



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 20, 2007

Mr. Allen Czerkiewicz (allen.czerkiewicz@northernstargen.com)
Plant Manager and Authorized Representative
Mulberry Cogeneration Facility
3600 County Road 555
Bartow, Florida 33831-0824

Re: Request for Additional Information Regarding Heat Input Request at Mulberry Cogeneration Facility
File No.: 1050217-006-AC

Dear Mr. Czerkiewicz:

The Department has received your air construction permit application for the Mulberry Cogeneration Facility for the purpose of increasing the heat input limit. However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations or result in changes to the submitted information, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form, certified by your Professional Engineer.

1. How many hours per 12 month period could the unit potentially be operated at the higher firing temperature?
2. Is there a direct correlation between the heat input rate and the firing temperature for this unit?
3. Is there a direct correlation between the firing temperature and the NO_x emissions concentration (ppm) and mass emissions rate (lb/hr) for this unit?
4. Please provide the established heat input vs. NO_x emissions output curves for this unit over the past several years (i.e. before the recent 5% increase, after the recent 5% increase). If possible, please also provide a predicted curve for the heat input rate following the requested additional 6% increase in heat input.
5. Please explain why you are requesting an increase in the allowable hourly NO_x mass emission rate from 52.7 lb/hour (which is based on the 15 ppm limit) to 58.8 lb/hour, but will be able to continue to operate within the permit limit of 15 ppmvd at all conditions.
6. Based on the information contained in the application and a review of previous information, it appears that the unit routinely operates at about half of the allowable NO_x emissions concentration limit. Please explain how and why an additional 6% increase in heat input will create a need to increase the lb/hr emissions limit by almost 12% (52.7 lb/hr to 58.8 lb/hr).

The above comments require a written response to the Department within ninety days of receipt of this notice unless additional time is requested pursuant to Rule 62-4.055(1), F.A.C.

If you should have any questions, please contact me at (850) 921-9531.

Sincerely,



Jonathan Holtom, P.E.
North Permitting Section

/jh .

CC: Mr. Scott Osbourn, P.E., Golder Associates (E-mail) (sosbourn@golder.com)
Mr. Dave Kellermeyer, Northern Star Generation (E-mail) (dave.kellermeyer@northernstargen.com)
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