



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 26, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas A. Grace
Director - Environmental Health and Safety-
c/o GPU International, Inc.
One Upper Pond Road
Parsippany, New Jersey 07054

Re: Request for Additional Information
DEP File No. 0694801-004-AC (PSD-FL-176A)
Modification of CO Emission Limitation for Lake Cogeneration Limited

Dear Mr. Grace:

On April 21, 2000 the Department received your application for a modification to the air construction permit for Lake Cogeneration Limited. This request is to change the CO limit (from what is represented in the table below) to a facility-wide limit of 42 ppmvd (at 15% O₂) with an annual CO emissions cap of 350 TPY. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Lbs / Hr @ 59°F	Lbs / Hr @ 51°F	Basis	Operating Mode
54.6	56.0	28 ppmvd	CT firing Natural Gas
33.0	34.5	18 ppmvd	CT firing #2 Fuel Oil
36.0	36.0	0.2 lb/MMBtu	DB firing Natural Gas
90.6	92.0		CT + DB firing Natural Gas
TPY = 350.3			

1. Please update the 1991 evaluation of a CO catalyst installation for each unit. That evaluation resulted in a removal cost of \$2700 per ton, which seems high, based upon a recent EPA memorandum dated December 30, 1999.
2. Without the following, the Department is unwilling to accept the statistical analysis provided with the application. The following questions arise as a result of the statistical data and analysis provided:
 - A. 17 data points appear to be represented as the total population for each chart, apparently representing tests from 4 or more sites. The number of data points appears inadequate to draw conclusions, or to ensure that the data is even normally distributed. Please consider using at least 30 (recent) data points and performing a test to ensure that the data is normally distributed at a 98% confidence level. Data should be quality checked (i.e. the test method as well as other controllable factors should be as similar as practical) and data which has special or assignable causes, as well as statistical outliers should be eliminated.
 - B. Unless it can be statistically proven at a high confidence level that the data sets at each site are from the same population (and therefore can be intermingled), all data should be from only the Lake Cogen. site. This is necessary to eliminate any site-to-site variability, which may be the result of differences in permit limits, operation/maintenance practices, fuel type usage, combustor tuning, etc. In the event that the data sets can be statistically proven to represent the same population, please provide that analysis.

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Request for Additional Information
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3. Please provide the most recent two years worth of historical CO emissions. If this data is not considered to be representative, provide CO emissions for every year of post-construction operation, indicating which years are deemed to be representative as well as the accompanying rationale. The Department intends to review past actual operation with proposed future operation as part of this action.
4. Please indicate whether any other (additional) means are available to obtain real offsetting reductions in CO emissions from the facility as a whole.
5. The Department will likely require a CO CEMS unless the permittee can adequately show that it is impractical for this installation.

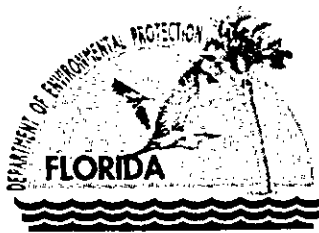
The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call Mike Halpin at 850/921-9530.

Sincerely,

 4/2/00
A. A. Linero, P.E. Administrator
New Source Review Section

AAL/jk

cc: Gregg Worley, EPA
John Bunyak, NPS
Len Kozlov, DEP CD
Ken Kosky, Golder Associates, Inc.



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David B. Struhs
Secretary

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA – Region IV
61 Forsyth Street
Atlanta, Georgia 30303

Re: Lake Cogeneration Permit Amendment Request

Dear Mr. Worley:

Enclosed for your review and comment is an application for the above-mentioned project. It consists of a request to modify the permitted CO limit on both LM-6000 CT's from their current permitted emissions (which are represented in the table below) to a facility-wide limit of 42 ppmvd (at 15% O₂) with an annual CO emissions cap of 350 TPY. The applicant indicates that they are willing to accept a reduction in annual heat input in order to ensure that the annual CO tonnage (potential to emit) does not increase.

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TPY = 350.3			

Your comments can be forwarded to my attention at the letterhead address or faxed to me at (850) 922-6979. If you have any questions, please contact Mike Halpin at (850) 921-9530.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/mph/kt

Enclosures

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Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
April 26, 2000

David B. Struhs
Secretary

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS-Air Quality Division
Post Office Box 25287
Denver, CO 80225

Re: Lake Cogeneration Permit Amendment Request


Dear Mr. Bunyak:

Enclosed for your review and comment is an application for the above-mentioned project. It consists of a request to modify the permitted CO limit on both LM-6000 CT's from their current permitted emissions (which are represented in the table below) to a facility-wide limit of 42 ppmvd (at 15% O₂) with an annual CO emissions cap of 350 TPY. The applicant indicates that they are willing to accept a reduction in annual heat input in order to ensure that the annual CO tonnage (potential to emit) does not increase.

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Sincerely,


A. A. Linero, P.E. Administrator
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