

DeSoto County Generating Company, LLC
410 S. Wilmington Street, PEB 9A5
Raleigh, NC 27601

June 16, 2003

Mr. Al Linero
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUN 18 2003

BUREAU OF AIR REGULATION

Dear Mr. Linero:

Re: DeSoto County Generating Company, LLC., DeSoto County Energy Park
Permit No. 0270016-003-AV

0270016-004-AC

0270016-005-AU

This letter requests a revision to permit condition A.22 in the DeSoto County Energy Park's current operating permit and the volatile organic compound emission (VOC) limit units of measure for natural gas. Dialogue with your staff and agency personnel at the Southwest District commented that the department no longer incorporates the language of permit condition A.22 in current permits. Also, a conservative interpretation of the permit condition may result in overly burdensome testing requirements that do not serve in protecting the environment and human health.

The current permit condition language addresses initial and annual compliance testing and specifically defines criteria which trigger the requirement to repeat initial compliance testing. Permit condition A.22 states, specific to initial testing:

Initial (I) tests shall be conducted after any modifications (and shake down period not to exceed 100 days after re-starting the CT) of air pollution control equipment such as change or tuning of combustors.

The current language creates an overly burdensome testing requirement for replacement of like-kind components to the combustion turbine. The annual compliance testing requirement combined with the CEMs for NOx provide compliance assurance for the like-kind equipment maintenance. DeSoto County Generating Company, LLC. requests a revision to the criteria which may trigger the applicability of initial compliance testing to read:

Initial (I) tests shall be conducted after a modification (and shake down period not to exceed 100 days after re-starting the CT) of a combustion turbine.

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The revised language allows deference to the definition of *modification* as defined in Chapter 62-210.200(169). This alleviates the need to interpret *change or tuning of combustors* which may exceed the defined scope of *modification*.

Concerning the VOC emission limit, DeSoto County Generating Company, LLC requests that the units of measure be revised to parts per million volume wet (ppmvw) while operating on natural gas. Analysis of the VOC sample in ppmvw compared to parts per million volume dry (ppmvd) allows for the complete measurement of VOC, due to the portion of VOCs soluble in the sample's moisture. In the current permit the fuel oil emission limit is in the correct units of measure of ppmvw however, the natural gas emission limit is in a ppmvd.

Thank you for your consideration of this request. Please contact Matt Lydon at (727) 826-4152 if you have any questions.

Sincerely,



Robert M. Tanis
Vice President and General Manager
DeSoto County Generating Company, LLC

cc: J. Huron
J. Casco
C. Peterson, SWD