



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

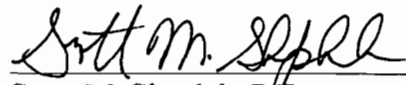
P.E. Certification Statement

Permittee:
Polk Power Partners, Limited Partnership
Mulberry Cogeneration Facility

DRAFT Permit No.: 1050217-001 -AV
Facility ID No.: 1050217

Project type: Initial Title V Air Operation Permit

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

 06/26/97
Scott M. Sheplak, P.E. date
Registration Number: 0048866

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 26, 1997

Mr. Allan Wade Smith
General Manager
Polk Power G.P., Inc.
1125 US 98 South, Suite 100
Lakeland, FL 33801

Re: DRAFT Title V Permit No.: 1050217-001-AV
Mulberry Cogeneration Facility

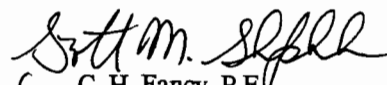
Dear Mr. Smith:

One copy of the DRAFT Title V Air Operation Permit for the Mulberry Cogeneration Facility located at 3600 County Road 555, Bartow, Polk County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Lennon Anderson at 904/488-1344.

Sincerely,


for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/a

Enclosures

cc: Ms. Carla Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Dennis J. Oehring
3600 Highway 555
Bartow, Florida 33830

4a. Article Number

2127635716

4b. Service Type

- Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

7/3/97

5. Signature (Addressee)

6. Signature (Agent)

Dennis J. Oehring

Thank you for using Return Receipt Service.

Z 127 635 716

Receipt for Certified Mail

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



Sent to Mr. Dennis J. Oehring	
Street and No. 3600 Highway 555	
P.O. State and ZIP Code Bartow, Florida 33830	
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	6/30/97
Facility ID#: 1050217-001-AV	
Polk Power Partners - Mulberry	

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.
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Consult postmaster for fee.

3. Article Addressed to:

Mr. Allan Wade Smith
General Manager
Polk Power G.P., Inc.
1125 US 98 South, Suite 100
Lakeland, Florida 33801

4a. Article Number

2127635715

4b. Service Type

- Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

7-2-97

5. Signature (Addressee)

6. Signature (Agent)

Allan Wade Smith

Thank you for using Return Receipt Service.

Z 127 635 715

Receipt for Certified Mail

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



Sent to Mr. Allan Wade Smith	
Street and No. 1125 US 98 South, Suite 100	
P.O. State and ZIP Code Lakeland, Florida 33801	
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	6/30/97
Facility ID#: 1050217-001-AV	
Polk Power Partners, Mulberry	

In the Matter of an
Application for Permit by:

Polk Power Partners, L.P.
3600 County Road 555
Bartow, FL 33831-0824

DRAFT Permit No.: 1050217-001-AV
Mulberry Cogeneration
Polk County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Polk Power Partners, L.P., applied on June 14, 1996, to the permitting authority for a Title V air operation permit for the Mulberry Cogeneration Facility located at 3600 County Road 555, Bartow, Polk County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 904/488-1344; Fax: 904/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., or a party requests mediation as an alternative remedy under Section 120.573, F.S., before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 904/488-9730; Fax: 904/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the permitting authority's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department of Environmental Protection a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

(a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;

(b) A statement of the preliminary agency action;

(c) A statement of the relief sought; and,

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

(a) The names, addresses, and telephone numbers of any persons who may attend the mediation;

(b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;

(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

(f) The name of each party's representative who shall have authority to settle or recommend settlement; and,

(g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573, F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57, F.S., for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within 60 (sixty) days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department of Environmental Protection must enter an order incorporating the agreement of the parties in accordance with the provisions of Section 403.0872(7), F.S. If mediation terminates without settlement of the dispute, the permitting authority shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57, F.S., remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

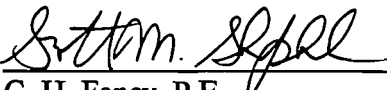
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

for 
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on 6/30/97 to the person(s) listed:

Allan Wade Smith, RO
Dennis J. Oehring, DR

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail on the same date to the person(s) listed:

Kennard F. Kosky, P.E., GA
Bill Thomas, SWD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Pentwell 6/30/97
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**Title V DRAFT Permit No.: 1050217-001-AV
Mulberry Cogeneration
Polk County**

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Polk Power Partners, L.P. for the Mulberry Cogeneration Facility located at 3600 County Road 555, Bartow, Polk County. The applicant's name and address are: Polk Power Partners, L.P., 1125 US 98 South, Suite 100, Lakeland, FL 33801.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.), or a party requests mediation as an alternative remedy under Section 120.573, F.S., before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 904/488-9730; Fax: 904/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 permitting authority's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;

(d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

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(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

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dispute, the Department of Environmental Protection must enter an order incorporating the agreement of the parties in accordance with the provisions of Section 403.0872(7), F.S. If mediation terminates without settlement of the dispute, the permitting authority shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57, F.S., remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979


Affected District/Local Program:

Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 904/488-1344, for additional information.

MEMORANDUM

TO: Scott M. Sheplak, P.E.

FROM: Lennon Anderson 

DATE: June 26, 1997

Re: Intent package for DRAFT Permit No.: 1050217-001-AV
Polk Power Partners, L.P.

Permit Clock: Today is ARMS Day 63
Default Date (Day 90): July 23, 1997

This permit is for the initial Title V air operation permit for the subject facility.

Additional information was requested and a satisfactory response received April 24, 1997. Comments were not received from the District Office.

This facility reported that each emissions unit was in compliance at the time of the application.

This is the initial operation permit for this emissions unit/facility. Compliance has been demonstrated with the requirements of the air construction permit.

Please review.

Responses to your concerns

1. Mr. Wade Smith was contacted and he said that the DR is Dennis Oehring. He will fax the documentation.
2. The secondary boiler is allowed to operate 8,760 hours, but it cannot operate for 8,760 hours at 104.2 M ft³/hr. If it operates at 104.2 ft³/hr, the maximum hours allowed is 4,320.
3. If ppmvd limitations for the turbine were in the AC permit and not in the BACT, they were kept in. Also, if they were in the BACT and not in the AC permit, they were kept in. All other ppmvd limitations from previous applications were removed but kept in Table 2-1.

I recommend that this Intent to Issue be sent out as attached.

SMS/la
[electronic file name: 10502171.mem]

Polk Power Partners, L.P.
Mulberry Cogeneration Facility
Facility ID No.: 1050217
Polk County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1050217-001-AV

Permitting Authority:
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 904/488-1344
Fax: 904/922-6979

Drafted on June 25, 1997

Initial Title V Air Operation Permit
DRAFT Permit No.: 1050217-001-AV

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Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

Permittee:

Polk Power Partners, L.P.
3600 County Road 555
Bartow, FL 33831-0824

DRAFT Permit No.: 1050217-001-AV

Facility ID No.: 1050217

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Mulberry Cogeneration Facility. This facility is located at 3600 County Road 555; UTM Coordinates: Zone 17, 413.6 km East and 3080.6 km North; Latitude: 27° 50' 56" North and Longitude: 81° 52' 39" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Appendix E-1, List of Exempt Emissions Units and/or Activities

APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)

FIGURE 1- SUMMARY REPORT-GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE REPORT (7/96)

Phase II Acid Rain Application/Compliance Plan received June 17, 1996.

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sms/la

Section I. Facility Information.

Subsection A. Facility Description.

This facility has a 126 MW combined cycle cogeneration unit which consists of 1 combustion turbine (CT), 1 Heat Recovery Steam Generator (HRSG) and 1 Secondary Boiler. The facility is fired with natural gas and No. 2 fuel oil, with natural gas being the primary fuel and No. 2 fuel oil as backup fuel.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 17, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-001	Combustion Turbine (CT) with HRSG
-002	Secondary Boiler
-xxx	No. 2 Fuel Oil Tank (720,000 gal)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 17, 1996

Additional Information Request dated January 24, 1997

Additional Information Response received April 24, 1997

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS (version dated 02/27/97), is a part of this permit.

{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b)1., F.A.C.]

4. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

5. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. Not federally enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

[Rule 62-296.320(1)(a), F.A.C.]

7. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 17, 1996.]

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District.

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-001	Combustion Turbine (CT) with HRSG

The combustion turbine (CT) is a GE PG7111EA model with a nameplate rating of 82 MW at ISO. The CT is allowed to burn natural gas or No. 2 fuel oil. Natural gas is the primary fuel and No. 2 fuel oil can be used permanently as back-up fuel. NOx emissions are controlled by dry low-NOx combustors and water-injection. The HRSG services a 44 MW steam generator and furnishes steam to other facilities. The CT and HRSG began commercial operation on August 10, 1994.

{Permitting notes: This emissions unit is regulated under Acid Rain, Phase II; NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; NSPS 40 CFR 60 Subpart A; Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated February 21, 1994.}

The following specific conditions apply to the emissions unit listed above:

A.1. Definitions. For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee.

[40 CFR 60.2; Rule 62-204.800(7)(a), F.A.C.]

Essential Potential to Emit (PTE) Parameters

A.2. Permitted Capacity. The operation rate shall not exceed 869 MMBtu/hr (LHV) at ISO conditions.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.3. Methods of Operation - Fuels.

The permittee shall fire natural gas or No. 2 fuel oil. The primary fuel shall be natural gas with No. 2 fuel oil as backup fuel. The fuel consumption rates (based on operation at 20 ° F) for the turbine shall not exceed those listed below:

Natural Gas		No. 2 Fuel Oil	
<u>M ft³/hr</u>	<u>MM ft³/yr</u>	<u>M lb/hr</u>	<u>MM lb/yr</u>
1013.4	8877.4	55.6	40.0

No. 2 fuel oil can be used permanently as backup fuel for no more than 720 hours per year.

[Rule 62-213.410, F.A.C. and AC53-211670]

A.4. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. All emission limits in **Specific Conditions A.6.** through **A.11.** are based on operation at 59 °F and 60 % relative humidity (ISO conditions).

[AC53-211670]

A.6. Nitrogen Oxides. NO_x emissions shall not exceed 15 ppmvd @ 15% O₂ (52.7 lbs/hr and 230.7 TPY) when firing natural gas.

[AC53-211670 and BACT Determination dated February 21, 1994]

A.7. Nitrogen Oxides. NO_x emissions shall not exceed 42 ppmvd @ 15% O₂ (164.0 lbs/hr and 59.0 TPY) when firing No. 2 fuel oil.

[AC53-211670 and BACT Determination dated February 21, 1994]

A.8. Sulfur Dioxide. The maximum sulfur content of the No. 2 fuel oil shall not exceed 0.1 percent by weight.

[AC53-211670 and BACT Determination dated February 21, 1994]

A.9. Volatile Organic Compound. VOC emissions shall not exceed 9.2 lbs/hr and 3.3 TPY when firing No. 2 fuel oil.

[AC53-211670 and BACT Determination dated February 21, 1994]

A.10. Carbon Monoxide. CO emissions shall not exceed 25 ppmvd @ 15% O₂ (53.0 lbs/hr and 232.0 TPY) when firing natural gas.

[AC53-211670 and BACT Determination dated February 21, 1994]

A.11. Carbon Monoxide. CO emissions shall not exceed 75.3 lbs/hr and 27.1 TPY when firing No. 2 fuel oil.

[AC53-211670 and BACT Determination dated February 21, 1994]

Test Methods and Procedures

A.12. Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

[40 CFR 60.8(c)]

A.13. Compliance with standards in 40 CFR 60, other than opacity, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.

[40 CFR 60.11(a)]

A.14. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operation and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

A.15. Circumvention. No owner or operator subject to the provisions of 40 CFR 60 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[40 CFR 60.12]

A.16. To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.

[40 CFR 60.335(a)]

A.17. In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of 40 CFR 60 or other methods and procedures as specified in this permit, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph 40 CFR 60.335(f).

[40 CFR 60.335(b)]

A.18. The owner or operator shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels (incorporated by reference-see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

[40 CFR 60.335(d)]

A.19. The owner or operator shall determine compliance with the sulfur content standard in **Specific Condition A.8.** by using ASTM D 2880-71.

[40 CFR 60.335(d)]

A.20. To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335 (a) and 40 CFR 60.335(d) of 40 CFR 60.335 to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[40 CFR 60.335(e)]

A.21. Annual compliance with the VOC standard shall be determined by EPA Method 25A as described in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C.

[AC 53-211670]

Monitoring of Operations

A.22. The owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form [see 40 CFR 60.7(d)] to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or, the CMS data are to be used directly for compliance determination, in which case quarterly reports shall be submitted; or, the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each calendar half (or quarter, as appropriate). Written reports of excess emissions shall include the following information:

(1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

(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.

(4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

[40 CFR 60.7(c)(1), (2), (3), and (4)]

A.23. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG and using water injection to control NO_x emissions shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ±5.0 percent and shall be approved by the Administrator.

[40 CFR 60.334(a)]

A.24. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

(1) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.

(2) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with 40 CFR 60.334(b).

[40 CFR 60.334(b)(1) and (2)]

A.25. The permittee shall monitor sulfur content and nitrogen content of natural gas fired in the turbine as follows:

Custom Fuel Monitoring Schedule for Natural Gas

1. Monitoring of fuel nitrogen content shall not be required when firing natural gas.
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 D 3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(d).
 - b. This custom fuel monitoring schedule become effective on August 8, 1994. Sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and 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 year. 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 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.

[40 CFR 60.334(b)(2) and AC 53-211670]

Recordkeeping and Reporting Requirements

A.26. The turbine manufacturer's capacity vs. temperature (ambient) curve shall be included with the compliance test results.

[AC 53-211670]

A.27. Records of sample analysis and fuel supply pertinent to the "Custom Fuel Monitoring Schedule for Natural Gas" in **Specific Condition A.25.** shall be retained for a period of five years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

[AC 53-211670]

A.28. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

a. *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the permitted nitrogen oxide standard by the initial performance test required in 40 CFR 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the initial performance test. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

[Rule 62-296.800, F.A.C.; 40 CFR 60.334(c)(1)]

A.29. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

A.30. The summary report form shall contain the information and be in the format shown in Figure 1 (attached) unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility.

(1) If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator.

(2) If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.

[40 CFR 60.7(d)(1) and (2)]

A.31. The permittee shall maintain a file of all measurements, including continuous monitoring systems, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.

[40 CFR 60.7(f)]

A.32. This emissions unit is also subject to the conditions contained in **Subsection C. Common Conditions.**

Subsection B. This section addresses the following emissions unit(s).

<u>E.U.</u>	<u>Brief Description</u>
<u>ID No.</u> -002	Secondary Boiler

The secondary boiler is for auxiliary steam. It is fired by natural gas. A portion of the exhaust gas from the combustion turbine is vented through the secondary boiler. NOx emissions are controlled with low-dry-NOx combustion technology. This emissions unit began commercial operation on August 10, 1994.

{Permitting notes: The emissions unit is regulated under Acid Rain, Phase II; Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated February 21, 1994}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The operation rate shall not exceed 99 MMBtu/hr (LHV) at ISO conditions.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Methods of Operation - Fuels.

The only fuel allowed to be burned is natural gas. The fuel consumption rates (based on operation at 20 ° F) for the secondary boiler shall not exceed those listed below:

Natural Gas	
<u>M ft3/hr</u>	<u>MM ft3/yr</u>
104.2	450.2*

*Based on maximum firing rate for 4,320 hours per year.
[Rule 62-213.410, F.A.C. and AC 53-211670]

B.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.4. Nitrogen Oxides. NOx emissions shall not exceed 18.3 lbs/hr and 80.0 TPY when firing natural gas.

[AC53-211670 and BACT Determination dated February 21, 1994]

B.5. Nitrogen Oxides. NOx emissions shall not exceed 23.4 lbs/hr and 8.4 TPY when firing No. 2 fuel oil in the combustion turbine.

[AC53-211670 and BACT Determination dated February 21, 1994]

B.6. Sulfur Dioxide. The maximum sulfur content of the No. 2 fuel oil shall not exceed 0.1 percent by weight when fired in the combustion turbine.

[AC53-211670 and BACT Determination dated February 21, 1994]

B.7. Carbon Monoxide. CO emissions shall not exceed 12.6 lbs/hr and 55.2 TPY when firing natural gas.

[AC53-211670 and BACT Determination dated February 21, 1994]

B.8. Carbon Monoxide. CO emissions shall not exceed 13.4 lbs/hr and 4.8 TPY when firing No. 2 fuel oil in the combustion turbine.

[AC53-211670 and BACT Determination dated February 21, 1994]

B.9. This emissions unit is also subject to the conditions contained in **Subsection C. Common Conditions.**

Subsection C. Common Conditions.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-001	Combustion Turbine with HRSG
-002	Secondary Boiler

The following conditions apply to the emissions units listed above:

Emission Limitations and Standards

C.1. Visible Emissions. Visible emissions shall not exceed 10 percent opacity when firing natural gas.
[AC53-211670]

C.2. Visible Emissions. Visible emissions shall not exceed 20 percent opacity when firing No. 2 fuel oil in the combustion turbine.
[AC53-211670]

Excess Emissions

C.3. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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.
[Rule 62-210.700(1), F.A.C.]

C.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 shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

C.5. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary

in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

C.6. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined below. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance to regain the authority to operate at the permitted capacity. **Permitted capacity** is defined as 90 to 100 percent of the maximum operation rate allowed by the permit..

[Rule 62-297.310(2), F.A.C.]

C.7. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

C.8. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

TABLE 297.310-1
 CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

C.9. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

C.10. The permittee shall comply with the requirements contained in APPENDIX SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

C.11. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

C.12. Annual compliance with the NO_x, CO, SO₂ and visible emission standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C.

NO_x: EPA Method 20
CO: EPA Method 10
SO₂: Fuel supplier's sulfur analysis
VE: EPA Method 9

[AC 53-211670]

Continuous Monitoring Requirements

C.13. The power output from the generators shall be metered and continuously recorded. The data shall be logged daily and maintained so that it can be provided to DEP upon request.
[AC 53-211670]

Recordkeeping and Reporting Requirements

C.14. The owner or operator shall notify the Southwest District Office of the Department, in writing, at least 15 days prior to the date on which each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
[Rule 62-297.310(7)(a)9., F.A.C.]

C.15. In case of excess emissions resulting from malfunctions, Polk Power Partners, L.P. shall notify the Department's Southwest District Office in accordance with 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

C.16. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.

7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

Reasonable Assurances

C.17. Any other operating parameters established during compliance testing and/or inspections, that will ensure the proper operation of this facility, are considered part of this operating permit. Said operating parameters include, but are not limited to: Fuel flow rate and heat input rate.

[Rule 62-4.070(3), F.A.C.]

Section IV. This section is the Acid Rain Part.

Operated by: Polk Power Partners, L.P.
ORIS code: 54426

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-001	Combustion Turbine with HRSG
-002	Secondary Boiler

A.1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

DEP Form No. 62-210.900(1)(a), dated December 27, 1995.
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) requirements for each Acid Rain unit is as follows:

<u>E.U. ID No.</u>	<u>EPA ID</u>	<u>Year</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>
-001	01	SO₂ allowances, under Table 2 or 3 of 40 CFR Part 73	0*	0*	0*
		NO_x limit	**	**	**

<u>E.U. ID</u> No.	EPA ID	Year	2000	2001	2002
-002	02	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	0*	0*	0*
		NOx limit	**	**	**

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.]

**If applicable, by January 1, 1999, this Part will be reopened to add NOx requirements in accordance with the regulations implementing section 407 of the Clean Air Act.

A.3. Comments, notes, and justifications: none

Appendix H-1, Permit History/ID Number Changes

Polk Power Partners
Mulberry Cogeneration Project

Facility ID No.: 1050217

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Combustion Turbine (CT) with HRSG	AC53-211670/ PSD-FL-187	11/24/92	12/31/95	11/1/96	8/3/94
-002	Secondary Boiler	AC53-211670/ PSD-FL-187	11/24/92	12/31/95	11/1/96	8/3/94

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 40TPA530217

To: **Facility ID No.:** 1050217

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Table 1-1, Summary of Air Pollutant Standards and Terms

Polk Power Partners, L.P.
Mulberry Cogeneration

DRAFT Permit No.: 1050217-001-AV
Facility ID No.: 1050217

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
-002 Secondary Boiler

Table 1-1, Summary of Air Pollutant Standards and Terms

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
NOx	natural gas	8760		18.3	80.0				III.B.4.
NOx	No. 2 Oil fired in CT	720		23.4	8.4				III.B.5
SO2	No. 2 Oil fired in CT	720	0.1 % by weight						III.B.6.
CO	natural gas	8760		12.6	55.2				III.B.7.
CO	No. 2 Oil fired in CT	720		13.4	4.8				III.B.8.

Notes:

* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10502171.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms

Polk Power Partners, L.P.
Mulberry Cogeneration

DRAFT Permit No.: 1050217-001-AV
Facility ID No.: 1050217

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
-001 Combustion Turbine (CT) with HRSG

Table 1-1, Summary of Air Pollutant Standards and Terms

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
NOx	natural gas	8760	25 ppmvd @ 15	52.7	230.7				III. A.5.
NOx	No. 2 Oil	720	2 ppmvd @ 15	164.0	59.0				III.A.6.
SO2	No. 2 Oil	720	0.1 % by weight						III.A.7.
VOC	No. 2 Oil	720	0 ppmvd @ 15	9.2	3.3				III.A.8.
CO	natural gas	8760	5 ppmvd @ 15	53.0	232.0				III.A.9.
CO	No. 2 Oil	720	5 ppmvd @ 15	75.3	27.1				III.A.10.

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

[electronic file name: 10502171.xls]

Table 2-1, Summary of Compliance Requirements

Polk Power Partners, L.P.
Mulberry Cogeneration Facility

DRAFT Permit No.: 1050217-001-AV
Facility ID No.: 1050217

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
-001	Combustion Turbine with HRSG
-002	Secondary Boiler

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS **	See permit condition(s)
CO	Natural gas and No. 2 Oil	EPA Method 10	annual	26-Aug	1 hour		III.C.12, 13.
SO2	Natural gas	ASTM D 1072-80, D 3031-81, D 4084-82 or D 3246-81	From bulk storage: after each shipment no bulk storage: daily		not applicable not applicable		III.A.13., C.13.
	No. 2 Oil	ASTM D 2880-71	From bulk storage: after each shipment no bulk storage: daily		not applicable not applicable		III.A.13., C.13.
VE	Natural gas and No. 2 Oil	EPA Method 9	annual	26-Aug	1 hour		III.C.12., C.13.
VOC	No. 2 Oil	EPA Method 25A	annual	26-Aug	1hour		III.A.16., C.12.

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

electronic file name: 10502172.xls

Appendix E-1, List of Exempt Emissions Units and/or Activities.

Mulberry Cogeneration Facility
Mulberry Cogeneration Facility

DRAFT Permit No.: 1050217-001-AV
Facility ID No.: 1050217

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

1. Comfort heating < 1 MMBtu/hr
2. Internal combustion engines - mobile sources
3. Non-industrial vacuum cleaning
4. Refrigeration equipment
5. Vacuum pumps for labs
6. Steam cleaning equipment
7. Sanders < 5 sq. ft.
8. Lab equipment used for chemical or physical analyses
9. Brazing, soldering or welding equipment
10. Emergency generators < 32,000 gal/yr
11. General purpose engines < 32,000 gal/yr
12. Fire and safety equipment
13. Surface coating > 5% VOC; 6 gal/month
14. Surface coating < 5% VOC
15. Freshwater cooling towers. The cooling towers do not use chromium-based treatment chemicals.

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Mulberry Cogeneration Facility
Mulberry Cogeneration Facility

DRAFT Permit No.: 1050217-001-AV
Facility ID No.: 1050217

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U.

<u>ID No.</u>	<u>Brief Description of Emissions Units and/or Activity</u>
-xxx	No. 2 Fuel Oil Tank (720,000 gal)

FIGURE 1--SUMMARY REPORT--GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE (version dated 7/96)

[Note: This form is referenced in 40 CFR 60.7, Subpart A-General Provisions]

Pollutant (Circle One): SO₂ NO_x TRS H₂S CO Opacity

Reporting period dates: From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer: _____

Model No.: _____

Date of Latest CMS Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period ¹: _____

Emission data summary ¹	CMS performance summary ¹
1. Duration of excess emissions in reporting period due to:	1. CMS downtime in reporting period due to:
a. Startup/shutdown	a. Monitor equipment malfunctions
b. Control equipment problems	b. Non-Monitor equipment malfunctions
c. Process problems	c. Quality assurance calibration
d. Other known causes	d. Other known causes
e. Unknown causes	e. Unknown causes
2. Total duration of excess emissions	2. Total CMS Downtime
3. Total duration of excess emissions x (100) / [Total source operating time] % ²	3. [Total CMS Downtime] x (100) / [Total source operating time] % ²

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

Note: On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

Name: _____

Signature: _____ Date: _____

Title: _____



LENNON

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 24, 1997

CERTIFIED MAIL - Return Receipt Requested

Mr. Allan Wade Smith
General Manager
Polk Power G.P., Inc
1125 U.S. 98 South, Suite 100
Lakeland, FL 33801

RE: Request for Additional Information Regarding Initial Title V Permit Application
File No. 1050217-001-AV
Mulberry Cogeneration Facility, Polk County

Dear Mr. Smith:

Your initial Title V permit application for the Mulberry Cogeneration Facility was "timely and complete" for purposes of the initial Title V application submission (see Rules 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your permit application, the Department will need the additional information below pursuant to Rule 62-213.420(1)(b)3., F.A.C. and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic. Should your response to any of the items below require new calculations, please submit the new calculation, assumptions, reference material and appropriate revised pages of the application form.

Combustion Turbine (Emissions Unit 1)

1. Please explain how 946 MMBtu per SCC Unit was obtained for field 9 under Segment (Process/Fuel) Information.
2. Under Section G, Emissions Unit Pollutants, the only control device listed is "024", burner design. According to the BACT determination, duct burner and water injection

Mr. Allan Wade Smith
January 24, 1997
Page 2

would be the methods used to control NO_x. Please explain why water injection (code 028) was not included and submit the appropriate information.

3. For carbon monoxide (CO) under Section H, Emissions Unit Pollutant Detail Information, the emission factor listed in field 6 is 35 ppmvd. However, permit Nos. PSD-FL-187/AC53-211670 lists 25 ppmvd as the limitation through 12/31/97 (see Specific Condition No. 2, Note (a)). Please explain how 35 ppmvd was obtained. If this is an error, please submit the revised appropriate application pages.
4. Please provide SO₂ calculations for field 3 (Potential Emissions) under Section H, and field 4 (Equivalent Allowable Emissions) for sections A and B under Allowable Emissions.
5. According to Specific Condition 6 of permits PSD-FL-187/AC53-211670, the flow rates of natural gas, fuel oil and water injection to the cogeneration turbine along with the power output of the generators are required to be metered and continuously recorded. Nothing under Section J (Continuous Monitor Information) indicates that the flows for natural gas, fuel oil, water injection and power output from the generators are continuously metered and recorded. Please submit the appropriate information.

Secondary Boiler (Emissions Unit 2)

6. Please provide SO₂ calculations for field 3 (Potential Emissions) under Section H, and field 4 (Equivalent Allowable Emissions) for sections A and B under Allowable Emissions.

Exempt, Unregulated, and Trivial Emissions Units and/or Activities

7. Currently, in order for an emissions unit and/activity to be 'exempt' in the Title V permit, the emissions unit and/or activity cannot exceed one or more of the emissions thresholds or have a unit-specific requirement (see Rule 62-213.430(6), F.A.C.). Also, the Department has issued guidance on emissions units and/or activities that are considered 'trivial' (see enclosed DARM-PER/V-15, revised March 15, 1996). These emissions units and/or activities no longer need to be included in Title V permit applications. Many of the emissions units and/or activities included in your attachment (MB-E03-B6) fall into this category. 'Trivial' emissions units and/or activities will not be included in the Title V permit. Please update your attachment (MB-E03-B6) and provide sufficient information to classify the emissions units and/or activities into two new categories - those that are 'exempt' and those that are 'unregulated.'

Mr. Allan Wade Smith
January 24, 1997
Page 3

To properly update the attachment (MB-E03-B6) you need to consider the requirements of Rule 62-213.430(6), F.A.C. If the answer to any of these questions is yes, an emissions unit and/or activity cannot be 'exempt.'

- (1) Do any of the units or activities have a unit-specific applicable requirement?
- (2) Does each unit emit or have the potential to emit equal to or greater than:
 - 1,000 pounds/year of any hazardous air pollutant (HAP);
 - 2,500 pounds/year of total HAPs; and/or
 - 5 TPY if any other regulated air pollutant, i.e., volatile organic compound (VOC)?

Miscellaneous

8. What is the annual amount of solvents (in gallons) used in the cleaners/degreasers?
9. For the distillate fuel oil tank with storage capacity of 700,000 gallons, what kind of storage tank is it (i.e., internal floating roof, external floating roof, etc.)? When was the tank constructed?

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form DEP form No. 62-210.900, effective March 21, 1996 (enclosed).

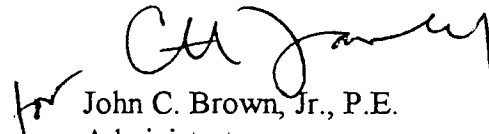
Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Mr. Bill Thomas at the FDEP Southwest District Office, 3804 Coconut Palm Drive, Tampa, FL 33619-8218.

Mr. Allan Wade Smith
January 24, 1997
Page 4

If you should have any questions, please call Lennon Anderson or me at (904)
488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/la/ss

Enclosures

cc: Kennard F. Kosky, P.E., KBN
Bill Thomas, SWD
John Paul Jones, CSW Energy

Z 392 940 901

BEST AVAILABLE COPY



Receipt for Certified Mail

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

PS Form 3800, March 1993

Sent to <i>Polk Power</i> <i>Allan Wade Smith G.P., Inc.</i>	
Street and No. <i>1125 U.S. 98, South, Ste. 100</i>	
P.O., State and ZIP Code <i>Lakeland, Fl 33801</i>	
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	

old at line over top of envelope to the right of the return address

CERTIFIED

Z 392 940 901

MAIL

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.

3. Article Addressed to:
 Mr. Allan Wade Smith
 General Manager
 Polk Power G.P., Inc.
 1125 U.S. 98 So., Suite 100
 Lakeland, Florida 33801

5. Signature (Addressee)

6. Signature (Agent)

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

1. Addressee's Address

2. Restricted Delivery

Consult postmaster for fee.

4a. Article Number
Z 392 940 901

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery

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

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•DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION - TITLE V
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

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Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: () - Fax: () -
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

* Attach letter of authorization if not currently on file.

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 [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance 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.

Signature

Date

(seal)

* Attach any exception to certification statement.

Memorandum

Florida Department of
Environmental Protection

DARM-PER/V-15
REVISED

TO: District Air Program Administrators
County Air Program Administrators
Bureau of Air Regulation Engineers

FROM: Howard L. Rhodes, Director *HLR*
Division of Air Resources Management

DATE: March 15, 1996

SUBJECT: Revision to Trivial List of Activities at a
Title V Facility

This guidance replaces the February 12, 1996 Guidance, DARM-PER/V-15. The only change is the rule siting in text of document.

Attachment A of a July 3, 1995 Environmental Protection Agency (EPA) memorandum, "Initial Operating Permit Application Compliance Certification Policy," commonly called the White Paper, attached, comprises a listing of trivial activities.

With one exception, Title V permits will not require that these activities be listed in the Title V permit applications or the Title V permits. These activities are treated as if they emit no air pollutants.

The EPA listing conditionally includes painting under the category of plant maintenance and upkeep activities (page 1) as a trivial activity. If painting activities at a Title V source in Florida result in emissions that are below the thresholds for exemption in Rule 62-213.430(6)(b), F.A.C., they may be included in the application as exemptible activities. Otherwise, they should be listed, but not quantified, as unregulated activities, provided the painting activities are not subject to an applicable requirement. If the painting activities result in emissions that trigger applicable requirements, they must be reported and quantified.

HLR/jb/k

Attachment

as or has reason to believe would be emitted in an amount equal to or greater than:

a. 5.0 tons per year for carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds; or

b. 500 pounds per year for lead and lead compounds expressed as lead.

4. Each Title V source that emits or has the potential to emit any hazardous air pollutant or total hazardous air pollutants in a major amount as set forth in Rule 62-213.3(c)1., F.A.C., shall identify, for each emissions unit, each such pollutant which the applicant emits or has reason to believe would be emitted in an amount equal to or greater than:

a. 1,000 pounds per year for each hazardous air pollutant.

b. 2,500 pounds per year for total hazardous air pollutants.

5. Title V sources which are also subject to the Federal Acid Rain Program shall report all emissions of sulfur dioxide and nitrogen oxides from any acid rain source in accordance with this subsection or the reporting requirements of the Federal Acid Rain Program, whichever is more stringent.

(d) Process and operating information;

(e) Control equipment information;

(f) Calculations;

(g) Identification of all applicable requirements and test methods;

(h) Limitations on source operation affecting emissions;

(i) Proposed alternate methods of operation;

(j) Compliance statement;

(k) Compliance schedule and methodology, if applicable;

(l) Reporting and recordkeeping requirements;

(m) A list of emissions units or activities for which exemption is requested because of size or production rate and any information needed to demonstrate

that the units or activities qualify for exemption under the provisions of Rule 62-213.430(6), F.A.C.

(4) Certification by Responsible Official. In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to this chapter shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Specific Authority: 403.061, 403.087, F.S.
Law Implemented: 403.061, 403.0872, F.S.
History: New 11-28-93; Amended 4-17-94; Formerly 17-213.420; Amended 11-23-94, 4-2-95, 10-11-95, 3-13-96, 3-20-96.

62-213.430 Permit Issuance, Renewal, and Revision.

(1) Action on Application. Except for those applications submitted pursuant to Rule 62-213.420(1)(a)1., F.A.C., the Department shall issue a draft permit or a determination that the requested permit be denied within 90 days after receipt of the latest of: the application; the last item of information requested pursuant to Rule 62-213.420(1)(b), F.A.C.; or, a written request to process the application without the requested information. The Department shall issue a permit, permit revision or renewal only after all of the following conditions have been met:

(a) The applicant has submitted a complete application, properly certified by a responsible official as required by Rule 62-213.420(4), F.A.C., and either all corrected and supplemental information requested or a written request to process the application without such information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.;

(b) The Department and the applicant have complied with the requirements for notice and public participation described in Rules 62-103.150 and 62-210.350, F.A.C.;

(c) The Department has complied with the requirements for notifying and responding to affected states and approved local air programs pursuant to Rule 62-213.450(2) and (3), F.A.C.;

(d) The Department has provided EPA with a copy of the draft permit, proposed permit and any notices required under Rule 62-213.450(1) and (2), F.A.C., and has not received written EPA objection to issuance of the permit within the time period specified in Rule 62-213.450(4). If the Department receives timely EPA objection, the Department shall not take final action until the Department receives written notice that the objection is resolved or withdrawn;

(e) The Department has provided a statement to EPA setting forth the basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

(2) Permit Denial. If the Department proposes to deny the permit application, the Department shall provide the applicant an explanation of the denial in accordance with Rule 62-4.070(6), F.A.C.

(3) Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

(4) Permit Revision Procedures. Permit revisions shall meet all requirements of this chapter, including those for content of applications, public participation, review by approved local air programs and affected States, and review by EPA, as they apply to permit

issuance and permit renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference.

(5) EPA Recommended Actions. Within 90 days after receipt of notification from EPA that cause exists to modify, suspend, or revoke a permit, the Department shall investigate and determine whether cause exists pursuant to 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference, and shall forward the determination to EPA. If cause exists, the Department shall proceed according to the requirements of Rule 62-4.080 or 62-4.100, F.A.C., and 40 CFR 70.7(f) to modify, suspend, or revoke the permit.

(6) Exemption of Emissions Units or Pollutant-Emitting Activities.

(a) 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, permit renewal or permit revision application submitted pursuant to this chapter. Exemptions shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify for exemption from permitting pursuant to this rule.

(b) No exemption shall be granted to any emissions unit or activity if:

1. Such unit or activity would be subject to any unit-specific applicable requirement;

2. Such unit or activity, in combination with other and activities proposed for exemption, would cause facility to exceed any major source threshold(s) as set in Rule 62-213.420(3)(c)1., F.A.C., unless it is pledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); or

3. Such unit or activity would emit or have the potential to emit:

a. 500 pounds per year or more of lead and lead compounds expressed as lead;

b. 1,000 pounds per year or more of any hazardous pollutant;

c. 2,500 pounds per year or more of total hazardous pollutants; or

d. 5.0 tons per year or more of any other regulated pollutant.

Rule Authority: 403.061, 403.087, F.S.

Implemented: 403.031, 403.061, 403.087, 403.0872,

History: New 11-28-93, Formerly 17-213.430; Amended 11-94, 3-13-96, 3-20-96.

62-213.440 Permit Content.

(1) Standard Permit Requirements. Each permit issued under this chapter shall incorporate all applicable requirements for the Title V source and for the method of operation proposed by the applicant and approved by the Department. Each such permit shall include all emission limitations and standards, including operational requirements and limitations that ensure compliance with all applicable requirements, with reference to the Department's rule authority for each term and condition, and identification of any difference in the permit condition from the applicable requirement upon which the term and condition is based. Emissions units or pollutant-releasing activities within a Title V source exempted by Rule 62-210.300(3), F.A.C., or by specific exemption

granted by the Department consistent with Rule 62-4.040(1)(b), F.A.C., shall be identified.

(a) Permit Duration. Permits for sources subject to the Federal Acid Rain Program shall be issued for terms of five years. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five years.

(b) Monitoring and Related Recordkeeping and Reporting Requirements.

1. Each permit shall specify the following requirements with respect to monitoring:

a. Emissions monitoring and analysis procedures or test methods specified by applicable requirements;

b. Where the applicable requirement does not specify a method for periodic testing or instrumental or noninstrumental monitoring, periodic monitoring sufficient to yield reliable data and demonstrate compliance with the permit. Such monitoring requirements shall assure use of recordkeeping terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement; and

c. Requirements concerning the use, maintenance, and installation of monitoring equipment or methods.

2. The permit shall incorporate all applicable recordkeeping requirements including:

a. Records of monitoring information that specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses;

b. Retention of records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original

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ATTACHMENT A

LIST OF ACTIVITIES THAT MAY BE TREATED AS "TRIVIAL"

The following types of activities and emissions units may be presumptively omitted from part 70 permit applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities.

Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.

Air-conditioning units used for human comfort that do not have applicable requirements under title VI of the Act.

Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

Non-commercial food preparation.

Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.

Janitorial services and consumer use of janitorial products.

Internal combustion engines used for landscaping purposes.

Laundry activities, except for dry-cleaning and steam boilers.

Bathroom/toilet vent emissions.

Emergency (backup) electrical generators at residential locations.

Tobacco smoking rooms and areas.

Blacksmith forges.

Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification.⁴

⁴Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if

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Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.

Portable electrical generators that can be moved by hand from one location to another.⁵

Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.

Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.⁶

Air compressors and pneumatically operated equipment, including hand tools.

Batteries and battery charging stations, except at battery manufacturing plants.

Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.⁷

Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Drop hammers or hydraulic presses for forging or metalworking.

Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

Vents from continuous emissions monitors and other analyzers.

otherwise required.

⁵ "Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.

⁶ Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds. Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

⁷ Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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Natural-gas pressure regulator vents, excluding venting at oil and gas production facilities.

Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.

Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.

CO₂ lasers, used only on metals and other materials which do not emit HAP in the process.

Consumer use of paper trimmers/binders.

Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.

Laser trimmers using dust collection to prevent fugitive emissions.

Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.¹

Routine calibration and maintenance of laboratory equipment or other analytical instruments.

Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

Hydraulic and hydrostatic testing equipment.

Environmental chambers not using hazardous air pollutant (HAP) gasses.

Shock chambers.

Humidity chambers.

Solar simulators.

Fugitive emission related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

¹ Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.

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Process water filtration systems and demineralizers.

Demineralized water tanks and demineralizer vents.

Boiler water treatment operations, not including cooling towers.

Oxygen scavenging (de-aeration) of water.

Ozone generators.

Fire suppression systems.

Emergency road flares.

Steam vents and safety relief valves.

Steam leaks.

Steam cleaning operations.

Steam sterilizers.

Date: 9/19/97 11:34:48 AM
From: Elizabeth Walker TAL
Subject: New Posting
To: See Below

There is a new posting available on the Florida website.

MULBERRY COGEN FACILITY 1050217001AV Proposed

The federal notification letter is encoded and attached. Please let me know if you have any questions.

Thanks,
Elizabeth

FLORIDA's Electronic Notification Cover Memorandum

TO: Carla E. Pierce, U.S. EPA Region 4
THRU: Scott M. Sheplak, P.E., Tallahassee Title V Section *SM*
FROM: Lennon Anderson, Permit Engineer *LA*
DATE: 6/30/97
RE: U.S. EPA Region 4 Title V Operation Permit Review

Pursuant to the 1996 comprehensive Title V operation permit review strategy contained in the Florida/EPA Implementation Agreement, the following Title V operation permit(s) and associated documents are made available for your review/comment prior to issuance.

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Polk Power Partners	Polk	INTERNET	1050217d.zip

This zipped file contains the following electronic files:

Fednot.doc
1050217i.doc
1050217d.doc
10502171.xls
10502172.xls
1050217u.doc
1050217e.doc