout	Particulate	Condition B 4 (a)	Dry Ash Loadout System	Y	Pressure Drop of Baghouse + Initial Test.
A7-A17: Ash Pelletizer System  A18: Dry Ash Loadout System	Particulate	Condition B 4 (a)	The Dry Ash Loadout System and the Pelletizer System shall not be operated simultaneously	Y	Operating Records. Condition added per PSD-FL-137(C).

Cedar Bay Cogeneration, Inc., Duval County Florida  
 Facility and Source Specific Regulatory Applicability and Compliance Evaluation

Ash Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
A1: Bed Ash Storage Hopper Vent Fan (1 ASA-FLT-1) A2: Bed Ash Silo Collector (1 ASA-CO-2) A3: Bed Ash Silo Vent Filter (1 ASA-FLT-3) A4: Fly Ash Collector (1 ASA-CO-1A) A5: Fly Ash Collector (1 ASA-CO-1B) A6: Fly Ash Silo Vent Filter (1 ASA-FLT-2) A7: Bed Ash Pelletizer Receiver Vent Filter (1 ASF-FLT-2) A8: Fly Ash Receiver Vent Filter (1 ASF-FLT-1) A9(AF11): Recycle Surge Hopper (1 ASF-FLT-3) A10: Recycle Tank Dust Filter (1 ASF-DCO-2) A14: Curing Silo Dust Filter (1 ASF-DCO-4) A15: RR Pellet Load Out Dust Filter (1 ASF-DCO-3) A16: Pellet Recycle Belt II. Pulley to B. Elevator Dust Filter (1 ASF-DCO-5) A17: Pellet Screen Dust Filter (1 ASF-DCO-1) A18: Dry Ash Railcar Loadout	Particulate, Opacity.	Condition B 4 (a)	The emissions from the above listed sources are subject to the PM emission limitation requirement of 0.003 gr/dscf (applicant requested limitation which is more stringent than what is allowed by Rule 62.296.711, F.A.C.). Since these sources are RACT standard type, then a one-time verification test on each source shall be required for PM mass emissions to demonstrate that the baghouse control systems can achieve the 0.003 gr/dscf.	Y	Compliance Tests conducted. Sources are those listed in the Source column of this sheet.  One-time tests are OBSOLETE.

**Cedar Bay Cogeneration Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Ash Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
A1: Bed Ash Storage Hopper Vent Fan (1 ASA-FLT-1) A2: Bed Ash Silo Collector (1 ASA-CO-2) A3: Bed Ash Silo Vent Filter (1 ASA-FLT-3) A4: Fly Ash Collector (1 ASA-CO-1A) A5: Fly Ash Collector (1 ASA-CO-1B) A6: Fly Ash Silo Vent Filter (1 ASA-FLT-2) A7: Bed Ash Pelletizer Receiver Vent Filter (1 ASF-FLT-2) A8: Fly Ash Receiver Vent Filter (1 ASF-FLT-1) A9(AF11): Recycle Surge Hopper (1 ASF-FLT-3) A10: Recycle Tank Dust Filter (1 ASF-DCO-2) A14: Curing Silo Dust Filter (1 ASF-DCO-4) A15: RR Pellet Load Out Dust Filter (1 ASF-DCO-3) A16: Pellet Recycle Belt H. Pulley to B. Elevator Dust Filter (1 ASF-DCO-5) A17: Pellet Screen Dust Filter (1 ASF-DCO-1) A18: Dry Ash Railcar Loadout	Particulate, Opacity.	Condition B 4 (a)	The above mentioned performance tests shall be conducted using EPA Method 5 pursuant to Rule 62-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version)	Y	Used EPA methods specified. Passed compliance tests. "Above" refers to sources in the "Source" column in this table.  One-time tests are OBSOLETE.

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Ash Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
A11: Hydrator Venturi Scrubber (1 ASF-SCB-1)  A12: Pan Impingement Scrubber (1 ASF-SCB-2)  A13: Curing Silo Impingement Scrubber (1 ASF-SCB-3)	Particulate, Opacity.	Condition B 4 (b)	The PM emissions from the following process and/or equipment, in the material handling and treatment area sources, shall be controlled using wet suppression/removal techniques:		
A11: Hydrator Venturi Scrubber (1 ASF-SCB-1)	Particulate, Opacity.	Condition B 4 (b)	Ash Pellet Hydrator	Y	Venturi Scrubber - Pressure Drop & Water flow.
A12: Pan Impingement Scrubber (1 ASF-SCB-2)	Particulate, Opacity.	Condition B 4 (b)	Ash Pelletizing Pan	Y	Impingement Scrubber.
A13: Curing Silo Impingement Scrubber (1 ASF-SCB-3)	Particulate, Opacity.	Condition B 4 (b)	Ash Pellet Curing Silo	Y	Impingement Scrubber.
A11: Hydrator Venturi Scrubber (1 ASF-SCB-1)  A12: Pan Impingement Scrubber (1 ASF-SCB-2)  A13: Curing Silo Impingement Scrubber (1 ASF-SCB-3)	Particulate, Opacity.	Condition B 4 (b)	The above listed sources are subject to a VE and a PM emissions limitation requirement of 5% opacity and 0.01 gr/dscf (applicant requested limitation which is more stringent than what is allowed by rule), respectively, in accordance with Rule 62-296.711, F.A.C.	Y	Passed tests, Methods 9 and 5.
A18: Dry Ash Rail Car Loadout	Particulate, Opacity.	Condition B 4 (c)	Fugitive emissions...shall be controlled as follows: Using closed or covered containers under negative air pressure during ash loadout; and using water sprays prior to removal of rail car loadout cap when loading open rail cars.	Y	Covers, vacuum, and water used.
A18: Dry Ash Rail Car Loadout	Particulate, Opacity.	Condition B 4 (b)	The above listed sources are subject to a VE emission limitation requirement of 5% opacity, in accordance with Rule 62-296.711, F.A.C., using Method 9 or other FDEP approved methods in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A, July 1992.	Y	Method 9.

**Cedar Bay Cogeneration Co., Duval County Florida**  
**Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

Ash Handling					
Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments

Cedar Bay Cogeneration Co., Duval County Florida  
 Facility and Source Specific Regulatory Applicability and Compliance Evaluation

Seminole Kraft Corporation Requirements

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Seminole Kraft Corporation	No specific pollutant.	D. Contemporaneous Emission Reductions	The following SKC sources shall be permanently shut down and made incapable of operation, and shall turn in their operation permits to the Department's BAR, within 30 days of written confirmation by the Department of the successful completion of the initial compliance tests on the CBCP boilers:	Y	Letter received Aug 10, 1994 from R. Pace to J.L. West indicates approval of surrender of permits effective July 22, 1994. An inspection was made at Seminole Kraft March 24, 1995 for verification. Parts were removed, except stacks, which were to have been removed by June 30, 1995. "Seminole Kraft has fulfilled the requirements set forth in the operating agreement."  <b>OBSOLETE.</b>
Seminole Kraft Corporation	No specific pollutant.		The No.1 PB (power boiler)	Y	See above comment. <b>OBSOLETE.</b>
Seminole Kraft Corporation	No specific pollutant.		The No.2 PB	Y	See above comment. <b>OBSOLETE.</b>
Seminole Kraft Corporation	No specific pollutant.		The No.3 PB	Y	See above comment. <b>OBSOLETE.</b>
Seminole Kraft Corporation	No specific pollutant.		The No.1 BB (bark boiler)	Y	See above comment. <b>OBSOLETE.</b>
Seminole Kraft Corporation	No specific pollutant.		The No.2 BB	Y	See above comment. <b>OBSOLETE.</b>
Seminole Kraft Corporation	No specific pollutant.		The RESD office shall be specifically informed in writing within 30 days after each individual shut down of the above referenced equipment. This requirement shall operate as a joint and individual requirement to assure common control for purpose of ensuring that all commitments relied on are in fact fulfilled	Y	See above comment. <b>OBSOLETE.</b>

Cedar Bay Cogeneration, Inc., Duval County Florida  
 Facility and Source Specific Regulatory Applicability and Compliance Evaluation

Seminole Kraft Corporation Requirements

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
Seminole Kraft Corporation	No specific pollutant	PA 88-24A Condition II. D.	<p><i>Within one year of surrender of operating permits as provided above, SK shall have completed the following steps to ensure compliance with this condition</i></p> <ul style="list-style-type: none"> <li><i>Remove all oil guns</i></li> <li><i>Remove motors and selected conveyor parts in wood feed system for bark boilers</i></li> <li><i>Dismantle stacks</i></li> <li><i>Disconnect boiler feedwater pumps</i></li> <li><i>Sever fuel line connections</i></li> <li><i>Remove fan motors</i></li> </ul> <p><i>These sources shall not, under any circumstances, be restarted, refurbished or re-permitted as new or existing sources, at the SK or CBCP site.</i></p>	Y	<p><i>Since this is stated as being both a joint and individual requirement, CBCP should confirm with SKC that shut down has occurred and operation permits have been surrendered.</i></p> <p><b>OBSOLETE</b></p>
Seminole Kraft Corporation	No specific pollutant	PA 88-24A Condition II. E. 1.	<p><i>This certification and any individual air permits issued by the Department subsequent to the final order of the Board certifying the power plant site under Section 403.509, F.S., shall incorporate the following limitations on the total tonnage of the specified criteria pollutants allowed to be emitted annually by any natural gas-fired boiler or combination of boilers constructed and operated by SK to provide up to 375,000 lbs/hr of steam for use in its recycled paper process:</i></p> <ul style="list-style-type: none"> <li><i>Tons Per Year</i></li> <li><i>CO 553</i></li> <li><i>NO<sub>x</sub> 310</i></li> <li><i>SO<sub>2</sub> 25, except as provided in (2) below</i></li> </ul>	Y	<p><i>This condition applies to permitting activities subsequent to the issuance of PA 88-24A.</i></p> <p><i>Compliance with this condition is the responsibility of Seminole-Kraft Corporation.</i></p>

**Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation**

**Seminole Kraft Corporation Requirements**

Source	Regulated Pollutant	Potentially Applicable Requirements	Description of Requirement	Contains Federally Enforceable Requirement ?	Comments
<b>Seminole Kraft Corporation</b>	No specific pollutant	PA 88-24A Condition II. E. 2.	<i>In the event that the ceiling for SO<sub>2</sub> is expected to be exceeded due to unavailability of natural gas caused by factors beyond the control of SK, SK may notify the Department that it must exceed the ceiling as provided herein; and emissions of SO<sub>2</sub> during the period of such curtailment shall not be counted against the yearly emissions ceiling of 25 tons unless administrative proceedings result in a finding that the exceedance was within Seminole Kraft's control. In no event shall the annual emissions of SO<sub>2</sub> from the steam boilers referenced above exceed a ceiling of 41 tons per year.</i>	Y	<i>Compliance with this condition is the responsibility of Seminole-Kraft Corporation.</i>
<b>Seminole Kraft Corporation</b>	No specific pollutant	PA 88-24A Condition II. E. 3.	<i>The notice shall include a statement or reasons for the request and supporting documentation, and shall be published by SK, without supporting documents, in a newspaper of general circulation in Jacksonville, as defined in Section 403.5115(2), F.S. The filing and publication of the notice no later than 7 days following the date of exceedance, shall preclude any finding of violation by DEP until final disposition of any administrative proceedings.</i>	Y	<i>Compliance with this condition is the responsibility of Seminole-Kraft Corporation.</i>



Cedar Bay Cogenerati~~on~~ ac., Duval County Florida  
 Facility and Source Specific Regulatory Applicability and Compliance Evaluation

TABLE 1  
 Boiler Emission Limitations

Pollutant	lbs/MMBtu	lbs/hr	TPY	TPY for 3 CFBs
CO	0.175 <sup>1</sup>	186 <sup>1</sup>	758	2,273
NO <sub>x</sub>	0.17 <sup>2</sup>	180.7 <sup>2</sup>	736.1	2,208
SO <sub>2</sub>	0.24 <sup>3</sup>	255.1 <sup>3</sup>	---	---
SO <sub>2</sub>	0.20 <sup>4</sup>	---	866	2,598
VOC	0.015	16.0	65	195
PM/PM <sub>10</sub>	0.018	19.1	78	234
H <sub>2</sub> SO <sub>4</sub> mist	4.66E-04	0.50	2.0	6.1
Fluorides	7.44E-04	0.79	3.2	9.7
Lead	6.03E-05	0.06	0.26	0.78
Mercury	2.89E-05	0.03	0.13	0.38
Beryllium	8.70E-06	0.01	0.04	0.11

<sup>1</sup> (8-hour rolling average)  
<sup>2</sup> (30-day rolling average)  
<sup>3</sup> (3-hour rolling average)  
<sup>4</sup> (12-month rolling average)

Cedar Bay Cogeneration, Inc., Duval County Florida  
Facility and Source Specific Regulatory Applicability and Compliance Evaluation

TABLE 2

Limits for Material/Usage Rates for Coal,  
Limestone/Aragonite, Fly Ash and Bed Ash

Material	Rate	
	Tons Per Month (TPM)	Tons Per Year (TPY)
Coal	117,000	1,170,000
Limestone	27,000	320,000
Fly Ash	28,000	326,000
Bed Ash	8,000	88,000

Cedar Bay Cogeneration, Inc., Duval County Florida  
 Facility and Source Specific Regulatory Applicability and Compliance Evaluation

TABLE 3

Emissions Limits from ADS

Pollutant	Lbs/Hr Dryers	TPY	TPY for 2 Pulverizers/Conveyors
PM/PM <sub>10</sub>	1.08*	2.18	4.35
SO <sub>2</sub>	0.85	1.15	2.3
CO	0.60	0.81	1.62
NO <sub>x</sub>	2.40	3.25	6.5
VOC	0.05	0.06	0.12
*This value is derived from the design volumetric flow rate limit of 42,100 dscfm, the emission limit in condition B.4.a of 0.003 gr./dscf, and the hours of operation limit in condition B.1 of 8030 hours per year.			