Indiantown Cogeneration, L.P. P.O. Box 1799 13303 SW Silver Fox Lane Indiantown, FL 34956

772.597.6500 Fax: 772.597.6210

RECEIVED

OCT 14 2009

BUREAU OF AIR REGULATION

October 13, 2009

Jeff Koerner DEP Bureau of Air Regulation MS 5500 2600 Blair Stone Rd Tallahassee, FL 32399-2400

Subject: Indiantown Cogeneration, LP Permit PSD-FL-168, 0850102

Dear Mr. Koerner,

This letter informs you that Indiantown Cogeneration, LP, is performing a replacement-in-kind project at our the existing Indiantown Cogeneration Plant, which is located in Martin County at 13303 SW Silver Fox Lane in Indiantown, Florida. We will be replacing a feedwater heater with like equipment during our outage scheduled for October 24 thru November 6, 2009.

This replacement is specifically excluded from the definitions of modification and major modification in 62 F.A.C. 204.200(24)(a) and 210.200(192)(c), both of which state "A physical change or change in the method of operation shall not include... routine maintenance, repair, or replacement." Similarly, the project does not meet the definition of reconstruction in 62 F.A.C. 210.200(259), because the fixed capital cost of the new components do not exceed 50 percent of the fixed capital cost that would be required to construct a comparable entirely new emissions unit.

Therefore, the equipment replacement does not trigger construction permitting under 62-4. and does not trigger Prevention of Significant Deterioration (PSD) permitting under 62-212.400.

Regarding New Source Performance Standards, a modification is defined in 40 CFR 60.14(a) as "...any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 111 of the Act." The regulation further states at 40 CFR 60.14(h): "No physical change, or change in the method of operation, at an existing electric utility steam generating unit shall be treated as a modification for the purposes of this section provided that such change does not increase the maximum hourly emissions of any pollutant regulated under this section above the maximum hourly emissions achievable at that unit during the 5 years prior to the change." We do not believe replacing the feedwater heater will increase the emission rate of any pollutant regulated under NSPS Subpart Da, and therefore the project is not a modification under the federal New Source Performance Standards.

Specifications for the old and new feedwater heater are attached for your information.

No permitting action is required. If you have any questions, please contact Nicholas Laryea at 772-597-6500 extension 19.

Sincerely,

Gary E. Willer General Manager

Cc: Lennon Anderson, Southeast District Air Management Program, Lauren Billheimer, Cogentrix Energy

Hao Duong, Indiantown Cogeneration L.P.

A.J. Jablonowski, Epsilon Associates

File # 2.5.2

Day E. Wille

Y U B A H E A T T R A N S F E R
P.O. BOX 3158, TULSA, OK 74101-3158 PHONE (918) 234-6000 FAX (918) 234-3345 WWW.

FAX (918) 234-3345 WWW. YUBA.COM

NEW HEATER

## FEEDWATER HEATER SPECIFICATION SHEET

AS BUILT

		AS BUILT										
	CUSTOMER: COGENTRIX ENERGY, INC DATE: 08/12/2009											
		INQ.NO:										
	ADDRESS:	OMER ORDER NO:										
	PLANT LOCATION:	INDIANTOWN CO	GENERATION I	PAC.	PROP. NO.: QH-6554-09							
			JOB 1	JOB NO: 09-H-431-1								
1	SERVICE OF UNIT	I TEM:										
2	SIZE: 62-385	TYPE: U-T	JBE		ENGR: AD							
3	<del> </del>			<del> </del>								
4							ION: HORIZONTAL					
•												
	PERFORMANCE OF ONE SHELL											
	SHELL SIDE TUBE SIDE											
5	FLUID CIRCULATED	)	STEAM	STEAM		FEEDWATER						
6	TOTAL FLUID ENTE	ERING LB/	IR 104,02	1	397,754	2,521,231						
7	INLET ENTHALPY	INLET ENTHALPY BTU/LB		1320.4		250.4						
8	OUTLET ENTHALPY	OUTLET ENTHALPY BTU/LB				302.5						
9	INLET TEMPERATUR	F 581	259.8 581 (331.0 SAT)			280.4						
10	<del> </del>	~	F	290.4		331.0						
11	OPERATING PRESSU	RE PS:	[A]	104.5	<del></del>	***************************************						
12												
13	NUMBER OF PASSES	NUMBER OF PASSES			SUBCL	2						
14	VELOCITY	FT/SEC	_	<u></u>		<del> </del>	6.0 @ SG =1					
15	PRESSURE DROP	PS	I DESUP	0.9 SU	BCL 3.1	1	8.3					
		HEAT				TE BAFFLE	REF					
		TRANSFERRED	SURFACE	LMTD	BTU/HR/		TEMPERATURE					
		BTU/HR	SQ. FT	°F	SQ. FT /°		DIFFERENCE					
16	DESUPERHEATING	10,052,000	1146	139.6	63	12.625	°F					
17		100,437,000	8,963	15.1	742		TTD 0.0					
18	DRAIN COOLING	20,763,000	1895	22.3	491	7.625	DCA 10.0					
		CONSTRUCTIONEACH SHELL										
	SHELLSIDE TUBESIDE											
19	DESIGN PRESSURE		135 & FULL VAC			610						
20	TEST PRESSURE	PSIG		180			795					
21	DESIGN TEMPERATU	RE °F S	HELL 400	2	KIRT 650	3	60					
22	MINIMUM DESIGN M	ETAL TEMP. (° E	) SHELLS		80.		80.					
23	TUBES SA-688-TP3	304 (.05MC) NO	.U's 1125		8" .035" 2		32'- 1" STR					
24	SHELL SA-516-70		ID: 62	TUBE PI								
25	SHELL COVER		ELDED TO SHEL			SA-516-70						
26	· · · · · ·	SA-516-70		CHANNEL		SA-516-70						
	TUBE SHEET	SA-350 LF2	CLASS 1		MENT PLATE	SA-240-30	)4					
28	SUPPORT PLATES	STEEL		ZONE BA		STEEL						
29	SHROUDS-DSH	STEEL WET	חצים	SUBCOOL TUBE SI		STEEL	. <del>.</del>					
30 31	TYPE JOINTS-SHELI GASKETS-SHELL	SIDE WEL	 UBU	CHANNEL		ELLIPTICA W / MANWA						
32	CONNECTIONS: STEA	M INTET 1	6" W.E.		AINS INLET	10"	W.E.					
33			4" W.E.		ERGENCY DRN	14"	W.E.					
34		ER INLET 10			TLET	16"	W.E.					
35	CODE REQUIREMENTS											
36	WEIGHTS (LB) SHE				<del></del>	LL OF WATER	96,200					
37	SHELL SAFETY VALV				RELIEF VALVE							
38	SHELL GAUGE GLASS											
39	REMARKS: Tubes			sheet.								
40		Shell Roller Supports Provided										
41		11 Installed spare tubes included, not counted as effective surface										
42	Two shell cut band provided to reduce shellremoval distance.											
43												
44	REV 1 BY PV ADDED MATERIALS IN LINE 24,25,26,27 AND 43											
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## (918) 234-6000

## FEEDWATER HEATER SPECIFICATION SHEET

	FE	SEDWAIER DEM	TER SPECI	.r icaii	ON SHEET			"AS BUILT"				
	CUSTOMER BECHTEL POWER CORPORATION DATE 10/20/92(AB 4/16/93											
	CUST. INO. NO. 22019											
	ADDRESS CUST. ORDER NO.											
•	PLANT LOCATION INDIANTOWN COGENERATION FACILITY PROP. NO. 0H-2916-92											
	JOB NO. 93-H-199-5											
1	SERVICE OF UNIT INTERMEDIATE PRESSURE HEATER 5 ITEM NO. EH-5											
2	SIZE 72-221	TYPE U-TUBE			ENGRS.							
3	SURFACE PER SHE			19 SO.FT	. TOTAL		4.676	50.FT				
4	NO. OF SHELLS PER UNIT 1 NO. OF UNITS 1 POSITION HORIZONTAL											
	PERFORMANCE OF ONE SHELL											
	SHELL SIDE TUBE SIDE											
<b></b> , 5	FLUID CIRCULATE	0	STEAM DRAINS			FEEDWATER						
6	TOTAL FLUID ENT		104.021 397.754			2,521,231						
7	INLET ENTHALPY	1320.40 312.5			250.4							
8	<b>OUTLET ENTHALPY</b>	259.9			302.5							
9	INLET TEMPERATU	582.3 (331.0 SAT.)			280.4							
10	OUTLET TEMPERATE	290.4			331.0							
11	OPERATING PRESSI	JRE PSIA		104.5								
12	AUBIDER AR SASSE			<u> </u>			~ <del>~~</del>					
13	NUMBER OF PASSES		CON	DSH.	& DC	TWO 3.00 AT 60 F						
14	VELOCITY DESCRIPTION	FT/SEC	DCU 1 1	DC /				11 60 1				
15	PRESSURE DROP		DSH 1.1	DC 1	2.7	ATE	2.3	Dafavara				
		HEAT Exchanged	SURFACE	LMTD	HT.TRAN.R	AIL	BAFF.	Reference				
		BTU/HR	SO.FT.	rů in	BTU/HR/ SO.FT/	_	DATTCH!	Temp. Difference				
16	DESUPERHEATING	10,935,000	1398	126.5	62	<del>'</del>	<u>raivii</u>	F				
17	CONDENSING	99,632,000	10679	15.3	610			TTD 0.0				
18	DRAIN COOLING	20,682,000	2242	22.2	416			DCA 10.0				
			RUCTION - E	ACH SHEL	1							
	- <del></del>	<del></del>			1		Tuba C	ido				
19	DESIGN PRESSURE	PSI	Shell Side			Tube Side 610						
20	TEST PRESSURE	PŞĪ	CODE				915					
21	DESIGN TEMPERATU	IRF F	SHELL 400		SKIRT 650 360							
22	TUBES SA-688-304			5/8" OD	20 AVG	LEN	GTH 1					
	SHELL	STEEL		72" ID	PITCH		3/16"					
24	SHELL COVER	STEEL-WELDE	D TO STEEL	SHELL S	KIRT	STEE	L					
25	CHANNEL (SR)	STEEL		CHANNEL		STEE						
26	TUBE SHEET	STEEL			MENT PLAT			SS STEEL				
27	SUPPORT PLATES	STEEL		ZONE BA			TEEL					
28	SHROUDS-DSH	L CIDE WELDED		DC C	STEE	L PTIC	AI					
29 30	TYPE JOINTS-SHEL GASKETS-SHELL	T 21NE METDED		TUBE SI CHANNEL								
31			DRATNS-									
32	CONNECTIONS: STEAM-INLET 16" DRAINS-INLET 10" SERIES W.E.  DRAINS-OUTLET 14"+ 14" EMERGENCY DUMP SERIES W.E.											
33	FEEDWATER-INLET 16" OUTLET 16" SERIES W.E.											
34	CODE REQUIREMENTS: ASME 1992 SECTION VIII, DIVISION 1											
35	WEIGHTS-SHELL AND BUNDLE 55,700 BUNDLE 44,600 FULL OF WATER 94,300											
36	SHELL SAFETY VALVE CONSOLIDATED TUBE SIDE RELIEF VALVE CONSOLIDATED											
37	SHELL GAUGE GLASS BY PURCHASER											
38	REMARKS: TUBES ROLLED INTO TUBESHEET.											
39	SHELL ROLLERS PROVIDED. M.D.M.J. 80 DEG. F.											
40	MINIMUM HYDROTEST TEMPERATURE 60 DEG. F.											
42	FILITION BIDN	ALEGI ITH FOU	ONL SO DEC	<del></del>								
43												

