

JJ → EK

John

February 27, 2003

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Mr. Leonard Kozlov, P.E.
Program Administrator
Florida Department of Environmental Protection
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Subject: Combined Cycle Gas Turbine with Duct Burner, Emissions Unit 088
FDEP Permit No. 0950111-021-AV
January 14, 2003 Emissions Compliance Test while burning natural gas.

Dear Mr. Kozlov:

This letter report is submitted to provide information and supporting data that shows a portion of the January 14, 2003 Annual Emissions Compliance Test produced invalid results due to a malfunctioning NOx analyzer.

The NO₂ to NO converter within the NOx analyzer (identified as Thermo Environmental 42D Analyzer) used to sample the combustion turbine (CT) exhaust was failing and could not convert 90% or more of the sampled NO₂ to NO as required by EPA methodology. The lower than actual NO levels read by this analyzer inflated the calculated duct burner contributions, making it appear that the duct burner NO pounds per hour and NO pounds per million BTU were above permit limits. It is now obvious that the NOx analyzer failure caused erroneous readings. The stack emissions never exceeded permit limits during any portion of the compliance testing.

After extensive consultation with you and your staff, an annual emissions compliance test was rescheduled and performed on February 4, 2003. The results of that testing demonstrated that Emissions Unit 088 is in compliance with all permit limits. The test report for the February 4, 2003 emissions testing will be submitted to FDEP next week.

It is requested that the attached test results from January 14, 2003, be deemed invalid and not suitable for any legitimate purposes. Included with this submission are letters from the Test Team Leader, Charles P. Sneering and Mechanical Engineer, Dagmar Fick of Air Consulting & Engineering, Inc., attesting to the invalid nature of the test results. Attachment A is the certification from the Title V Responsible Official and Attachment B is the letter report.


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If you have any questions or would like additional information, please contact me at (407) 824-4184.

Sincerely,

A handwritten signature in black ink that reads "Bob Kindle". The signature is written in a cursive style with a large, prominent "B" and "K".

Bob Kindle

Regulatory Compliance Administrator
Reedy Creek Energy Services
PO Box 10000
Lake Buena Vista, Florida 32830
(407) 824-4184, Fax (407) 824-4529

BK:BK

cc: Ray Maxwell, RCID District Administrator