



Annual Performance Report Form

Facility Name: INDIANTOWN COGENERATION L. P.

Final
2001

Performance Track ID #: A04-0028

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: July 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 Name of your facility: INDIANTOWN COGENERATION LIMITED PARTNERSHIP
- A.2 Name of your parent company: PG&E NATIONAL ENERGY GROUP
- A.3 Facility contact person for the Performance Track program:
Name: Mr./Mrs./Ms./Dr. Mr. GEORGE K. "Chip" ALLEN
Title: GENERAL MANAGER
Phone: 561-597-6500 Fax: 561 597 6210 E-mail: chip.allen@neg.pge.com
- A.4 Facility's location: INDIANTOWN. FLORIDA
Street Address: 13303 S. W. SILVER FOX LANE
Street Address (cont.):
City/State/Zip Code: INDIANTOWN/ FLORIDA/ 34956
- A.5 Facility's website address (if any): www.neg.pge.com/sites_regions/indiantown.html
- A.6 Number of employees (full-time equivalents) who currently work in the facility:
 Fewer than 50 50 - 99 100 - 499 500 - 1000 More than 1000
- A.7 Does your company meet the Small Business Administration definition of a small business for your sector? Yes No
- A.8 North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 221112
- A.9 In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. Yes No
- A.10 Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
"NO CHANGES"

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

- a. Was an EMS audit or other assessment done by an independent third party?
 Yes No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

THE AUDIT WAS A COMPREHENSIVE EMS AUDIT FOCUSING ON ALL THE EMS ELEMENTS, CONDUCTED AGAINST THE NEG EMS PROGRAM EXPECTATIONS, WHICH HAVE BEEN DESIGNED CONSISTENT WITH ISO 14001. CONDUCTED IN APRIL 2001. THE AUDIT COVERED ICLP'S ENVIRONMENTAL POLICY, ASPECTS & IMPACTS, TARGETS & OBJECTIVES, OPERATIONAL CONTROLS, RESOURCES, RESPONSIBILITIES, TRAINING, DOCUMENTATION, COMMUNICATION, ASSESSMENTS AND MANAGEMENT REVIEWS.

- b. Was an internal or corporate EMS audit conducted? Yes No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

SAME AS ABOVE. OUR CORPORATE AUDITS ARE CONDUCTED BY AN INDEPENDENT THIRD PARTY.

- c. Was a compliance audit conducted? Yes No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

FOCUS AIR AUDIT IN APRIL 2001 BY ERM. AUDIT WAS BASED ON COMPLIANCE WITH THE CLEAN AIR ACT AND THE PG&E NATIONAL ENERGY GROUP'S AUDIT PROGRAM, A FULL COMPLIANCE AUDIT IS CONDUCTED AT LEAST EVERY THREE YEARS, AND MAY BE AUGMENTED BY FOCUSED AUDITS ON PARTICULAR AREAS OF INTEREST. LAST FULL COMPREHENSIVE COMPLIANCE AUDIT WAS CONDUCTED IN 2000.

- d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

CONCURRENT WITH THE FOCUSED AIR AUDIT AND THE EMS AUDIT, A FOLLOW UP AUDIT WAS CONDUCTED TO EVALUATE CLOSURE OF THE ITEMS IDENTIFIED IN THE PREVIOUS COMPLIANCE AUDIT. ALL AUDIT FINDINGS, BE THEY EMS, OR COMPLIANCE ITEMS, ARE REPORTED TO SENIOR MANAGEMENT, AND FORMAL CLOSE OUT ACTION PLANS ARE PREPARED WITH RESPONSIBILITIES AND DATES ASSIGNED. PROGRESS IS REPORTED TO SENIOR MANAGEMENT MONTHLY, UNTIL ALL ITEMS HAVE BEEN CLOSED. DOCUMENTATION IS MAINTAINED.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

ASPECT/IMPACT EVALUATION WAS REVISED TO INCLUDE LIKELIHOOD OF EACH IMPACT'S OCCURENCE.

TARGETS AND OBJECTIVES WERE FURTHER REVISED AND UPDATED.

DOCUMENT AND RECORDKEEPING MECHANISMS ARE UNDER REVIEW.

NONCONFORMANCE TRACKING MECHANISM WAS IMPROVED.

SELF ASSESSMENT MECHANISM WAS STRENGTHENED.

MANAGEMENT OF CHANGE PROGRAM STRENGTHENED.

STRENGTHENED REPORTING FORMAT AND DETAILS INCLUDED IN REPORTING FORMS.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

Yes No No such instances identified

If no, please explain your plans to correct these instances. ALL ITEMS HAVE EITHER BEEN RESOLVED OR ARE IN THE PROCESS OF BEING ADDRESSED.

g. When was the last Senior Management review of your EMS completed? *mo/yr* DECEMBER 2001 & FEBRUARY 2002

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. NICHOLAS LARYEA

Title: ENVIRONMENTAL MANAGER

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? Yes No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* August 2001, REFINED IN November 2001

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress has been made during the reporting year*.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
NOX & SOX REDUCTION	SEE SECTION "C"
INCREASE THE USAGE OF SYNTHETIC OIL	IN 2001 ICLP SWITCHED 15% OF ITS OIL USAGE FROM PETROLEUM BASED TO SYNTHETIC OIL.
DECREASE BTU/Kwhr BY 100	SEE SECTION "C"
EVALUATE WATER CONSERVATION OPPORTUNIES.	EXPLORED ADDITIONAL CONTROLS TO REDUCE INTERNAL WATER USAGE, AND TO MAXIMIZE WATER MANAGEMENT OPPORTUNITIES.
INVESTIGATE CO2 REDUCTION ALTERNATIVES, CONTROL SF6 EMISSIONS.	SEE SECTION C, IMPLEMENTED SF6 MANAGEMENT, MONITORING, AND RECORDKEEPING PROCEDURES. PURSUING CONSOLIDATION OF RESPONSIBILITIES TO ENSURE PROPER MANAGEMENT OF SF6 GAS AND EQUIPMENT.
ZERO FUGITIVE DUST EMISSIONS	STRENGTHENED CONTROLS ON FLYASH HANDLING OPERATIONS, CONDUCTED REFRESHER TRAINING FOR EMPLOYEES WITH ASH HANDLING JOB RESPONSIBILITIES.

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): AIR EMISSION					
Aspect (see page 16 of the instructions): NOX					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	2549	1970.1			(optional)
<i>Measurement Units</i>	TONS/YEAR				
<i>Normalizing Factor*</i>	1.0	0.85			(optional)
<i>Basis for your Normalizing Factor*</i>	OPERATING HOURS				
<i>Normalized Quantity* (per year)</i>	2549	2318			2102
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

THIS IMPROVEMENT WAS ACHIEVED BY REFURBISHING, BALANCING AND TUNING THE COMBUSTION SYSTEM AND THE MILLS. ICLP INTENDS TO CONTINUE NOX REDUCTION BY IMPROVING THE PERFORMANCE OF OUR SCR SYSTEM. EXAMPLES OF THE IMPROVEMENTS ANTICIPATED INCLUDE AMMONIA SPRAY FLOW IMPROVEMENT, CATALYST MANAGEMENT AND CATALYST REGENERATION USING REGENERATION TECHNIQUES.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

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C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): AIR EMISSION					
Aspect (see page 16 of the instructions): SO2					
	<i>Baseline</i> <i>(as stated in</i> <i>your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance</i> <i>Commitment</i> <i>(the goal stated</i> <i>in your</i> <i>application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity</i> <i>(per year)</i>	2549	1766			(optional)
<i>Measurement Units</i>	TONS/YEAR				
<i>Normalizing</i> <i>Factor*</i>	1.0	0.85			(optional)
<i>Basis for your</i> <i>Normalizing Factor*</i>	OPERATING HOURS				
<i>Normalized Quantity*</i> <i>(per year)</i>	2549	2078			2102
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

THIS IMPROVEMENT WAS ACHIEVED BY REFURBISHING, BALANCING AND TUNING THE COMBUSTION SYSTEM AND THE MILLS. ICLP INTENDS TO CONTINUE NOX REDUCTION BY IMPROVING THE PERFORMANCE OF OUR SCR SYSTEM. EXAMPLES OF THE IMPROVEMENTS ANTICIPATED INCLUDE AMMONIA SPRAY FLOW IMPROVEMENT, CATALYST MANAGEMENT AND CATALYST REGENERATION USING REGENERATION TECHNIQUES.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.2 Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): ENERGY USE					
Aspect (see page 16 of the instructions): REDUCTION OF INTERNAL ENERGY USE					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	30,000,504	25,094,718			(optional)
<i>Measurement Units</i>	BTU				
<i>Normalizing Factor*</i>	1.0	0.85			(optional)
<i>Basis for your Normalizing Factor*</i>	OPERATING HOURS				
<i>Normalized Quantity* (per year)</i>	30,000,504	29,523,198			28,902,220
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

ICLP IS ACHIEVING THIS TARGET BY REPLACING OLD MOTORS/EQUIPMENT WITH MORE ENERGY EFFICIENT ONES AS THEY FAIL OR BREAKDOWN, AND BY EVALUATING HOW HIGH ENERGY CONSUMING EQUIPMENT IS OPERATED.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.3 Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): WASTE					
Aspect (see page 16 of the instructions): TOTAL SOLID WASTE (Ash sent to landfill)					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	175,600	144,291			(optional)
<i>Measurement Units</i>	TONS				
<i>Normalizing Factor*</i>	1.0	0.85			(optional)
<i>Basis for your Normalizing Factor*</i>	OPERATING HOURS				
<i>Normalized Quantity* (per year)</i>	175,600	169,754			87,800
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

ICLP IS PURSUING OPPORTUNITIES FOR BENEFICIAL ASH APPLICATION. IN 2001 WE LOST ONE OF OUR CUSTOMERS TO A COMPETITOR, THIS RESULTED IN A REDUCTION OF THE PERCENTAGE OF ASH BENEFICIALLY USED IN 2001.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): EMISSIONS

Aspect (see page 16 of the instructions): REDUCE CARBON DIOXIDE EMISSIONS.

	<i>Baseline</i> <i>(as stated in</i> <i>your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance</i> <i>Commitment</i> <i>(the goal stated</i> <i>in your</i> <i>application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity</i> <i>(per year)</i>	2.2	2.4			(optional)
<i>Measurement Units</i>	MILLION TONS				
<i>Normalizing</i> <i>Factor*</i>	1.0	0.85			(optional)
<i>Basis for your</i> <i>Normalizing Factor*</i>	OPERATING HOURS				
<i>Normalized Quantity*</i> <i>(per year)</i>	2.2	2.8			

*See pages 15-17 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

THE BASIS FOR THIS TARGET WAS A DEVELOPMENT OF A CARBON DIOXIDE RECOVERY PLANT BY ICLP TO RECOVER THE GAS. FLUCTUATIONS IN THE CARBON DIOXIDE MARKET HAS NOT MADE THE PROJECT VIABLE. WE DO NOT SEE A FAVORABLE CARBON DIOXIDE MARKET IN THE NEAR FUTURE SO ICLP WILL BE SUBMITTING A LETTER TO CHANGE ASPECT NUMBER 4 WITHIN 30 DAYS.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section D

Public Outreach and Performance Reporting

D.1 Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements). INDIANTOWN COGENERATION L.P. HAS ALWAYS BEEN COMMITTED TO PUBLIC OUTREACH SINCE THE PLANT'S INCEPTION IN THE LATE 1980s, WITH AN OBLIGATION TO IMPLEMENT A PROGRAM THAT ASSISTS CITIZENS OF THE REGION IN BECOME MORE ENERGY EFFICIENT AND REDUCING THEIR RELIANCE ON FOSSIL FUELS. THESE ACTIVITIES ARE DOCUMENTED ANNUALLY AND A REPORT SUBMITTED TO THE TREASURE COAST REGIONAL PLANNING COUNCIL. ICLP PUBLIC OUTREACH RANGES FROM EMPLOYEES MENTORING AT THE LOCAL SCHOOLS TO BEING A PERMANENT MEMBER OF THE LOCAL CHAMBER OF COMMERCE FOR THE PAST SIX YEARS.

THE YEAR 2001 WAS NO EXCEPTION, IN APRIL 2001 ICLP CELEBRATED EARTH DAY WITH THE ENVIRONMENTAL CLUB OF THE INDIANTOWN MIDDLE SCHOOL. THE CELEBRATION FOCUSED ON ICLP'S SENSITIVITY TO THE ENVIRONMENT AND THE IMPACT OF POWER GENERATION ON OUR NATURAL RESOURCES.

ICLP CONTINUES TO MOVE FORWARD IN IT'S COMMITMENT TO PUBLIC OUT REACH BY PARTNERING WITH SUSTAINABLE MARTIN ALLIANCE TO EXPLORE OPPORTUNITIES RELATED TO ENERGY CONSERVATION EDUCATION.

FINALLY ICLP IS PROUD THAT IN 2001 PLANT EMPLOYEES LOGGED OVER 150 HOURS OF COMMUNITY RELATED ACTIVITIES INCLUDING MENTORING, TRASH PICKUP, PARTICIPATION IN LOCAL FAIRS, SCIENCE PROJECTS AT THE LOCAL SCHOOL, SPONSORING/FUNDING BREAKFAST AND CONDUCTING FUND RAISING ACTIVITIES FOR THE LOCAL CHAMBER OF COMMERCE.

D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

Website (URL WWW.NEG.PGE.COM/SITES_REGIONS/INDIANTOWN.HEML)

Open House

Meetings

Press Releases

Community Advisory Panel

Other

Section E

Self-Certification of Continued Program Participation

On behalf of INDIANTOWN COGENERATION LIMITED PARTNERSHIP,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____

Printed Name Mr./Mrs./Ms./Dr. GEORGE K. "Chip" ALLEN

Title GENERAL MANAGER

Phone Number/E-mail Address 561-597-6500 X 46/

Facility Name INDIANTOWN COGENERATION L.P.

Facility Street Address 13303 SOUTH WEST SILVER FOX LANE

Performance Track Identification Number A04-0028

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

