



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 26, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary Lambert
Executive Vice President
CPV Gulfcoast, Ltd
35 Braintree Hill Office Park, Suite 107
Braintree, Massachusetts 02184

Re: DEP File No. 1110101-001-AC (PSD-FL-312)
Proposed Combined Cycle Power Plant

Dear Mr. Lambert:

On December 29, 2000 the Department received your application and complete fee for an air construction permit for a combined cycle power plant near Port St. Lucie in St. Lucie County. 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

Please submit the following information:

1. Power Augmentation: Average emission estimates appear to be based on 2000 hours per year of power augmentation. Please advise how many hours the unit will actually operate in that mode based on conditions in Florida and other technical considerations.
2. Determine what actual emissions typically occur during power augmentation (especially for CO). We have found that emissions during gas and oil firing are typically around 1 ppm for new units and much less than manufacturer guarantees. However we do not have any information obtained while such units operate in power augmentation mode. There should be information available through GE, although we recognize that their guarantees may not be negotiable at this point. If the unit operates full time in power augmentation mode, oxidation catalyst begins to appear more cost-effective based on the assumption that emissions will actually be 15 ppm under that mode.
3. Refer to EPA's letter dated December 27, 2000 for the CPV Gulfcoast project. Since these two projects are identical, please submit a response to each question related to the BACT-CO cost analysis.

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4. Our Southeast District used ArcView and Coordinate-corrected OrthoQuads to review the Lat/Long in ARMS. They estimate the coordinates to be: N: 27 deg, 21 min, 32 sec; W: 80 deg, 24 min, 43 sec. Please double check your estimates and reconcile and compare with the UTM values in the application. It could be that our estimates are wrong.
5. Please provide the BPIP input file on disk or by computer.
6. The comments from the National Park Service are as follow: "Given the emissions (126 TPY of NO_x, 76 TPY of SO₂, and 103 TPY of PM₁₀) and the distance (180 km) from Everglades to the source location, we do not have any concerns that this source will have potential impacts on AQRVs at Everglades NP."
7. We will send you the comments from EPA Region IV as soon as they are received.

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. 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 me at 850/921-9519. Matters regarding modeling issues should be directed to Cleve Holladay (meteorologist) at 850/921-8986 and e-mail cleve.holladay@dep.state.fl.us. Matters regarding the technical information may be directed to Teresa Heron at 850/921-9529 and e-mail teresa.heron@dep.state.fl.us

Sincerely,



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

AAL/th

cc: Gregg Worley, EPA
John Bunyak, NPS
Isidore Goldman, SED
Scott Sumner, P.E., TRC

