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- Print your name and address on the reverse of this form so that we can return this card to you.
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3. Article Addressed to:
 Thomas A. Grace, Mgr.
 Safety & Regulatory Affairs
 Lake Cogen LTD
 One Upper Pond Rd
 Parsippany, NJ 07054

4a. Article Number
 P 265 659 238

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

7. Date of Delivery
 7.7.97

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[Signature]

PS Form 3811, December 1994

Domestic Return Receipt

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P 265 659 238

US Postal Service
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Sent to	Thomas Grace
Street & Number	Lake Cogen
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Postage	\$
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	7-3-97
	0694801-003-AC
	PSD-FI-176

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 3, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas A. Grace
Manager, Safety and Regulatory Affairs
Lake Cogen, LTD.
One Upper Pond Road
Parsippany, NJ 07054

Re: Permit Amendment No. 0694801-003-AC, PSD-FL-176
Lake County Cogen-Combined Cycle Gas Turbine and Steam Generator

Dear Mr. Grace:

The Department is in receipt of your letter dated June 17, 1997 requesting a change to your air construction (PSD) permit. The Department hereby amends the Specific Condition 13 in the subject PSD permit as indicated below. You will need to submit a separate application to our Central District office in order to update your air operating permit and Title V submittal.

Specific Condition No. 13

During performance tests, to determine initial compliance with the NSPS standard for NO_x allowable-NO_x-standard, the measured NO_x emission at 15 percent oxygen will be adjusted to ISO ambient atmospheric conditions by the following correction factor:

$$NO_x = (NO_{x\text{ obs}}) \left(\frac{P_{\text{ref}}}{P_{\text{obs}}} \right)^{0.5} e^{19(H_{\text{obs}} - 0.00633)} \left(\frac{288^\circ K}{T_{\text{amb}}} \right)^{1.53}$$

where:

NO_x = Emissions of NO_x at 15 percent oxygen and ISO standard ambient conditions.

NO_x obs = Measured NO_x emission at 15 percent oxygen, ppmv.

P_{ref} = Reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere) ambient pressure.

P_{obs} = Measured combustor inlet absolute pressure at test ambient pressure.



Department of Environmental Protection

Lawton Chiles
Governor

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

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July 3, 1997

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Manager, Safety and Regulatory Affairs
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$$NO_x = (NO_{x,obs}) \left(\frac{P_{ref}}{P_{obs}} \right)^{0.5} e^{19(H_{obs} - 0.00633)} \left(\frac{288^\circ K}{T_{amb}} \right)^{1.53}$$

where:

NO_x = Emissions of NO_x at 15 percent oxygen and ISO standard ambient conditions.

NO_x obs = Measured NO_x emission at 15 percent oxygen, ppmv.

P_{ref} = Reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere) ambient pressure.

P_{obs} = Measured combustor inlet absolute pressure at test ambient pressure.

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Printed on recycled paper.

Hobs = Specific humidity of ambient air at test.

e = Transcendental constant (2.718).

T_{amb} = Temperature of ambient air at test (°K).

Subsequent annual compliance tests conducted to establish compliance with NOx limits that are more stringent than the NSPS standard [Table 1] shall not require an ISO correction or testing at four load points; rather, the testing shall be done at capacity, as defined above. However, when testing shows that NOx emissions exceed the standard when operating at capacity, the company shall recalibrate the NOx emission control system using emission testing at four loads as required in Subpart GG.

A person whose substantial interests are affected by this permit amendment may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9730, fax: 850/487-4938. Petitions must be filed within fourteen days of receipt of this permit amendment. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this permit amendment. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the

Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

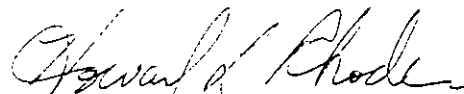
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permit amendment is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit amendment will not be effective until further order of the Department.

When the Order (Permit Amendment) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Howard L. Rhodes".

Howard L. Rhodes, Director
Division of Air Resources
Management

Mr. Thomas A. Grace
Page 5
July 3, 1997

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this AMENDMENT was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7-3-97 to the person(s) listed:

Mr. Thomas A Grace, Lake Cogen, LTD. *
Mr. Len Kozlov, CD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(7), Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

Luni Johnson 7-3-97
(Clerk) (Date)

Mr. Thomas A. Grace
Page 5
July 3, 1997

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receipt of which is hereby acknowledged.

Luni John 7-3-97
(Clerk) (Date)

Memorandum

Florida Department of Environmental Protection

KIM

TO: Howard L. Rhodes

THRU: Clair Fancy *act for CHP*
Al Linero *adlin 7/2*

FROM: Marty Costello *MC*

DATE: July 2, 1997

SUBJECT: Lake Cogen, LTD. PSD-FL-176
FINAL Permit Amendment No. 0694801-003-AC

Attached for approval and signature is a letter that will amend the above referenced permit to clarify that the ISO correction factor and testing at four loads only applies to demonstration of compliance with the NSPS standard for NO_x. This change has been made in several cases and is based on Guidance Document No. DARM-EM-05 entitled Guidance On Rate of Operation During Compliance Testing For Combustion Turbines, dated 11/22/95.

I recommend your approval and signature.

FAX

Date 07/3/97

Number of pages including cover sheet 6

TO: Mr. Thomas A. Grace

Phone (201) 263-6913

Fax Phone (201) 263-6848

FROM: New Source Review
Section
Florida DEP
2600 Blair Stone Road
Tallahassee, Florida
32399-2400

Phone (850) 488-1344

Fax Phone (850) 922-6979

CC:

REMARKS: ☐ Urgent ☒ For your review ☐ Reply ASAP ☐ Please Comment

Mr. Grace,

Following is the modification to your air construction permit for 0694801-003-AC, PSD-FL-176.
Please call me if there is any transmission problem with this fax at the above phone number.

Heather Hinst

LAKE COGEN, LTD.

NCP LAKE POWER, INC., GENERAL PARTNER

283189

One Upper Pond Road
Parsippany, NJ 07054
Telephone (201) 263-6950
Facsimile (201) 263-6977

June 17, 1997

Mr. Al Linero
Florida Department of Environmental Protection
Bureau of Air Quality
2600 Blair Stone Road
Mail Station 5505
Tallahassee, Florida 32399-2400

RECEIVED

JUN 25 1997

**BUREAU OF
AIR REGULATION**

Dear Mr. Linero:

AIRS I.D.# 0694801-003-AC

RE: Lake Cogen Limited, Construction Permit No. AC 35-196459 and Permit
to Operate No. AO 35-248140 - Minor Permit Modification Request

As the Authorized Representative for the Lake Cogen facility, I am submitting this letter requesting several minor changes to the facility's Construction Permit, Permit to Operate, and Title V Operating Permit application. This letter is the result of several conversations and meetings I have had recently with our Plant Manager, Mr. Buck Oliver, Mr. Anatoliy Sobolevskiy of Central Region and Mr. Martin Costello of your staff. The changes are basically administrative in nature and reflect issues that have been previously addressed in the Department's Guidance Document DARM-EM-05, "Guidance on Rate of Combustion During Compliance Testing for Combustion Turbines".

The issues that we want to address include the following:

1. Per Operating Permit Specific Condition for Compliance Determination - No. 3:

a. Delete reference to the operation requirements for firing on natural gas or fuel oil under ISO conditions, as shown in "mark-up". This is no longer necessary.

2. Per Operating Permit Specific Condition for Compliance Determination - No. 10:

a. Delete language that requires source testing at either 30, 50, 75 and 100 % of peak load, or at four points in the normal operating range of the gas turbine, and instead, only be required to comply with special condition 13, in which testing is only required within the 90 to 100% rated capacity range of the units.

b. Delete language that requires the ISO correction adjustment. This is no longer necessary.

c. Delete the requirement to perform source testing for VOCs. Per condition, this is only required if the CO emission limit is not met during the annual source test. Consequently, VOC emissions must be reviewed only as a

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MAIL ROOM
JUN 23 97

secondary test, if and when CO emissions are found to be greater than allowed, and not as an annual requirement..

d. Request a short term variance from the Department with regard to the July 15, 1997 date for annual compliance testing, until the changes to the permit requested in this letter are finalized.

3. Per Operating Permit Specific Condition for Compliance Determination - No. 11, and Construction Permit Specific Condition for Compliance Determination - No. 13:

a. Condition refers to adjustment of Nox emissions to ISO conditions and includes the calculation for doing such. This entire condition is requested to be deleted. This condition was met with the initial source test and is no longer necessary for the facility.

4. Per Operating Permit Specific Condition for Compliance Determination - No. 12:

a. Delete language requiring the permittee to have a pre-test meeting with the Department prior to conducting the source test.. We agree with the Department that having the pre-test meetings are a good practice and beneficial, but these are not based upon a regulatory requirement and therefore should not be included as a special condition under the operating conditions for the permit.

5. Per Operating Permit Specific Condition for Compliance Determination - Table 1A:

a. Delete language from the Allowable Emissions Table that concerns limits based upon ISO conditions. The Table would then have lb/hr and TPY limits solely based upon one maximum allowable limit standard.

The Lake Cogen facility successfully completed its initial source testing in which testing at the four load points and corrected to ISO conditions for comparison with the NSPS allowable was performed. This was done in 1994. Per paragraph four of the Departments Guidance Document DARM-EM-05, "Guidance on Rate of Operation During Compliance Testing for Combustion Turbines", subsequent annual compliance testing conducted to establish compliance with Nox limits at the Lake Cogen facility should no longer require ISO correction, or testing at the four load points.

As indicated in 1.d. above, we would like to have the Department's approval to delay the annual source test pending resolution of these issues. As instructed by Mr. Costello, by way of this letter, I will go back to Central District and request a postponement of the source test for three months, from July 15, 1997 to October 15, 1997. If additional time is required to amend the permits, an additional postponement period will be requested.

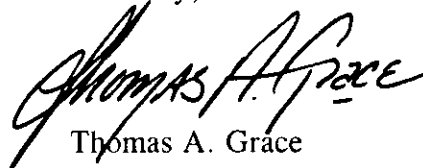
A set of "marked up" permits, a copy of guidance document DARM-EM-05, and a review fee check for \$250.00 are included with this submittal. Due to the need to get on with the annual source test for the Lake Cogen facility I would respectfully request that the Department expedite these modifications in as expedient a manner as possible.

In lieu of amending the permits at this time, an alternative that allows Lake Cogen to proceed with the annual source test in a timely manner would be a letter from the Department that either:

1. provides a one-time approval to conduct source testing at capacity and without correcting to ISO conditions, while the Department takes the time necessary to review and amend the facility permits; or,
2. provides approval to conduct annual source tests at capacity and without correcting to ISO conditions until such time that the facility's Title V operating permit incorporates these changes and is issued.

If you have any questions or require additional information, please feel free to contact me at any time. My telephone number is (201) 263-6913.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas A. Grace".

Thomas A. Grace

Manager, Safety and
Regulatory Affairs

w/attachments

cc: J. McTear
B. Oliver
A. Sobolevskiy - FLDEP Central Region
C. Shine - FLDEP Central Region
M. Costello - FLDEP Tallahassee office
File: 273-2010.4



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL
P 248 041 685

Nations Bank of Florida, National Association
600 Peachtree Street, NE
Suite 900
Atlanta, Georgia 30309

Attention: L. Collins Proctor, Trust Officer

Lake County - AP
Lake Cogen Facility
Combined Cycle Gas Turbine Cogeneration Facility

Dear Mr. Proctor:

Enclosed is a revised Permit Number AO35-248140 to operate the above referenced source, issued pursuant to Section(s) 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit 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, within 14 days of receipt of this permit. 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 constitutes 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 and (g) a statement of the relief sought by petitioner, stating precisely the action 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 permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 notice in the Office of General Counsel at the above address of the Department. Failure to petition

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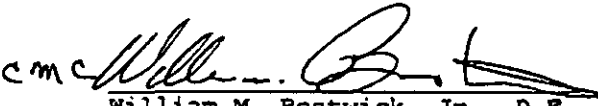
request a hearing under Section 120.57, F.S. , and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for extension of time, this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



William M. Bostwick, Jr., P.E.
Acting District Director

DATE: 3/30/95

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


Clerk

3/30/95
Date

WMB/hhj


CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were
mailed before the close of business on 3/30/95 to the listed
persons by, D. Jones.



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

Permittee:
Nations Bank of Florida, National Association
600 Peachtree Street, NE
Atlanta, Georgia 30308

Attention: L. Collins Proctor, Trust Officer

Permit Number: A035-248140
Date of Issue: 3/30/95
Expiration Date: November 4,
1999
County: Lake
Latitude/Longitude:
28° 55' 02"N / 81° 40' 37"W
UTM: 17-434.0 KmE; 3198.6 KmN
Project: Combined Cycle Gas
Turbine Cogeneration Facility

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 296, and 297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate a Combined Cycle Gas Turbine Cogeneration Facility. The facility consists of two nominal 42 megawatt (MW) combustion turbines, with exhaust through heat recovery steam generators (HRSG) which are used to power a nominal 26.5 MW steam turbine. The facility utilizes natural gas as the primary fuel, with distillate oil as the emergency backup fuel. Nitrogen oxide emissions from this facility are controlled by water injection.

This emission unit is located adjacent to the Golden Gem Citrus Processing Plant, at the intersection of State Road 19 and Golden Gem Road in Umatilla, Lake County, Florida.

General Conditions are attached to be distributed to the permittee only.

GEN. CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

GENERAL CONDITIONS:

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
1. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
2. This permit or a copy thereof shall be kept at the work site of the permitted activity.
3. This permit also constitutes:
 - (X) Determination of Best Available Control Technology (BACT)
 - (X) Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of compliance with state Water Quality Standards (Section 401, PL 92-500)
 - (X) Compliance with New Source Performance Standards
4. The permittee shall comply with the following:
 - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 1. the date, exact place, and time of sampling or measurements;
 2. the person responsible for performing the sampling or measurements;
 3. the dates analyses were performed;
 4. the person responsible for performing the analyses;
 5. the analytical techniques or methods used;
 6. the results of such analyses.
5. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Permittee: Nations Bank of FL,
National Association
Attention: L. Collins Proctor,
Trust Officer

I.D.
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SPECIFIC CONDITIONS

OPERATING CONDITIONS

1. This source is permitted to operate continuously (8,760 hours per year) [Pursuant to permit application].
2. This source is permitted to use natural gas as the primary fuel and distillate oil as the emergency backup fuel (limited as shown in Specific Condition No. 3 below) [Pursuant to permit application].
3. The permitted materials and utilization rates for this source are as follows [Pursuant to 3/10/94 amendment to AC35-196459]:

Maximum distillate fuel oil consumption shall not exceed either of the following limitations - 2,921 gal/hr/CT; 701,050 gal/yr/CT

Maximum annual firing using distillate fuel oil shall not exceed an equivalent of 10 days (240 hours) per year at full load.

Maximum sulfur (S) content in the oil shall not exceed 0.1 percent by weight.

Maximum heat input based on the lower heating value (LHV) while burning natural gas, shall not exceed 423 MMBtu/hr/CT at 51°F ~~or 403 MMBtu/hr/CT when corrected to 150 conditions~~. The maximum heat input, based on the LHV while burning distillate fuel oil, shall not exceed 424 MMBtu/hr/CT at 51°F ~~or 406 MMBtu/hr/CT when corrected to 150 conditions~~.

Duct firing shall be limited to natural gas firing only, with a maximum heat input of 90 MMBtu/hr based on the higher heating value (HHV) of approximately 1054.5 Btu/ft³.

Duct firing shall be limited to 525,000 MMBtu/year/HRSG-duct burner.

4. Any change in the method of operation, equipment or operating hours which affects air emissions shall be submitted to the Department's Bureau of Air Regulation and the Central Florida District office for prior approval.
5. Any other operating parameters established during compliance testing and/or inspections, that will ensure the proper operation of this facility, are considered part of this operating permit. Said operating parameters include, but are not limited to: Fuel flow rate, heat input rate and water to fuel ratio.
6. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor [Rule 62-296.320(2), F.A.C.].

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7. This source must be properly operated and maintained [Rule 62-210.300(2), F.A.C.]. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly [Rule 62-210.650, F.A.C.].

EMISSION LIMITS

8. The maximum allowable emissions from this facility shall not exceed the emission rates listed in Table 1A, which is attached to, and is a part of, this permit [Pursuant to 3/10/94 amendment to AC35-196459].
9. Visible emissions shall never exceed 20 percent opacity, and the CT shall not exceed 10 percent opacity during full load except as provided in Rule 62-210.700, F.A.C.

COMPLIANCE DETERMINATION

10. Compliance with the NO_x , SO_2 , CO and visible emission standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A (July 1, 1990) and adopted by reference in Rule 62-297, F.A.C.
- a. Method 9 - Visible Emissions
 - b. Method 10 - Determination of the Carbon Monoxide emissions from Stationary Sources
 - c. Method 20 - Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent emissions from Stationary Gas Turbines
 - d. Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer

Compliance with the total volatile organic compound emission limits will be assumed, provided that the CO allowable emission rate is achieved; specific VOC compliance testing is not required.

Compliance tests shall be conducted on an annual basis on or within 60 days prior to July 15 for each parameter marked (A) in the following table:

} - short term
variance
requested
pending
resolution
of permit
Request
deletion of
VOC's

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PARAMETER	TEST METHOD
NO _x (A)	Method 20* with results in pounds per million Btu. Stack connected to the ISO connection equation in Specific Condition 17 of this permit. Temperature and humidity of the air leaving the boiler will be substituted for ambient temperature and humidity (outside inlet air) in the ISO correction equation.
SO ₂ (A)	SO ₂ emission rate will be calculated using fuel analysis data. Gas analysis will be done using ASTM D1072-80, D3031-81, D4084-82 or D3246 to analyze for sulfur content of gaseous fuels.
VOC (A)	Method 25A. VOC will be tested simultaneously with NO_x, CO and VE at maximum load. Not required if CO limit is met.
CO (A)	Method 10. CO will be tested simultaneously with NO _x , VOC and VE at maximum load. Tests will be conducted for CT only, and CT plus DB. CO test will be three test runs, with each test run to be a minimum of one hour as required by 62-297.310(1) and 62-297.330(1) (a)
Metal Analysis	Metal Analysis will be accepted from the August 1993 test.
VE (A)	Method 9. Two, one-hour VE tests while firing gas at maximum load. One hour with DB on, one hour with DB off. VE readings will be taken simultaneously with tests for NO _x , CO and VOC.

Delete

Delete

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PARAMETER	METHOD OF DETERMINATION
Fuel Type	Natural Gas.
Btu Per Pound of Fuel (A)	Fuel Analysis both low and high. Btu input for CT calculated using lower heating value. Btu input for DB calculated using higher heating value.
CO ₂ and O ₂ (A)	Method 3/3A/20 to be used to measure oxygen for all test conditions.
Ambient temperature, pressure and humidity (A)	Temperature and humidity of the air leaving the chiller (turbine inlet air) will be recorded by the stack test team. This is in addition to the data recorded by the computer. Pressure will be measured as ambient pressure.
30, 50, 75 and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range of peak load, as referenced in 40 CFR 60.335 (c) (2), Subpart GG	Peak load based on Btu input will be established in kilowatts determined on the day of the test. Multiple load testing for NO_x will be performed in accordance with 40 CFR 60.335 (c) (2).

} Delete

* The emission test sampling points will be selected in accordance with 6.1.2.4 of Method 20, which states - Select the eight sampling points at which the lowest O₂ concentrations or highest CO₂ concentrations were obtained - . If the difference between the highest and the lowest measured oxygen concentrations in the stack is less than 0.4% oxygen by volume, it may be assumed that stratification does not exist.

~~11. During performance tests to determine compliance with the proposed standard, measured NO_x emission at 15% oxygen will be adjusted to ISO ambient atmospheric conditions by the following correction factor, as found in 40 CFR 60.335 (c) (2), Subpart GG.~~

} Delete

~~$$NO_x = (NO_{x \text{ obs}}) (P_{\text{amb}}/P_{\text{obs}})^{0.1} e^{1.5 (H_{\text{obs}} - 0.00633 (2000/T_{\text{amb}})) 1.53}$$~~

~~where,~~

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~~NO_x = Emissions of NO_x at 15 percent oxygen and ISO standard ambient conditions~~

~~(NO_x obs) = Measured NO_x emission at 15 percent oxygen, ppmv~~

~~P_{ref} = Reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere ambient pressure)~~

~~P_{obs} = Reference combustor inlet absolute pressure at test ambient pressure~~

~~H_{obs} = Specific humidity of ambient air at test (turbine inlet air-ambient air)~~

~~e = Transcendental constant (2.718)~~

~~T_{amb} = Temperature of ambient air at test (turbine inlet air-ambient air).~~

Delete

12. The permittee shall notify the Central District office of the Department of Environmental Protection, in writing, at least 15 days prior to the date on which each formal compliance test is to begin. Said notification shall include the date, time and place of each such test, as well as the name of the contact person who will be responsible for coordinating and having such tests conducted for the owner. The Department may waive the 15 day notice requirement on a case by case basis [Rule 62-297.340(1)(i), F.A.C.]. ~~The permittee shall also at that time schedule a pre-test meeting with the Central District office to review the compliance test procedures required by this permit and 40 CFR 60 Code of Regulations.~~

Delete

13. A copy of the compliance test results shall be submitted to the Department's Central District office within 45 days after the last test run is complete. The test run should provide the actual heat input rate, and at least all of the information listed in Rule 62-297.570(3), F.A.C. Failure to submit any of the above information may invalidate a test. [Rule 62-297.570 and 62-4.070(3), F.A.C.] 16. Testing of emissions shall be conducted with the source operating at 90% to 100% of rated capacity. The source may be tested at less than 90% of rated capacity; however subsequent source operation is limited to 110% of the tested load until a new test is conducted and approved by the Department in writing. Once the source is so limited, operation at higher capacities, not to exceed rated capacity, is allowed for a cumulative total of no more than 15 successive calendar days for purposes of additional compliance testing to regain permitted capacity, with prior notification to the Department [Rule 62-4.070(3), F.A.C.]
14. The stack sampling facility must comply with Rule 62-297.345, F.A.C., regarding minimum requirements that include but are not limited to: location of sampling ports, work platform area hand rails and toe rails, caged ladder or fall arresters, access and electrical power.

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15. A continuous monitoring system shall be utilized to monitor and record the water and fuel consumption on each unit, as well as the ratio of water to fuel being fired in each unit. Water injection shall be utilized for NO_x control. The water to fuel ratios at which annual compliance was achieved, shall be incorporated into this permit and shall be continuously monitored. The system shall meet the requirements of 40 CFR Part 60, Subpart GG.

The permittee shall provide the Central District office with the model number of the continuous monitoring system within 30 days of the date of issue of this operating permit.

16. Combustion control shall be utilized for CO control. The permittee shall leave a space suitable for installation of an oxidation catalyst [Pursuant to 3/10/94 Amendment to AC35-196459].
17. To determine compliance with the capacity factor condition for oil firing, the permittee shall maintain daily records of fuel usage. All records shall be maintained for a minimum of two years after the date of each record, and shall be made available to authorized representatives of the Department upon request.
18. Sulfur, nitrogen content and lower heating value of the fuel being fired in the gas turbine shall also be recorded per fuel oil shipment as required in 40 CFR 60 Subpart GG. These records shall be kept by the company for at least two years, and shall be made available for inspection by authorized representatives of the Department.
19. Excess emissions resulting from startup or shutdown are be permitted provided that best operational practices to minimize emissions are adhered to, and the duration of excess emissions is minimized. Excess emissions resulting from malfunction are permitted provided that best operational practices to minimize emissions are adhered to, and the duration of excess emissions is minimized, but in no case exceeds two hours in any 24-hour period unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction, are prohibited [Rule 62-210.700, F.A.C.].

In the event that the permittee is temporarily unable to comply with any of the conditions of the permit, the permittee shall immediately notify the Department's Central District Office. Notification shall be conducted in accordance with General Condition (8) of this permit. In case of excess emissions resulting from malfunctions, a full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department [Rules 62-210.700(6) and 62-4.130, F.A.C.].

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The permittee shall submit, to the Department, a written report of emissions in excess of the emission limiting standard as set forth in Rule 62-296.405(1)(a), F.A.C. for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the permittee of the legal liability for violations. All recorded data shall be maintained on file for a period of at least two years. The information supplied in this report consistent with the reporting requirements of 40 CFR 60.7. The report shall be submitted within 30 days following the end of the calendar quarter [Rules 62-297.500(2) and 62-4.070(3), F.A.C.].

RULE REQUIREMENTS

20. This source shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapter 62-4, Florida Administrative Code.
21. This source shall comply with all requirements of 40 CFR 60, Subparts GG and Dc, and Rule 62-296.800(a), F.A.C., Standards of Performance for Stationary Gas Turbines, and Standards of Performance for Industrial, Commercial and Institutional Steam Generating Units.
22. This source shall comply with Rule 62-297, F.A.C., Stationary Point Source Emission Test Procedures.
23. Pursuant to Rule 62-210.300, F.A.C., Air Operating Permits, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. These reports shall include, but are not limited to, the following: sulfur, nitrogen content and lower heating value of the fuel being fired, fuel usage, hours of operation and air emissions. Annual reports shall be sent to the Department's Central District office. Each calendar year, on or before March 1, an Annual Operations Report, DEP Form 62-210.900(4) must be submitted for the preceding calendar year.
24. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 62-297 or any other requirements under federal, state or local law. Additional regulations may impact this facility at some future date. The permittee shall comply with any applicable future regulations when they become effective [Rule 62-210.300, F.A.C.].
25. The application to renew this operating permit shall be submitted to the Central District office of the Department of Environmental Protection at least 60 days prior to the expiration date of this permit [Rules 62-4.050(2) and 62-4.090(1), F.A.C.].

Table 1A. Lake Cogen Limited Allowable Emission limits

Pollutant	Source ^a	Fuel ^b	Basis of Limit	Allowable Emission Limits			
				at 59°F	Maximum Allowable at 51°F ^(e)		
				lb/hr TPY	lb/hr (c)	TPY ^(d)	
NO _x ^{le}	CT	NG	BACT: 25 ppmvd at 15% O ₂	82.7	391.6	85.5	404.7
	CT	DFO	BACT: 42 ppmvd at 15% O ₂	143.9	148.3	148.3	
	DB	NG	BACT: 0.1 lb/MMBtu	18.0	18.0	18.0	
	CT&DB	NG		100.7	103.5	103.5	
CO	CT	NG	BACT: 28 ppmvd	54.6	350.3	56.0	350.3
	CT	DFO	BACT: 18 ppmvd	33.0	34.5	34.5	
	DB	NG	BACT: 0.2 lb/MMBtu	36.0	36.0	36.0	
	CT&DB	NG		90.6	92.0	92.0	
PM/PM10	CT	NG	BACT: 0.0065 lb/MMBtu	5.0	27.0	5.0	27.0
	CT	DFO	BACT: 0.026 lb/MMBtu	20.0	20.0	20.0	
	DB	NG	BACT: 0.006 lb/MMBtu	2.6	2.6	2.6	
	CT&DB	NG		7.6	7.6	7.6	
SO ₂	CT	DFO	Estab. by Applicant 0.1% S	80.0	21.0	87.6	21.0
VOC	CT	NG	Established by Applicant	3.3	30.8	3.4	30.8
	CT	DFO	Established by Applicant	8.3	8.7	8.7	
	DB	NG	Established by Applicant	5.4	5.4	5.4	
	CT&DB	NG		8.7	8.8	8.8	
Mercury(Hg)	CT	DFO	Established by Applicant	0.0003	--	--	0.0003
Lead(Pb)	CT	DFO	Established by Applicant	0.0008	--	--	0.0008
Beryllium(Be)	CT	DFO	Established by Applicant	0.0002	--	--	0.0002
Sulfuric Acid Mist	CT	DFO	Established by Applicant	0.80	--	--	0.80

^a CT = 2 combustion turbines, DB = 2 duct burners

^b NG = natural gas, DFO = distillate fuel oil

~~^c NO_x limits for 59°F are at 60% relative humidity (ISO conditions)~~

(c) ^d Compliance with the Maximum Allowable Emission Limits shall be demonstrated for CT limits and CT&DB limits.

(d) ^e The Maximum Allowable TPY of emissions, based on a worst case scenario, are the sum of the CT emissions while firing NG for 355 days, the CT emissions while firing DFO for 10 days, and DB emissions at the maximum heat input for the previous combinations of CT firing. The DB will only fire NG and only while the CT is firing NG.

(e) ^f These are the Maximum Allowable Emission Limits shall never be exceeded at any temperature and/or operating configuration.

Note: All temperatures cited in this table refer to turbine inlet temperatures.


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STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

c m c 
William M. Bostwick, Jr., P.E.
Acting District Director

ISSUED: 3/30/95

Heathers copy

LAKE COGEN, LTD.
NCP LAKE POWER, INC., GENERAL PARTNER

One Upper Pond Road
Parsippany, NJ 07054
Telephone (201) 263-6950
Facsimile (201) 263-6977

June 17, 1997

Mr. Al Linero
Florida Department of Environmental Protection
Bureau of Air Quality
2600 Blair Stone Road
Mail Station 5505
Tallahassee, Florida 32399-2400

RECEIVED

JUN 26 1997

**BUREAU OF
AIR REGULATION**

Dear Mr. Linero:

0694801-003-AC

RE: Lake Cogen Limited, Construction Permit No. AC 35-196459 and Permit
to Operate No. AO 35-248140 - Minor Permit Modification Request

As the Authorized Representative for the Lake Cogen facility, I am submitting this letter requesting several minor changes to the facility's Construction Permit, Permit to Operate, and Title V Operating Permit application. This letter is the result of several conversations and meetings I have had recently with our Plant Manager, Mr. Buck Oliver, Mr. Anatoliy Sobolevskiy of Central Region and Mr. Martin Costello of your staff. The changes are basically administrative in nature and reflect issues that have been previously addressed in the Department's Guidance Document DARM-EM-05, "Guidance on Rate of Combustion During Compliance Testing for Combustion Turbines".

The issues that we want to address include the following:

1. Per Operating Permit Specific Condition for Compliance Determination - No. 3:

a. Delete reference to the operation requirements for firing on natural gas or fuel oil under ISO conditions, as shown in "mark-up". This is no longer necessary. ✓

2. Per Operating Permit Specific Condition for Compliance Determination - No. 10:

a. Delete language that requires source testing at either 30, 50, 75 and 100 % of peak load, or at four points in the normal operating range of the gas turbine, and instead, only be required to comply with special condition 13, in which testing is only required within the 90 to 100% rated capacity range of the units. ✓

b. Delete language that requires the ISO correction adjustment. This is no longer necessary. ✓

c. Delete the requirement to perform source testing for VOCs. Per condition, this is only required if the CO emission limit is not met during the annual source test. Consequently, VOC emissions must be reviewed only as a ?

secondary test, if and when CO emissions are found to be greater than allowed, and not as an annual requirement..

d. Request a short term variance from the Department with regard to the July 15, 1997 date for annual compliance testing, until the changes to the permit requested in this letter are finalized. ← ?

~~2.~~ 3. Per Operating Permit Specific Condition for Compliance Determination - No. 11, and Construction Permit Specific Condition for Compliance Determination - No. 13:

a. Condition refers to adjustment of Nox emissions to ISO conditions and includes the calculation for doing such. This entire condition is requested to be deleted. This condition was met with the initial source test and is no longer necessary for the facility. ✓

4. Per Operating Permit Specific Condition for Compliance Determination - No. 12:

a. Delete language requiring the permittee to have a pre-test meeting with the Department prior to conducting the source test.. We agree with the Department that having the pre-test meetings are a good practice and beneficial, but these are not based upon a regulatory requirement and therefore should not be included as a special condition under the operating conditions for the permit. ✓

5. Per Operating Permit Specific Condition for Compliance Determination - Table 1A:

a. Delete language from the Allowable Emissions Table that concerns limits based upon ISO conditions. The Table would then have lb/hr and TPY limits solely based upon one maximum allowable limit standard. ✓

The Lake Cogen facility successfully completed its initial source testing in which testing at the four load points and corrected to ISO conditions for comparison with the NSPS allowable was performed. This was done in 1994. Per paragraph four of the Departments Guidance Document DARM-EM-05, "Guidance on Rate of Operation During Compliance Testing for Combustion Turbines", subsequent annual compliance testing conducted to establish compliance with Nox limits at the Lake Cogen facility should no longer require ISO correction, or testing at the four load points.

As indicated in 1.d. above, we would like to have the Department's approval to delay the annual source test pending resolution of these issues. As instructed by Mr. Costello, by way of this letter, I will go back to Central District and request a postponement of the source test for three months, from July 15, 1997 to October 15, 1997. If additional time is required to amend the permits, an additional postponement period will be requested.

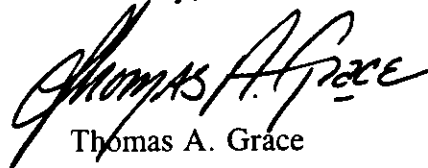
A set of "marked up" permits, a copy of guidance document DARM-EM-05, and a review fee check for \$250.00 are included with this submittal. Due to the need to get on with the annual source test for the Lake Cogen facility I would respectfully request that the Department expedite these modifications in as expedient a manner as possible.

In lieu of amending the permits at this time, an alternative that allows Lake Cogen to proceed with the annual source test in a timely manner would be a letter from the Department that either:

1. provides a one-time approval to conduct source testing at capacity and without correcting to ISO conditions, while the Department takes the time necessary to review and amend the facility permits; or,
2. provides approval to conduct annual source tests at capacity and without correcting to ISO conditions until such time that the facility's Title V operating permit incorporates these changes and is issued.

If you have any questions or require additional information, please feel free to contact me at any time. My telephone number is (201) 263-6913.

Sincerely,



Thomas A. Grace

Manager, Safety and
Regulatory Affairs

w/attachments

cc: J. McTear
B. Oliver
A. Sobolevskiy - FLDEP Central Region
C. Shine - FLDEP Central Region
M. Costello - FLDEP Tallahassee office
File: 273-2010.4