ECT
Environmental Consulting & Technology, Inc.

July 31, 2001

SENT VIA OVERNIGHT MAIL ON JULY 31, 2001

Mr. A.A. Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

Re: El Paso Merchant Energy Company
DEP File No. 0810199-AC (PSD-FL-318)
Manatee Energy Center – New 600 MW Gas Turbine Power Plant

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), the following information is provided regarding the EPMEC Manatee Energy Center (MEC) Air Construction Permit Application submitted to the Department in March 2001:

Item 1. Emergency Generator Diesel Engine

The MEC will include a 2,600-horsepower (HP) emergency diesel-fired electrical generator. EPMEC requests that the Department's draft PSD permit include a condition limiting annual diesel fuel usage for the 2,600-HP emergency diesel-fired electrical generator to no more than 32,000 gallon per year such that the diesel engine qualifies for the categorical permit exemption of Rule 62-210.300(3)(a)20., F.A.C. A revised Air Construction Permit Application, Appendix C, potential emission inventory worksheet for the 2,600-HP emergency diesel-fired electrical generator is attached.

Item 2. Emergency Fire Water Pump Diesel Engine

The MEC will include a 250-HP emergency diesel-fired fire water pump. This diesel engine qualifies for the categorical permit exemption of Rule 62-210.300(3)(a)21., F.A.C..

Item 3. Emergency Diesel Engine Fuel Storage Tanks

As noted above, the MEC will include a 2,600-HP emergency diesel-fired electrical generator and a 250-HP emergency diesel-fired fire water pump. Each of these emergency diesel engines will include a small (i.e., less than 1,000 gallon) diesel fuel storage tank. Emissions of volatile organic compounds (VOCs) from each small diesel fuel oil storage tank will well below the potential emission thresholds of Rule 62-210.300(3)(b), F.A.C. The emergency diesel engine diesel fuel

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storage tanks therefore qualify for an exemption from permitting pursuant to Rule 62-210.300(3)(b), F.A.C.

Your continued expeditious processing of the EPMEC Manatee Energy Center permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 if there are any further questions regarding this permit application.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachment

cc: Mr. Krish Ravishankar, EPMEC
Mr. Bill Thomas, FDEP Southwest District
Ms. Karen Collins-Fleming, Manatee CHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, National Park Service

POTENTIAL EMISSION INVENTORY WORKSHEET

EPMEC Manatee Energy Center

EG-ENG

EMISSION SOURCE TYPE

DIESEL ENGINES - CRITERIA POLLUTANTS

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Stationary Diesel Engine
Emission Control Method(s)/ID No.(s):	None
Emission Point Description:	2,600 HP Emergency Generator Diesel Engine

EMISSION ESTIMATION EQUATIONS

Emission (lb/hr) = Emission Factor (lb/hr)

Emission (ton/yr) = Emission Factor (lb/hr) x Operating Period (hrs/yr) x (1 ton/ 2,000 lb)

Source: ECT, 2000.

INPUT DATA AND EMISSIONS CALCULATIONS

Operating Hours:	175	hrs/yr	
Fuel Flow:	28,324	gal/yr	
Fuel Flow:	161.9	gal/hr	
Diesel Fuel Oil Sulfur Content:	0.05	weight %	
Diesel Fuel Oil Heat Content:	141,000	Btu/gal (HHV)	
Heat Input:	22.82	MMBtu/hr (HHV)	

Criteria Pollutant	Emission Factor (lb/hr)	Potential Emission Rates (lb/hr)	Potential Emission Rates (tpy)
NO_x	37.24	37.24	3.26
CO	8.34	8.34	0.73
TOC	2.05	2.05	0.18
SO_2	0.820	0.82	0.07
PM	1.380	1.38	0.12
PM_{10}	1.380	1.38	0.12

SOURCES OF INPUT DATA

Parameter	Data Source
Operating Hours (annual)	EPMEC, 2001.
Fuel Flow Rate (gal/yr)	ECT, 2001.
Emission Factors (all except TOC)	ECT, 2001.
Emission Factor (TOC)	AP-42, Table 3.4-1, EPA, October 1996.

NOTES AND OBSERVATIONS

DATA CONTROL

Data Collected by:	K. Ravishankar	Date:	Jul-01
Data Entered by:	T.Davis	Date:	Jul-01
Reviewed by:	K. Ravishankar	Date:	Jul-01

ECT
Environmental Consulting & Technology, Inc.

June 26, 2001

SENT VIA OVERNIGHT MAIL ON JUNE 26, 2001

Mr. A.A. Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

Re: Response to Request for Additional Information Dated April 27, 2001
DEP File No. 0810199-AC (PSD-FL-318)
Manatee Energy Center – New 600 MW Gas Turbine Power Plant

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), responses to the issues raised in your April 27, 2001 correspondence concerning the Manatee Energy Center permit application are provided as follows:

Item 1. FPPSA Requirements, Steam-Electrical Capacity, and Power Augmentation

The steam turbine generator (STG) planned for the Manatee Energy Center (MEC) combined cycle (CC) unit will have a maximum generating capacity of 120 megawatts (MW). The CC unit will have a modern distributed control system (DCS) that will serve as a means to control STG operation utilizing plant instrumentation and equipment. In conjunction with the steam turbine governor, a control management system will be implemented that will limit the STG output to less than 75 MW. The power output of the STG will be recorded on the plant DCS for records purposes and reporting needs as required. The CC unit will feature hardware provisions that will allow diversion of steam produced by the heat recovery steam generator (HRSG) from the STG thereby limiting its output. The main hardware features that will limit STG electrical output include CTG steam mass flow augmentation, STG controls, and a STG steam bypass system. Each of these systems is described in the following sections.

A. CTG Steam Mass Flow Augmentation

- The CC unit CTG will incorporate steam injection nozzles and design features that will allow a portion of the high-pressure steam generated by the HRSG to be diverted from the STG to the CTG. This introduction of steam to the CTG allows for a mass flow enhancement. The increased mass flow that results from steam injection will increase CTG output as well as fuel consumption. At ambient temperatures of about 50°F or less, steam mass flow augmentation will be limited by CTG equipment limitations. For instance, CTG backpressure could increase to levels beyond those recommended by the vendor. At these colder ambient temperature conditions, steam injection into the CTG will be curtailed and alternate means of steam diversion from the STG will be called on to a greater extent.

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- The specifics of the limitations on CTG steam injection will be developed by the CTG vendor. Additionally, the specifics of steam introduction will be developed in conjunction with the CTG control systems for proper coordination with the dry low-NO_x (DLN) combustor control algorithms.

- Steam flow to the CTG steam injection nozzles, including CTG control integration, will be controlled from a signal generated within the DCS. This control signal will operate a control valve that regulates steam flow by modulation of the valve seat or opening area thereby allowing steam flow modulation.

- Steam flow to the CTG injection nozzles will be measured with classical steam flow measurement devices such as an orifice plate or an annubar. The steam flow measurement device will have a differential pressure transmitter attached to pressure sensing lines that will monitor the process and produce a proportional 4-20 milliamp (ma) signal that will tie in to the plant DCS. This signal will be converted to flow and signals will be transmitted to the CTG combustion control systems as well as to the balance of the plant DCS. During base load operations, the steam flow to the CTG injection nozzles will likely be a fixed steam mass flow or fixed percent of CTG mass flow. Injection of steam will occur at 100 percent load only. During upsets/startups and conditions such as low ambient temperatures, the steam flow will be controlled to coordinate with CTG combustion control to allow stable operation and avoid surge and stall within the CTG. During these periods, alternate STG steam diversion paths will be used.

B. Steam Turbine Generator (STG) Controls

- The STG will be fitted with an electronic governor and control system that will control the steam flow into the STG and hence the STG electrical output. Additional instrumentation will be used to adjust this control loop. For instance, condenser back pressure, intermediate pressure and low pressure steam flows, steam temperatures and pressure will each have a significant impact on the determination of the proper steam flow to the STG.

- The primary measurement of STG electrical output will be the main input to the STG governor control loops. This power measurement will be feed to the STG governor to compare to the primary set point. As an example, the primary set point may have a value of 74.9 MW. Following control system tuning, the set point will be adjusted to allow for control swings and upsets such that the hourly STG electrical production average will never exceed 75 MW.

C. STG Steam Bypass System

- Whenever steam to the CTG injection nozzles and to all other locations are not sufficient to reduce STG output to the set point, the primary means of final control will be a STG steam bypass system. The STG steam bypass system will allow steam flow from the HRSG to bypass the STG and "dump" directly into the condenser. The DCS will generate a final control signal that will modulate this steam dump. A CC plant typically

includes this hardware to allow for steam dumping during upsets or malfunctions. Additional control signals and associated hardware will regulate this dump steam as the final means of disposal of excess HRSG steam. In addition, an economizer bypass system may be used to reduce the flow of water passing through the economizer stage of the HRSG, which will reduce the flow of steam produced.

The control systems described above will typically scan each instrument every second and recalculate and update the status and driving signals going to each field device. Following control system tuning, the control systems will regulate STG output to the required level.

As noted above, steam mass flow augmentation will be only be used at 100 percent load and when ambient air temperatures are above approximately 50°F. EPMEC plans to operate the MEC CC unit to provide base load electrical power. The maximum annual hours of steam mass flow augmentation will therefore primarily depend on ambient temperatures as well as electrical power demand. At a 68°F CTG inlet air temperature and 100 percent load, steam mass flow augmentation will increase CTG electrical output by approximately 12.8 MW.

Item 2. Emissions During Steam Mass Flow Augmentation

The emissions data provided with the submitted permit application represent the CTG vendor's (General Electric) estimate performance with respect to emission rates; reference Appendix B of the permit application dated March 2001. This vendor data indicates that CO exhaust concentrations during steam mass flow augmentation will not exceed 12 ppmvd, corrected to 15% O_2. Because CTG vendors typically include some margin on their estimated emission rates, the vendor data is considered to provide reasonable assurance that CO exhaust concentrations during steam mass flow augmentation will not exceed 12 ppmvd, corrected to 15% O_2.

The CO exhaust concentration expected during steam mass flow augmentation for the MEC CC CTG is lower than the limits contained in recent Department permits for combustion turbine projects utilizing steam mass flow augmentation. For example, the July 2000 CO BACT permit limit for Gulf Power Company's Lansing Smith Plant Unit 3 (also a GE 7FA CC unit) is 23 ppmvd at 15 percent oxygen with steam mass flow augmentation. The draft Department permit for Calpine's Blue Heron Project, issued in February 2001, proposes a CO BACT limit of 17 ppmvd at 15 percent oxygen during steam mass flow augmentation. The Department's April 2001 draft permit for the CPV Atlantic combustion turbine power project specifies a CO BACT limit of 15.0 ppmvd at 15 percent oxygen with steam mass flow augmentation.

Item 3. Capacity and Emissions

Maximum heat input, volumetric flow rate, exhaust gas exit temperature, and CTG power output at 100 percent load, 59°F CTG compressor inlet temperature, and without steam mass flow augmentation are provided in the following table for simple and combined cycle modes of operation.

Operating Mode	Heat Input, LHV (MMBtu/hr)	Flow Rate (acfm)	Exit Temperature (°F)	Power Output (MW)
Simple Cycle	1,668	2,427,702	1,120	170.9
Combined Cycle	1,668	998,405	190	169.0

Your April 27, 2001 correspondence also requested maximum heat input, volumetric flow rate, exhaust gas exit temperature, and CTG power output at partial loads (i.e., less than 100 percent load), 59°F CTG compressor inlet temperature, and with steam mass flow augmentation. As discussed above in Item 1., steam mass flow augmentation will only be used at 100 percent load.

CO, NO_x, PM/PM_{10}, and VOC emission rates at 100 percent load, 59°F CTG compressor inlet temperature, and without steam mass flow augmentation are provided in the following table for simple and combined cycle modes of operation.

Air Pollutant	Simple Cycle		Combined Cycle	
	(ppmvd)[a]	(lb/hr)	(ppmvd)	(lb/hr)
CO	7.4	29.0	7.4	29.0
NO_x	9.0	58.0	3.5	22.6
PM/PM_{10}	N/A	18.3[b]	N/A	19.0[b]
VOC	1.3	2.8[c]	1.3	2.8[c]

[a] Corrected to 15 percent oxygen.
[b] As measured by EPA Reference Methods 201A and 202.
[c] Non-methane, non-ethane VOCs expressed as methane equivalents.

Your April 27, 2001 correspondence also requested CO, NO_x, PM/PM_{10}, and VOC emission rates at partial loads (i.e., less than 100 percent load), 59°F CTG compressor inlet temperature, and with steam mass flow augmentation. As discussed above in Item 1., steam mass flow augmentation will only be used at 100 percent load.

Item 4. Fuel Heaters

The MEC will include one, 12.8 MMBtu/hr (HHV) gas-fired natural gas fuel heater that uses water as the heat transfer medium. This heater is exempt from permitting pursuant to Rule 62-210.300(3)(a)2., F.A.C., categorical exemption for individual hot water heaters rated at less than 100 MMBtu/hr burning annually no more than 150 MM ft^3/yr of natural gas. At a natural gas heat content of 1,020 MMBtu/ft^3 (HHV) and 8,760 hrs/yr operation, the MEC gas-fired natural gas fuel heater will burn 109.9 MM ft^3/yr of natural gas. Note that NSPS Subpart Dc, applicable to new steam generating units (including units which heat water or any other heat transfer medium) greater than 10 MMBtu/hr heat input, does not contain any emission limitations for natural gas-fired units.

Item 5. Relaxation of Restrictions on Pollutant Emitting Capacity

Any future modification to the MEC, as well as future modifications to any other facility in Florida, will be subject to the permitting requirements that are applicable at the time of the modification. The extent of permitting required will depend on the nature of the modification and the permitting requirements in effect at the time of the modification. Accordingly, conclusions with respect to the permitting requirements for future modification projects cannot be drawn without knowledge of the specifics of the future modification project and the permitting procedures that will be in effect at the time of the modification.

A professional engineer certification pursuant to Rule 62-4.050(3), F.A.C. is attached. Your continued expeditious processing of the MEC permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 if there are any further questions regarding the MEC permit application.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachment

cc: Mr. Krish Ravishankar, EPMEC
Mr. Bill Thomas, FDEP Southwest District
Ms. Karen Collins-Fleming, Manatee CHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, National Park Service

El Paso Merchant Energy Company
Manatee Energy Center

Professional Engineer Certification

Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the information provided to the Department regarding the El Paso Merchant Energy Company's proposed Manatee Energy Center is in accordance with all applicable Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of air pollutants not regulated for an emissions unit, based solely upon the materials, information and calculations provided with this certification.

Thomas M. Davis — 6/26/01

Signature — Date

(seal)

* Certification is applicable to the information provided in response to the Department's April 27, 2001 request for additional information regarding the proposed El Paso Merchant Energy Company's Manatee Energy Center.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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, or on the back if space 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.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. William Mack
Senior Managing Director
El Paso Merchant Energy Co.
Coastal Tower, None Greenway Pl
Suite 1682A
Houston, TX 77046-0995

4a. Article Number
7099 3400 0000 1450 2491

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

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PS Form **3811**, December 1994 102595-98-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

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CERTIFIED MAIL RECEIPT
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Article Sent To:
Mr. William Mack

Postage	$
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Name (Please Print Clearly) (to be completed by mailer)
El Paso Merchant Energy Co.
Street, Apt. No.; or PO Box No.
Coastal Tower, 9 Greenway Pl, Ste1682A
City, State, ZIP+4
Houston, TX 77046-0995

PS Form 3800, July, 1999 See Reverse for Instructions

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 27, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Mack
Senior Managing Director
El Paso Merchant Energy Company
Coastal Tower, Nine Greenway Plaza, Suite 1682A
Houston, Texas 77046-0995

Re: DEP File No. 0810199-AC (PSD-FL-318)
Manatee Energy Center-600 MW Cogeneration Plant

Dear Mr. Mack:

The Department has conducted a completeness review of the Manatee Energy Center's application received on March 28, 2001 for installation of a 600 megawatt new facility to be located one mile N.E. of Buckeye Road and U.S. Highway 41 in Piney Point. Please provide responses to our comments and questions as follows:

Your application states the steam electric turbine associated with the HSRG will be less than 75 MW, however an exact number was not provided. We need reasonable assurance that this new project is not an electrical power plant as defined in the Florida Electrical Power Plant Siting Act.

POWER AUGMENTATION

- Power augmentation will allow the firing of additional natural gas while injecting water/steam into the turbine, to produce more megawatts. Explain the overall operation in the power augmentation mode. How much more power output is due to operation in the power augmentation mode (only). Will the steam turbine be sized for less than 75 MW capacity? Provide reasonable assurance that the steam turbine is not capable of exceeding 75 MW through its design by the steam turbine manufacturer. Provide a schematic of the power augmentation operation mode. What is the maximum manufacturer's recommended period (hr/year, hr/month) for operation in the power augmentation mode. 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 (PAM). There should be information available through GE, although we recognize that their guarantees may not be negotiable at this point. Provide reasonable assurance that the proposed limit under the power augmentation mode will not exceed 12 ppmvd @ 15 % O_2.

3. **Capacity and Emissions.** Please provide the following information:

   - Maximum heat input (mmBTU per hour), volumetric flow rate (acfm), exhaust gas exit temperature (in °F), and power output (MW) without power augmentation at 100% load and a compressor inlet temperature of 59° F.

   - Maximum heat input (mmBTU per hour), volumetric flow rate (acfm), exhaust gas exit temperature (in °F), and power output (MW) at >100% load with power augmentation and a compressor inlet temperature of 59° F.

- CO, NOx, PM/PM10, and VOC emission rates without power augmentation at 100% load and a compressor inlet temperature of 59° and based on General Electric's emissions performance estimates.
- CO, NOx, PM/PM10, and VOC emission rates with power augmentation at >100% load and a compressor inlet temperature of 59° and based on General Electric's emissions performance estimates.

4. **Fuel Heaters.** Does this project include any gas-fired natural gas fuel heaters? If so, please provide the maximum heat input and emission rates (lb/hour and tons per year).

5. **Relaxations of Restrictions on Pollutant Emitting Capacity.** You have requested up to 5000 hours of operation for each simple cycle gas turbine. At this level, it appears that a high-temperature SCR system (NOx control) and an oxidation catalyst system (CO control) may not be cost effective. However, any permit issued pursuant to this request will include a requirement to operate in simple cycle mode only. In addition, future conversion of any unit to combined cycle operation will invoke the source obligation requirements of Rule 62-212.400(2)(g), F.A.C. and the modification will be reviewed as if the simple cycle units had never been constructed with a new determination of the Best Available Control Technology for each significant pollutant.

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. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information. *Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application*

We will forward any comments from the Department of Interior and EPA Region IV as soon as they are received. If you have any questions regarding this matter, please contact Teresa Heron (review engineer) at 850/921-9529 or Cleve Holladay (meteorologist) at 850/921-8986.

Sincerely,

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

AAL/th

cc: Gregg Worley, EPA
John Bunyak, NPS
Bill Thomas, SWD
Karen Collins-Fleming, Director, Manatee County
Thomas W. Davis, PE.

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 3, 2001

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

RE: Facility ID No. 0810199-001-AC, PSD-FL-318
Manatee Energy Center

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for El Paso Merchant Energy Company to construct and operate a new electric power generating plant in Manatee County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact Teresa Heron, review engineer, at 850/921-9529.

Sincerely,

Patty Adams

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/pa

Enclosure

cc: Teresa Heron

EL PASO ENERGY

March 26, 2001

Mr. A. A. Linero, P.E.
Administrator, New Source Review Section
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400

Re: El Paso Merchant Energy Company
Manatee Energy Center
Air Construction Permit Application
0810199-001-AC PSD-FL-318

Dear Mr. Linero:

El Paso Merchant Energy Company (EPMEC) is planning to construct, own, and operate a new electric power generating plant in Manatee County, Florida. The new power plant, designated as the Manatee Energy Center (MEC), will be a combustion turbine generator (CTG) facility comprised of one combined cycle (CC) CTG with a nominal generating capacity of 250 megawatts (MW) and two simple cycle (SC) CTGs, each with a nominal generating capacity of 175 MW. The CC unit will consist of one nominal 175 MW CTG, one unfired heat recovery steam generator, and one steam turbine generator constrained to generate less than 75 MW. Total MEC generating capacity will be a nominal 600 MW. The MEC CTGs will be fired exclusively with natural gas. MEC will be located in Manatee County approximately 0.6 miles northeast of Buckeye Road and U.S. Highway 41.

Seven copies of an Application for Air Permit – Title V Source, together with a check in the amount of $7,500 as payment of the required permit processing fee, are enclosed for your review. Three of the applications include a CD-ROM containing the dispersion modeling files. Your expeditious processing of the EPMEC air permit application will be appreciated. Please contact me at 713/877-7023 if there are any questions.

Sincerely,

EL PASO MERCHANT ENERGY COMPANY

K. Ravishankar

Krish Ravishankar
Environmental Manager

cc: Ms. Karen Collins, Manatee County DEM
J. Huron
Enclosures
C. Holladay
B. Thomas, SWD
EPA
NPS