



# Department of Environmental Protection

*File Copy*

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 15, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Mountain  
Environmental Manager  
Central Power & Lime, Inc.  
Post Office Box 1508  
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

Re: Request for an Amendment to the Federal Construction Permit [PSD-FL-090] to Change a Condition of the Testing Authorization Amendment [PSD-FL-090(A)] Issued to Central Power & Lime, Inc.'s Power Plant: PSD-FL-090(Aa)

The Department has reviewed the request that you provided on October 13, 1994 (enclosed), via FAX, which asked for a change/amendment to Condition #11 of the testing authorization [PSD-FL-090(A)] issued October 6, 1994. Based on a review of the files, the request is acceptable and the following will be changed and added:

Condition #11.:

FROM: This Department action is only to authorize the performance tests described above and in the request letter. Any operation above the 100 MW net output level after the last performance test run or the consecutive 96-hours of CEMS data collection is completed will be deemed a violation of the Site Certification No. PA 82-17; and, PSD-FL-090.

TO: This Department action is only to authorize the performance tests described above and in the request letter. Any operations after the conclusion of the testing project that were authorized in PSD-FL-090(A) shall be in accordance with the Site Certification No. PA 82-17 and the federal construction permit No. PSD-FL-090.

Enclosure to be incorporated:

- o Lawrence N. Curtin's letter received October 13, 1994, via the FAX.

Mr. Tom Mountain  
FCSC: Letter Amendment to PSD-FL-090(A)  
PSD-FL-090(Aa)  
December 15, 1994  
Page 2

This letter amendment [PSD-FL-090(Aa)] must be attached to the federal construction permit, No. PSD-FL-090, and shall become a part of the permit.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources Management

HLR/rbm

Enclosure

cc: B. Thomas, SWD  
B. Proses, SWD  
H. Oven, PPS  
J. Harper, EPA  
J. Bunyak, NPS  
D. Beason, Esq., DEP  
C. Hetrick, HCBCC  
A. Cleveland, Esq., OHF&C

*Ready File*

12-16-94 *AM*

**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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(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. Tom Mountain  
 Env. Mgr.  
 Central Power & Light, Inc.  
 P.O. Box 1508  
 Brooksville, FL 34605-1508

4a. Article Number  
 Z 751 860 021

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 12-27-94

5. Signature (Addressee)  
 [Signature]

6. Signature (Agent)  
 [Signature]

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 U.S. GPO: 1992-323-402

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PS Form 3800, March 1993

Sent to Mr. Tom Mountain	
Street and No. Env. Mgr.	
P.O., State and ZIP Code Central Power & Light, Inc.	
Postage P.O. Box 1508	\$
Certified Fee Brooksville, FL 34605-1508	
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TOTAL Postage & Fees	\$
Postmark or Date PSD-FL-090(Aa) Amendment Letter to PSD-FL-090(A) mailed: 12-16-94	

Enclosure

LAW OFFICES

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SPECIAL COUNSEL  
SHAW, LICHTA  
PARENTE, ESERNIO  
& SCHWARTZ, P.C.  
GARDEN CITY, NY  
NEW YORK, NY

## MEMORANDUM

TO: Clair Fancy

FROM: Lawrence N. Curtin

DATE: October 13, 1994

RE: Condition No. 11 -- Letter of October 6, 1994 from Howard Rhodes

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In the letter from Howard Rhodes to Tom Mountain dated October 6, 1994, authorizing the test program at the Central Power & Lime, Inc. cogeneration facility, there is a condition designated as number 11 that is of concern. The condition states that "Any operation above the 100 MW net output level after the last performance test run . . . will be deemed a violation of the Site Certification No. PA 82-17; and PSD-FL-090."

As you are aware, both the PSD permit and the site certification conditions contain limitations on the heat input rate of the facility. Although the heat input rate limitations that were placed in the permits by the Department were an attempt to approximate the heat input that would equal the projected power output, these limitations were never intended to be absolute permit conditions. The projections that the company made concerning the net output that was to be expected from the facility were simply estimates based on the name plate capacity and expected operation. These were not intended to be production rate limitations, and are not stated as such in the site certification or the PSD permit.

Based upon the foregoing, we believe that condition no. 11 is in error and we request that it be modified to reflect that the 100 MW output stated in the letter is not a permit condition.

Let us know if you have any questions.

cc: Tom Mountain

LNC/mml  
TAL-51684

Memorandum

Florida Department of  
Environmental Protection

TO: Howard L. Rhodes  
FROM: *for John Brown*  
Clair Fancy  
DATE: December 15, 1994  
SUBJECT: Amendment Letter to the Federal Construction Permit  
No. PSD-FL-090(A): Central Power & Lime, Inc.  
PSD-FL-090(Aa)

Attached for your approval and signature is a letter amendment [PSD-FL-090(Aa)] that will change Condition #11 of the amendment [PSD-FL-090(A)] that authorized some performance tests on the existing Power Plant. The Power Plant was authorized to construct by the federal construction permit No. PSD-FL-090. The existing facility is located west of Brooksville, Hernando County, Florida. The amendment/change is not controversial.

I recommend your approval and signature.

CHF/BM/rbm

Attachment