



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

April 22, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kevin Fullerton
Project Manager, Air Programs
Lake Cogen Limited
Post Office Box 2562
Tampa, Florida 33601

Dear Mr. Fullerton:

RE: Amendment to Construction Permit
AC 35-196459 (PSD-FL-176)
NSPS Custom Fuel Monitoring Schedule
Lake Cogen Limited

The Department has reviewed your March 17, 1994 letter, with supporting data, requesting an NSPS Custom Fuel Monitoring Schedule for sulfur dioxide (SO₂) and nitrogen oxide (NO_x) at the subject facility (refer to Attachment No. 1). The facility is required by the permit to comply with Subpart GG of the New Source Performance Standards (NSPS) 40 CFR 60. NSPS 40 CFR 60.334(b) and 60.334(b)(2) of Subpart GG state that for sources utilizing pipeline quality natural gas a custom fuel monitoring schedule, if supported by data which demonstrates compliance with NSPS emission limits, may be approved by the Administrator of EPA. This authority has been delegated to EPA's regional offices and a copy of the subject request was jointly submitted to EPA Region IV for their determination. The Department received a letter from EPA, by fax on April 15, 1994, stating that a custom fuel monitoring schedule for this facility was acceptable if it complied with specific items of a custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987 (Refer to attachment No. 2). Since monitoring data was provided by the applicant which demonstrated compliance with the requirements of 2.a and 2.b in the EPA guidance memo, 2.a and 2.b were deleted from the custom fuel monitoring schedule. In compliance with the EPA determination, the permit specific conditions will be amended as follows:

A. Specific Condition Number;

20. From

This source shall comply with all requirements of 40 CFR 60, Subparts GG and Dc and F.A.C. Rule 17-296.800(2)(a), Standard of Performance for Stationary Gas Turbines and Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Mr. Kevin Fullerton
AC 35-196459 (PSD-FL-176)
Permit Amendment
April 22, 1994
Page 2 of 4

To

This source shall comply with all requirements of 40 CFR 60, Subparts GG and Dc and F.A.C. Rule 17-296.800(2)(a), Standard of Performance for Stationary Gas Turbines and Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. 40 CFR 60.334(b)(2) requires that a custom fuel monitoring schedule shall be followed for natural gas fired at this facility, as follows:

Custom Fuel Monitoring Schedule for Natural Gas

1. Monitoring of fuel nitrogen content shall not be required since natural gas is the only fuel being fired in the gas turbines.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).
 - b. This custom fuel monitoring schedule shall become effective on the date this permit becomes valid. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters. If monitoring data is provided by the applicant which demonstrates consistent compliance with the requirements herein the applicant may begin monitoring as per the requirements of 2(c).
 - c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
 - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall

Mr. Kevin Fullerton
AC 35-196459 (PSD-FL-176)
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be conducted weekly during the interim period when this custom schedule is being re-examined.

4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

B. Attachments to be Incorporated;

- KBN letter received March 21, 1994
- EPA letter received April 15, 1994

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision

Mr. Kevin Fullerton
AC 35-196459 (PSD-FL-176)
Permit Amendment
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of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter amendment must be attached to Construction Permit No. AC 35-196459 (PSD-FL-176), and shall become part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/CSL

Attachments

cc: A. Zahm, CD
J. Harper, EPA
J. Bunyak, NPS
K. Kosky, KBN

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 5/2/94 to the listed persons.

FILING AND AND ACKNOWLEDGMENT FILED,
on this date, pursuant to 120.52(11),
Florida Statutes, with the designated
Department Clerk, receipt of which is
hereby acknowledged.

 5/2/94
Clerk Date

Is your RETURN ADDRESS completed on the reverse side?

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.
- Attach this form to the front of the mailpiece. It is on the back of the piece does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

RECEIVED

MAY 8 1994

Bureau of

Air Regulation

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. Kevin Fullerton
Project Manager, Air Programs
Lake Cogen Limited
Post office Box 2562
Tampa, Florida 33601

4a. Article Number

P 872 563 620

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

MAY -5 1994

5. Signature (Addressee)

6. Signature (Agent)

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

PS Form 3811, December 1991

★U.S. GPO: 1982-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

P 872 563 620



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Mr. Kevin Fullerton	
Street and No. Post Office Box 2562	
P.O., State and ZIP Code Tampa, Florida 33601	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 5/2/94 AC 35-196459	

PS Form 3800, JUNE 1991

Memorandum

Florida Department of
Environmental Protection

TO : Howard Rhodes
FROM : Clair Fancy *CF*
DATE : April 22, 1994
SUBJECT: Approval of Construction Permit Amendment
AC 35-196459 (PSD-FL-176)
Lake Cogen Limited

Attached for your approval and signature is an amendment to a construction permit prepared by the Bureau of Air Regulation for the Lake Cogen Limited Facility. The purpose of this amendment is to specify a custom fuel monitoring schedule for sulfur dioxide and nitrogen oxides in natural gas used as fuel at this facility. As per 40 CFR 60.334(b)(2) the request for a custom fuel monitoring schedule, with data which demonstrated consistent compliance with all the conditions of this permit and 40 CFR 60, Subpart GG, was approved by the Administrator of the U.S. EPA. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/CSL

Attachment



March 17, 1994

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics Management Division
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta GA 30365

Mr. Clair H. Fancy, P.E. Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
MAR 21 1994
Bureau of
Air Regulation

Re: Lake and Pasco Cogeneration Projects
FDEP File Nos. AC35-196459, PSD-FL-176; AC51-196460, PSD-FL-177
NSPS Custom Fuel Monitoring Schedule

Dear Ms. Harper and Mr. Fancy:

This correspondence is submitted on behalf of Lake Cogen Limited and Pasco Cogen Limited to request approval of a custom fuel monitoring schedule for the determination of sulfur content required under the New Source Performance Standards (NSPS) for Stationary Gas Turbines (40 Code of Federal Regulations (CFR) Part 60, Subpart GG). This request is made necessary by Section 60.334(b) and (b)(2) of Subpart GG, which states:

(b) The owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

(2) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with paragraph (b) of this section.

It is my understanding that the U.S. Environmental Protection Agency (EPA) has not delegated the authority to implement Section 60.334(4) to the Florida Department of Environmental Protection (FDEP). Therefore, a copy of this request has been transmitted jointly to EPA Region IV and FDEP.

90115/90116A1/11

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Northwest 57th Street
Gainesville, Florida 32605
904-331-9000
FAX 904-332-4189

5405 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
407-994-9910
FAX 407-994-9393

6821 Southpoint Drive North,
Suite 216
Jacksonville, Florida 32216
904-296-9663 FAX 904-296-0146

One Church Street, Suite 801
Rockville, Maryland 20850
301-738-1100
FAX 301-738-1105



As indicated by Section 60.344(b)(2), the NSPS imply that daily sampling be performed when there is not an intermediate bulk storage tank, even if the fuel is pipeline natural gas. Discussions with EPA's Office of Air Quality Planning and Standards (OAQPS) confirm this interpretation of the rule and offer the attached memorandum as guidance. Specifically, a custom fuel monitoring schedule must be developed and approved for pipeline natural gas. The schedule should address the sulfur content of the fuel; the nitrogen content in natural gas is not required.

The sulfur content for natural gas submitted in the application was developed from data supplied by the natural gas pipeline company in Florida, i.e., Florida Gas Transmission Company (FGT). The data are summarized in Table 1. The emission limit proposed in the application was based on 1 grain sulfur per 100 cubic feet of gas (1 grain/100 cf) which is equivalent to about 0.003 percent sulfur by weight. This sulfur concentration was based on the highest recorded value over the 8-month study period (see Table 1) with a margin of 25 percent (i.e., 0.8 grains/100 cf times 1.25). The pipeline company (i.e., FGT) regularly samples for total sulfur in the natural gas to assure that the hydrogen sulfide content is low and that the concentrations of mercaptan are sufficient for safety reasons. Mercaptan is added to natural gas to assure that the gas has an odor that can be perceived if mistakenly released; otherwise natural gas would have no odor. Please note that the NSPS require that the sulfur content of the fuel be no more than 0.8 percent by weight; a difference of over two orders of magnitude from the basis of the emission limit. Thus, there is significant margin in complying with the NSPS limit.

The EPA guidance memorandum suggests that sampling be conducted twice monthly over the first six months, quarterly over the next six quarters and then during the first and third quarters of each calendar year. The 8 months of data listed in Table 1 (3 to 4 samples per month) demonstrate that the sulfur content meets the NSPS and is less than the basis of the emission limit for natural gas, i.e., 1 grain per 100 cf. FGT was recently contacted and supplied the following data from random analyses:

<u>Analyses Date</u>	<u>Sulfur Content (grains/100cf)</u>
03/10/92	0.50
06/30/92	0.40
09/29/92	0.26
01/05/93	0.31
03/02/93	0.27
06/01/93	0.16
09/28/93	0.12
12/14/93	0.42
02/09/94	0.04

Clearly, the data over that last several years have demonstrated that the NSPS limit is easily met. Thus, it is requested that EPA approve a custom fuel monitoring schedule that requires the facility to submit representative sulfur analyses supplied by the pipeline company each quarter over the first six quarters of turbine operation with the excess emissions report required under Section 60.7(c) of the CFR. After this

Ms. Jewell Harper and Mr. Clair Fancy

March 17, 1994

Page 3



time period, sulfur analyses would be supplied during the first and third quarters of each calendar year. This would provide assurance to EPA and FDEP that the NSPS was being achieved.

Please call if you have any questions.

Sincerely,

Kennard F. Kosky, P.E.
President

KFK/lcb

cc: Kevin Fullerton, Lake Cogen Limited
Bruce Miller, Pasco Cogen Limited
Harry Kerns, FDEP Southwest District
Chuck Collins, FDEP Central District
File (2)

Table 1. Sulfur Content, Heat Content, and SO₂ Emission Factors for Natural Gas

Date	Sulfur Content (gr/100 cf)	Heat Content (Btu)	SO ₂ Emission Factor (lb/10 ⁶ Btu)	SO ₂ Emission Factor (lb/10 ⁶ cf)
2/6/90	0.30	1,031	0.00083	0.857
2/13/90	0.05	1,028	0.00014	0.143
2/20/90	0.35	1,025	0.00098	1.000
2/27/90	0.45	1,024	0.00126	1.286
3/6/90	0.45	1,025	0.00125	1.286
3/13/90	0.30	1,026	0.00084	0.857
3/20/90	0.35	1,026	0.00097	1.000
3/27/90	0.35	1,025	0.00098	1.000
4/3/90	0.60	1,026	0.00167	1.714
4/10/90	0.25	1,022	0.00070	0.714
4/17/90	0.40	1,026	0.00111	1.143
4/24/90	0.30	1,022	0.00084	0.857
5/1/90	0.40	1,020	0.00112	1.143
5/8/90	0.25	1,034	0.00069	0.714
5/15/90	0.20	1,023	0.00056	0.571
6/5/90	0.45	1,020	0.00126	1.286
6/12/90	0.40	1,018	0.00112	1.143
6/19/90	0.70	1,017	0.00197	2.000
6/26/90	0.45	1,019	0.00126	1.286
7/3/90	0.55	1,022	0.00154	1.571
7/10/90	0.35	1,022	0.00098	1.000
7/17/90	0.45	1,021	0.00126	1.286
7/30/90	0.30	1,021	0.00084	0.857
8/7/90	0.50	1,024	0.00140	1.429
8/14/90	0.45	1,022	0.00126	1.286
8/21/90	0.40	1,022	0.00112	1.143
8/28/90	0.70	1,022	0.00196	2.000
9/4/90	0.55	1,029	0.00153	1.571
9/11/90	0.40	1,025	0.00111	1.143
9/18/90	0.45	1,026	0.00125	1.286
9/25/90	0.40	1,026	0.00111	1.143
10/2/90	0.45	1,029	0.00125	1.286
10/9/90	0.45	1,025	0.00125	1.286
10/16/90	0.70	1,028	0.00195	2.000
10/28/90	0.80	1,024	0.00223	2.286
Average:	0.43	1,024	0.00119	1.216
Maximum:	0.80	1,034	0.00223	2.286
Minimum:	0.05	1,017	0.00014	0.143
Std. Dev.	0.15	4	0.00042	0.427

Source: Florida Gas Transmission Company, 1990.

05 07-92 11:45AM FROM EPA FPS/SSCD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 14 1992

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Authority for Approval of Custom Fuel Monitoring
Schedules Under NSPS Subpart GG

FROM: John B. Rasnia, Chief *John B. Rasnia*
Compliance Monitoring Branch

TO: Air Compliance Branch Chiefs
Regions II, III, IV, V, VI and IX

Air Programs Branch Chiefs
Regions I-X

The NSPS for Stationary Gas Turbines (Subpart GG) at 40 CFR 60.334(b)(2) allows for the development of custom fuel monitoring schedules as an alternative to daily monitoring of the sulfur and nitrogen content of fuel fired in the turbines. Regional Offices have been forwarding custom fuel monitoring schedules to the Stationary Source Compliance Division (SSCD) for consideration since it was understood that authority for approval of these schedules was not delegated to the Regions. However, in consultation with the Emission Standards and Engineering Division, it has been determined that the Regional Offices do have the authority to approve Subpart GG custom fuel monitoring schedules. Therefore it is no longer necessary to forward these requests to Headquarters for approval.

Over the past few years, SSCD has issued over twenty custom schedules for sources using pipeline quality natural gas. In order to maintain national consistency, we recommend that any schedules Regional Offices issue for natural gas be no less stringent than the following: sulfur monitoring should

05 07-92 11:45AM FROM EPA FFS/SSCD

TO 29195413470

PG36/007

2

be bimonthly, followed by quarterly, then semiannual, given at least six months of data demonstrating little variability in sulfur content and compliance with §60.333 at each monitoring frequency; nitrogen monitoring can be waived for pipeline quality natural gas, since there is no fuel-bound nitrogen and since the free nitrogen does not contribute appreciably to NO_x emissions. Please see the attached sample custom schedule for details. Given the increasing trend in the use of pipeline quality natural gas, we are investigating the possibility of amending Subpart GG to allow for less frequent sulfur monitoring and a waiver of nitrogen monitoring requirements where natural gas is used.

Where sources using oil request custom fuel monitoring schedules, Regional Offices are encouraged to contact SSCD for consultation on the appropriate fuel monitoring schedule. However, Regions are not required to send the request itself to SSCD for approval.

If you have any questions, please contact Sally M. Farrell at FTS 382-2875.

Attachment

cc: John Cronshaw
George Walsh
Robert Ajax
Earl Salo

05-07-92 11:45AM FROM EPA FPS/SSCD

TO 89195413470

P007/007

Enclosure

Conditions for Custom Fuel Sampling Schedule for Stationary Gas Turbines

1. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).
 - b. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
 - c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
 - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the State Air Control Board of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the State of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

US ENVIRONMENTAL PROTECTION AGENCY
Region IV



TO: Name: CHARLES LOGAN
Company: DEP - Tallahassee
Phone: _____ FAX: 404-622-6979
Date: 4-15-94 Pages (incl. cover) 2

FROM: Air Enforcement Branch Phone: (404) 347-5014
345 Courtland Street, NE
Atlanta, GA 30065 FAX: (404) 347-3059

Sender's Name: MIRZA P. BAIG

Subject: Mulberry / Lake / Paoco Gas Turbine

COMMENTS: Custom Fuel Monitoring Schedules

Dear Charles:

I am faxing you the letter that approves custom fuel monitoring for the above referenced gas turbines.

The hard copy should get to you next week.

If you need anything else please let me know.

Thanks,

Mirza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4APT-AEB

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Approval of NSPS Custom Fuel Monitoring Schedules for:
Mulberry Cogeneration Project, PSD-FL-187 (AC53-211670);
Lake Cogeneration Project, PSD-FL-176 (AC15-196459); and
Pasco Cogeneration Project, PSD-FL-177 (AC51-196460).

Dear Mr. Fancy:

This is to acknowledge letters from KBN Engineering and Applied Sciences, Inc. (KBN) dated March 7, 1994, and March 17, 1994, requesting approval of customized fuel monitoring schedules for the above referenced projects. These requests were jointly transmitted to the U.S. Environmental Protection Agency (EPA), and to you. Since the authority for implementing §60.334(b) of 40 CFR Part 60, Subpart GG has not been delegated to the State of Florida, we have reviewed KBN's custom fuel monitoring schedules.

Based on our review we have determined that the proposed schedules are acceptable, as long as each source also complies with items 2(d), 3, and 4 of the attachment to the custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987. A copy of this memo was included in KBN's request as attachment.

If you have any questions regarding this letter, please contact Mr. Mirza P. Baig of my staff at 404/347-5014.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Jewell A. Harper".

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, & Toxics
Management Division

cc: Kennard F. Kosky
KBN Engineering