



Department of Environmental Protection

Mulberry Cogen
Polk Power
AC 53-211670
PSDFL-187

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August 3, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William R. Malenius
Polk Power Partners
23293 South Pointe Drive
Laguna Hills, CA 92653

Dear Mr. Malenius:

Re: Amendment to Construction Permit
AC53-211670 (PSD-FL-187)
Custom Fuel Monitoring Schedule
Mulberry Cogeneration Project

This is in response to your March 7, 1994, letter, requesting a Custom Fuel Monitoring Schedule for sulfur at the subject facility. The permit amendment fee was received on June 28, 1994. The facility is required to comply with Section 60.334(b) of Subpart GG of the New Source Performance Standards, which states that sources may apply for a custom fuel monitoring schedule. Therefore, the permit specific conditions are amended as follows:

New Specific Condition No. 10

A custom fuel monitoring schedule shall be followed for natural gas fired at this facility, as follows:

Custom Fuel Monitoring Schedule for Natural Gas

1. Monitoring of fuel nitrogen content shall not be required since natural gas is the only fuel being fired in the gas turbines.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).
 - b. This custom fuel monitoring schedule shall become effective on the date this permit becomes valid. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. William R. Malenius
Polk Power Partners
Page Two

indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters. If monitoring data is provided by the applicant which demonstrates consistent compliance with the requirements herein, the applicant may begin monitoring as per the requirements of 2(c).

- c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
 - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
 4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

Attachments to be Incorporated

KBN letter received March 9, 1994.
(Permit Amendment Fee Received June 28, 1994)

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this

Mr. William R. Malenius
Polk Power Partners
Page Three

amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Mr. William R. Malenius
Polk Power Partners
Page Four

This letter amendment must be attached to Construction Permit No. AC53-211670 (PSD-FL-187), and shall become part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/JR/pm

Attachments

cc: B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
K. Kosky, KBN

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 8/4/94 to the listed persons.

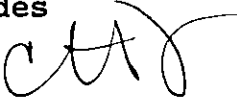
Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Paulina J. Boutwell 8/4/94
(Clerk) (Date)

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: C. H. Fancy 
DATE: August 3, 1994
SUBJECT: Amendment to Construction Permit AC53-211670 (PSD-FL-187)
Mulberry Cogeneration Project

Attached for your approval and signature is a permit amendment prepared by the Bureau of Air Regulation for the above mentioned company to have a customized fuel monitoring schedule as provided by Subpart GG of the federal new source performance standards.

I recommend your approval and signature.

CHF/JR/bjb

Attachment

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

M& 5505

P 872 562 712

MAIL

8/4/94

Mr. William R. Malenius
Polk Power Partners
23293 South Pointe Drive
Laguna Hills, CA 92653

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. William R. Malenius
Polk Power Partners
23293 South Pointe Drive
Laguna Hills, CA 92653

4a. Article Number
P 872 562 712

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

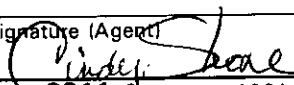
5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER: <ul style="list-style-type: none"> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered. 		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. William R. Malenius Polk Power Partners 23046 Avenida De La Carlota Suite 400 Laguna Hills, California 92650		4a. Article Number P 872 562 709	
5. Signature (Addressee)		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature (Agent) 		7. Date of Delivery	
PS Form 3811, December 1991		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

P 872 562 712



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. William R. Malenius	
Street and No. 23293 South Pointe Drive	
P.O., State and ZIP Code Laguna Hills, CA 92653	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8/4/94 AC53-211670 (PSD-FL-187)	

PS Form 3800, JUNE 1991

P 872 562 709



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. William R. Malenius	
Street and No. 23046 Avenida De La Carlota	
P.O., State and ZIP Code Laguna Hills, CA 92650	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8/16/94 AC53-211670(PSD-FL-187)	

PS Form 3800, JUNE 1991