

REEDY CREEK ENERGY SERVICES, INC.

RECEIVED

FEB 26 1997

BUREAU OF
AIR REGULATION

25 February, 1997

Mr. A. A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: Reedy Creek Improvement District
Central Energy Plant-Combustion Turbine Modification
Permit Number 0950110-001**

Dear Mr. Linero:

Please find enclosed proof of publication from the *Orlando Sentinel* of the public notice for the referenced permit modification. Please call me if you have any questions.

Sincerely,

Edward Godwin, P.E.
Chief Mechanical Engineer, RCES

Attachment

cc: Ken Kosky, P.E.
Bob Kindle
Elaine Potusky

cc: C. Holladay
M. Costello

The Orlando Sentinel

Published Daily

\$535.60

BEST AVAILABLE COPY

State of Florida } S.S.
COUNTY OF ORANGE

Before the undersigned authority personally appeared BEVERLY C. SIMMONS, who on oath says that he/she is the Legal Advertising Representative of The Orlando Sentinel, a daily newspaper published at ORLANDO in ORANGE County, Florida; that the attached copy of advertisement, being a PUBLIC NOTICE OF in the matter of FILE NO. 0950110 -002-AC in the ORANGE Court, was published in said newspaper in the issue of 02/13/97

Affiant further says that the said Orlando Sentinel is a newspaper published at ORLANDO in said ORANGE County, Florida, and that the said newspaper has heretofore been continuously published in said ORANGE County, Florida,

each Week Day and has been entered as second-class mail matter at the post office in ORLANDO County, Florida, ORANGE for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

The foregoing instrument was acknowledged before me this 14th day of FEBRUARY, 19 97, by BEVERLY C. SIMMONS, who is personally known to me and who did take an oath.

ROSALBA ROSALLO
My Comm Exp. 7/13/98
Bonded By Service Ins
No. CC392006
Personally Known **1102-1.D.**

INTENT TO ISSUE
AIR CONSTRUCTION PERMIT
AMENDMENT
STATE OF FLORIDA
DEPARTMENT OF

ENVIRONMENTAL PROTECTION
DRAFT Permit
Amendment No.: 0950110-002-AC

Change of Combustors on 38 MW Gas-Turbine at Reedy Creek Improvement District Orange County. The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit amendment to Reedy Creek Improvement District (RCID), for new extended venturi combustors for its existing 38 MW Gas Turbine located at its Central Energy Plant in Lake Buena Vista, Orange County. A Best Available control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21. Prevention of significant Deterioration (PSD). The change of combustors will result in actual increases of the following pollutants: nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO2), particulate matter (PM/PM10) and volatile organic compounds (VOC). These increases are less than the applicable PSD significant emission rates; therefore, PSD requirements do not apply. The amendment will not result in an increase in any allowable emissions from the facility, and will not cause a violation of state or federal air quality standards or increments. Applicant's name and address: Reedy Creek Improvement District, P.O. Box 10000, Lake Buena Vista, Florida 32830-1000.

The amendment makes the following changes: permitted allowable NOx emissions will be reduced by 57 tons per year to 280 tons per year; the CO emission limit for peak load of 11 pounds per hour is removed since PSD applicability and maximum CO emissions are based on 25 pounds per hour and 110 tons per year, RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize NOx and CO control, and the intent of a condition specifying testing requirements subsequent to the initial compliance test will be clarified. The new venturi combustors will offer better performance, less maintenance, and a longer life span. In addition CO emissions will be controlled by the installation of a state-of-the-art oxidation catalyst. The catalyst will provide assurance that the actual maximum increase in CO emissions that will be associated with this modification will remain below the current permit emission limit.

The Department will issue the FINAL Permit Amendment, in accordance with the conditions of the DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a difference decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of the Notice. Any written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Amendment with the conditions of the DRAFT Permit Amendment unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline

for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set

Reedy Creek
2/26/97

person to file a petition (or a request for mediation, as discussed below) 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 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 Department's action or proposed action addressed in this notice of intent.

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 notice of intent. 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, 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

Reedy Creek
2/26/97

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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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of
Environmental Protection
Central District
3319 Maguire Boulevard, Suite
232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

The complete project file includes the Draft Permit Amendment, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

COR1367750 FEB. 13, 1997

The Orlando Sentinel

Published Daily

\$535.60

State of Florida } S.S.
COUNTY OF ORANGE

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JUANITA ROSADO
My Comm Exp. 7/13/98
Bonded By Service Ins
No. CC392006
[] Personally Known [] Other & D.

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

ENVIRONMENTAL PROTECTION
DRAFT Permit
Amendment No.: 0950110-002-AC

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for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision 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: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. 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 (or a request for mediation, as discussed below) 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 motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

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Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

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COR1367750 FEB. 13, 1997

DELIVER
PICK-UP
SHIP
HOLD AT GATE

DELIVERY OR SHIPPING NOTICE

NO. _____

DATE 2/25/97

P.O. NO. _____
or REF. _____

SHIPPER:

- DISNEY DEVELOPMENT COMPANY**
6649 WESTWOOD BLVD., ORLANDO, FL 32821
- REEDY CREEK IMPROVEMENT DISTRICT**
P.O. BOX 101175 LAKE BUENA VISTA, FL 32830
- VISTA UNITED TELECOMMUNICATIONS**
P.O. BOX 10180 LAKE BUENA VISTA, FL 32830
- WALT DISNEY WORLD CO.**
P.O. BOX 10000 LAKE BUENA VISTA, FL 32830-1000
(407) 824-2222
- WALT DISNEY WORLD PARK PRINTING**
7481 PRESIDENT'S DRIVE, ORLANDO CENTRAL PARK
ORLANDO, FL 32809
- LAKE BUENA VISTA COMMUNITIES INC.**
P.O. BOX 10000 LAKE BUENA VISTA, FL 32830
- REEDY CREEK ENERGY SERVICES (CEP)**

TO:

Mr. A.A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

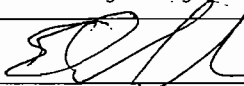
PHONE # _____

VIA Overnight - Best Way		SHIPPING CHARGES <input checked="" type="checkbox"/> Prepaid <input type="checkbox"/> Collect						
DATE REQUIRED AT DESTINATION February 26, 1997 (Wednesday)		ORIGIN	ACCOUNT			REVENUE AND COST CONTROL		
		6 9	3	1	1	3	5 3	
						0 0	J DVE01CA	
ITEM	QUANTITY	DESCRIPTION OF ITEMS					INVENTORY ITEM CODE	VALUE
1	1	Envelope - Letter						
NO. OF PIECES		TOTAL WEIGHT					TOTAL VALUE	\$

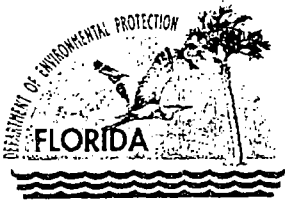
REQUESTED BY: Ed Godwin

RECEIVED THE ABOVE GOODS IN SATISFACTORY
CONDITION EXCEPT AS NOTED

DEPARTMENT: Planning & Engineering

AUTHORIZED BY: 

RECEIVED BY _____ DATE _____



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 22, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William O'Toole
Senior Vice President
Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32380-1000

Re: Revised DRAFT Permit Amendment No. 0950110-002-AC
Reedy Creek Improvement District

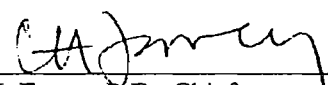
Dear Mr. O'Toole:

Enclosed is one copy of the Revised Draft Air Construction Permit Amendment for the Reedy Creek Improvement District's 38 MW gas turbine located at its Central Energy Plant in Lake Buena Vista, Orange County, Florida. The Department's Intent to Issue Air Construction Permit Amendment and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Cleve Holladay or Mr. Linero at 904/488-1344.

Sincerely,


C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/ch

Enclosures

*Chair - This is 2
re-issue of public
notice package. You
have seen this -
OK*

File - Review

P 265 659 151

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sender Edward Godwin	
Street & Number Reedy Creek	
Post Office, State, & ZIP Code LBU, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	1-23-97
0950110-002-AC	

PS Form 3800, April 1995

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:

Edward Godwin, PE
 Reedy Creek Improve. Dis.
 PO Box 10,000
 Lake Buena Vista, FL
 32380-1000

4a. Article Number

P 265-659-151

4b. Service Type

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

7. Date of Delivery

1/27/97

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X

[Signature]

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

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

BUREAU OF
AIR REGULATION

FEB 03 1997

RECEIVED



P 265 659 152

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to <i>William O'Jole</i>	
Street & Number <i>Reedy Creek ID</i>	
Post Office, State, & ZIP Code <i>LBU, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>1-23-97</i>
<i>0950110-002-AC</i>	

PS Form 3800 April 1995

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:
William O'Jole, Sr. VP.
Reedy Creek Improve. Dist.
PO Box 10,000
Lake Buena Vista, FL
32380-1000

4a. Article Number
P 265 659 152

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

7. Date of Delivery
1/27/97

5. Received By: (Print Name)

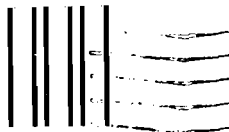
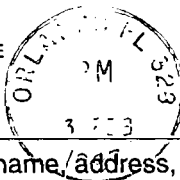
8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X

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Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

BUREAU OF
AIR REGULATION

FEB 06 1977

RECEIVED



In the Matter of an
Application for Permit Amendment by:

Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32380-1000 /

DRAFT Permit Amendment No.: 0950110-002-AC
38 MW Gas Turbine at Reedy Creek
Orange County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit amendment (copy of DRAFT Permit amendment attached) for the proposed project, as detailed in the application specified above, for the reasons stated below.

The applicant, Reedy Creek Improvement District, applied on October 23, 1996, and December 16, 1996, to the Department for an air construction permit amendment [to replace existing combustors with new extended venturi combustors] on its existing 38 MW gas turbine located at the Central Energy Plant in Lake Buena Vista, Orange County. The amendment makes the following changes: permitted allowable nitrogen oxides emissions will be reduced by 57 tons per year to 280 tons per year; actual CO emissions will be allowed to increase but permitted allowable emissions will remain the same, except that the peak load emission limit of 11 pounds per hour will be removed since Prevention of Significant Deterioration (PSD) applicability and permitted maximum CO emissions are based on 25 pounds per hour and 110 tons per year; and the intent of a condition specifying testing requirements subsequent to the initial compliance test will be clarified.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit amendment is required to commence or continue operations at the described facility.

The Department intends to issue this air construction permit amendment based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT". The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 904/488-1344; Fax 904/ 922-6979) within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment pursuant to Rule 62-103.150 (6), F.A.C.

The Department will issue the FINAL Permit Amendment, in accordance with the conditions of the enclosed DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT." Any written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

The Department will issue the permit amendment with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., or a party requests mediation as an alternative remedy under Section 120.573 F.S. before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision 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: 904/488-9730, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. 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 (or a request for mediation, as discussed below) 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 addressed in this notice of intent.

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 notice of intent. 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.

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.

Executed in Tallahassee, Florida.


C. H. Fancy, P.E., Chief
Bureau of Air Regulation

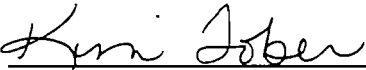
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT (including the PUBLIC NOTICE, and DRAFT permit amendment) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1-23-97 to the person(s) listed:

Mr. William O'Toole, RCID *
Mr. Edward Godwin, P.E., RCID *
Mr. Ken Kosky, P.E, Golder Associates
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Dennis Nester, OCEPD

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.


(Clerk) 1-23-97
(Date)

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Amendment No.: 0950110-002-AC
Change of Combustors on 38 MW Gas Turbine at Reedy Creek Improvement District
Orange County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit amendment to Reedy Creek Improvement District (RCID), for new extended venturi combustors for its existing 38 MW Gas Turbine located at its Central Energy Plant in Lake Buena Vista, Orange County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The change of combustors will result in actual increases of the following pollutants: nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM/PM₁₀) and volatile organic compounds (VOC). These increases are less than the applicable PSD significant emission rates; therefore, PSD requirements do not apply. The amendment will not result in an increase in any allowable emissions from the facility, and will not cause a violation of any state or federal ambient air quality standards or increments. The applicant's name and address are: Reedy Creek Improvement District, P.O. Box 10000, Lake Buena Vista, Florida 32830-1000.

The amendment makes the following changes: permitted allowable NO_x emissions will be reduced by 57 tons per year to 280 tons per year, the CO emission limit for peak load of 11 pounds per hour is removed since PSD applicability and maximum CO emissions are based on 25 pounds per hour and 110 tons per year, RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize NO_x and CO control, and the intent of a condition specifying testing requirements subsequent to the initial compliance test will be clarified. The new venturi combustors will offer better performance, less maintenance, and a longer life span. In addition CO emissions will be controlled by the installation of a state-of-the-art oxidation catalyst. The catalyst will provide assurance that the actual maximum increase in CO emissions that will be associated with this modification will remain below the current permit emission limit.

The Department will issue the FINAL Permit Amendment, in accordance with the conditions of the DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Any written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Amendment with the conditions of the DRAFT Permit Amendment unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision 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: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. 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 (or a request for mediation, as discussed below) 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 Department's action or proposed action addressed in this notice of intent.

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

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NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407-894-7555
Fax: 407-897-2966

The complete project file includes the Draft Permit Amendment, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

DRAFT

February XX, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William O'Toole
Senior Vice President
Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32830-1000

Re: Revised DRAFT Permit Amendment No. 0950110-002-AC
Reedy Creek Improvement District

Dear Mr. O'Toole:

The Department has reviewed Reedy Creek Improvement District's (RCID) letter received on October 23, 1996, requesting an amendment to its construction permit for an existing 38 MW gas turbine at its Central Energy Plant in Lake Buena Vista, Florida. This revised draft permit also includes the change requested in RCID's letter received on December 16, 1996. These requests are acceptable and the permit is hereby amended as follows:

Specific Condition No. 5

Under the column in the table titled "TPY" and across from the pollutant "Nitrogen oxides (NO_x) peak based on 40 F annual average"

From:

	Gas Fired		Oil Fired	
	lb/hr	TPY	lb/hr	TPY
Nitrogen Oxides (NO _x) peak based on 40°F annual average	112		132	
	77	337	100	17

To:

	Gas Fired		Oil Fired	
	lb/hr	TPY	lb/hr	TPY
Nitrogen Oxides (NO _x) peak based on 40°F annual average	112		132	
	77	280	100	17

Also under footnote 3 in the table add: "The TPY limit includes any emissions from oil firing".

DRAFT

Specific Condition No. 5

Under the column in the table titled “Gas fired lb/hr” and across from the pollutant “Carbon Monoxide (CO) peak load⁴”

From:

	Gas Fired lb/hr	TPY	Oil Fired lb/hr	TPY
Carbon Monoxide (CO) peak load ⁴	11		24	4
reduced load ⁴	25	110	N/A ⁵	N/A ⁵

To:

	Gas Fired lb/hr	TPY	Oil Fired lb/hr	TPY
Carbon Monoxide (CO) peak load ⁴			24	4
reduced load ⁴	25	110	N/A ⁵	N/A ⁵

Specific Condition No. 8, first sentence:

From:

Water injection shall be utilized for NO_x control at a minimum of 0.6/1.0 water to fuel ratio.

To:

Water injection shall be utilized for NO_x control at a minimum of 0.6/1.0 water to fuel ratio. **RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize pollution control and meet the permitted emission limits.**

Specific Condition 15:

From:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO and the annual compliance test emissions data is within the expected CO/NO_x relationship developed from the initial compliance tests.

To:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO.

DRAFT

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

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/ch/hh

Enclosures

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Al Linero *AA Linero 1/22*

FROM: Cleve Holladay *CH*

DATE: January 22, 1997

SUBJECT: Reedy Creek Improvement District/Application to Modify Nominal
38 MW Gas Turbine - Revised Draft Amendment 0950110-002-AC

Attached is a revised letter modifying a construction permit for the above facility.

The amendment makes the following changes:

1. Permitted allowable NO_x emissions will be reduced by 57 tons per year to 280 tons per year
2. RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize NO_x and CO control,
3. The intent of a condition specifying testing requirements subsequent to the initial compliance test will be clarified.
4. Will remove the CO emission limit for peak load of 11 pounds per hour since PSD applicability and the permitted maximum CO emission limit is based on 25 pounds per hour and 110 tons per year.

The new venturi combustors will offer better performance, less maintenance, and a longer life span. In addition CO emissions will be controlled by the installation of a state-of-the-art oxidation catalyst. The catalyst will provide assurance that the actual maximum increase in CO emissions that will be associated with this modification will remain below the current upper permit emission limit.

I recommend your approval and signature.

AAAL/ch/l

FILE COPY



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 2, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William O'Toole
Senior Vice President
Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32380-1000

Re: DRAFT Permit Amendment No. 0950110-002-AC
Reedy Creek Improvement District

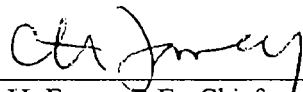
Dear Mr. O'Toole:

Enclosed is one copy of the Draft Air Construction Permit Amendment for the Reedy Creek Improvement District's 38 MW gas turbine located at its Central Energy Plant in Lake Buena Vista, Orange County, Florida. The Department's Intent to Issue Air Construction Permit Amendment and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Cleve Holladay or Mr. Linero at 904/488-1344.

Sincerely,


C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/ch

Enclosures

P 265 659 126

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to MR. WILLIAM O' TOOLE RCID	
Street & Number P.O. Box 10000	
Post Office, State, & ZIP Code LAKE BUENA VISTA, FL 32380-1000	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 095 0110-002-AC	

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 O' TOOLE
 REEDY CREEK IMPROVEMENT DIST.
 P.O. BOX 10000
 LAKE BUENA VISTA, FL 32380-1000

4a. Article Number

P 265 659 126

4b. Service Type

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

7. Date of Delivery

1 7

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X



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

Thank you for using Return Receipt Service.

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Permit No. G-10

• Print your name, address, and ZIP Code in this box •

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JAN 03 1997
BUREAU OF
AIR REGULATION

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Briarstone Road, MS 5605
Tallahassee, Florida 32399-2400

RECEIVED
JAN 03 1997
BUREAU OF
AIR REGULATION



In the Matter of an
Application for Permit Amendment by:

Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32380-1000 /

DRAFT Permit Amendment No.: 0950110-002-AC
38 MW Gas Turbine at Reedy Creek
Orange County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit amendment (copy of DRAFT Permit amendment attached) for the proposed project, as detailed in the application specified above, for the reasons stated below.

The applicant, Reedy Creek Improvement District, applied on October 23, 1996, to the Department for an air construction permit amendment [to replace existing combustors with new extended venturi combustors] on its existing 38 MW gas turbine located at the Central Energy Plant in Lake Buena Vista, Orange County. The amendment makes the following changes: permitted allowable nitrogen oxides emissions will be reduced by 57 tons per year to 280 tons per year; actual CO emissions will be allowed to increase but permitted allowable emissions will remain the same; and the intent of a condition specifying testing requirements subsequent to the initial compliance test will be clarified.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit amendment is required to commence or continue operations at the described facility.

The Department intends to issue this air construction permit amendment based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT". The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 904/488-1344; Fax 904/ 922-6979) within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment pursuant to Rule 62-103.150 (6), F.A.C.

The Department will issue the FINAL Permit Amendment, in accordance with the conditions of the enclosed DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT." Any written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

The Department will issue the permit amendment with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., or a party requests mediation as an alternative remedy under Section 120.573 F.S. before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision 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: 904/488-9730, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. 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 (or a request for mediation, as discussed below) 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 addressed in this notice of intent.

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 notice of intent. 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.

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.

Executed in Tallahassee, Florida.


C. H. Fancy, P.E., Chief
Bureau of Air Regulation


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT (including the PUBLIC NOTICE, and DRAFT permit amendment) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/3/97 to the person(s) listed:

Mr. William O'Toole, RCID *
Mr. Edward Godwin, P.E., RCID *
Mr. Ken Kosky, P.E, KBN
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Dennis Nester, OCEPD

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.


(Clerk) 1/3/97
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Amendment No.: 0950110-002-AC
Change of Combustors on 38 MW Gas Turbine at Reedy Creek Improvement District
Orange County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit amendment to Reedy Creek Improvement District (RCID), for new extended venturi combustors for its existing 38 MW Gas Turbine located at its Central Energy Plant in Lake Buena Vista, Orange County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The change of combustors will result in actual increases of the following pollutants: nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM/PM₁₀) and volatile organic compounds (VOC). These increases are less than the applicable PSD significant emission rates; therefore, PSD requirements do not apply. The amendment will not result in an increase in any allowable emissions from the facility, and will not cause a violation of any state or federal ambient air quality standards or increments. The applicant's name and address are: Reedy Creek Improvement District, P.O. Box 10000, Lake Buena Vista, Florida 32830-1000.

The amendment makes the following changes: permitted allowable NO_x emissions will be reduced by 57 tons per year to 280 tons per year, RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize NO_x and CO control, and the intent of a condition specifying testing requirements subsequent to the initial compliance test will be clarified. The new venturi combustors will offer better performance, less maintenance, and a longer life span. In addition CO emissions will be controlled by the installation of a state-of-the-art oxidation catalyst. The catalyst will provide assurance that the actual maximum increase in CO emissions that will be associated with this modification will remain below the current permit emission limit.

The Department will issue the FINAL Permit Amendment, in accordance with the conditions of the DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Any written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Amendment with the conditions of the DRAFT Permit Amendment unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision 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: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. 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 (or a request for mediation, as discussed below) 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 Department's action or proposed action addressed in this notice of intent.

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

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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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407-894-7555
Fax: 407-897-2966

The complete project file includes the Draft Permit Amendment, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

DRAFT

January XX, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William O'Toole
Senior Vice President
Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32830-1000

Re: DRAFT Permit Amendment No. 0950110-002-AC
Reedy Creek Improvement District

Dear Mr. O'Toole:

The Department has reviewed Reedy Creek Improvement District's letter received on October 23, 1996, requesting an amendment to its construction permit for an existing 38 MW gas turbine at its Central Energy Plant in Lake Buena Vista, Florida. This request is acceptable and the permit is hereby amended as follows:

Specific Condition No. 5

Under the column in the table titled "TPY" and across from the pollutant "Nitrogen oxides (NO_x) peak based on 40 F annual average"

From:

	Gas Fired		Oil Fired	
	lb/hr	TPY	lb/hr	TPY
Nitrogen Oxides (NO _x) peak based on 40°F annual average	112		132	
	77	337	100	17

To:

	Gas Fired		Oil Fired	
	lb/hr	TPY	lb/hr	TPY
Nitrogen Oxides (NO _x) peak based on 40°F annual average	112		132	
	77	280	100	17

Also under footnote 3 in the table add: "The TPY limit includes any emissions from oil firing".

DRAFT

Specific Condition No. 8, first sentence:

From:

Water injection shall be utilized for NO_x control at a minimum of 0.6/1.0 water to fuel ratio.

To:

Water injection shall be utilized for NO_x control at a minimum of 0.6/1.0 water to fuel ratio. RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize pollution control and meet the permitted emission limits.

Specific Condition 15:

From:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO and the annual compliance test emissions data is within the expected CO/NO_x relationship developed from the initial compliance tests.

To:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO.

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

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources Management

HLR/ch/hh

Enclosures

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy

THRU: Al Linero

FROM: *CHH*
Cleve Holladay

DATE: December 27, 1996

SUBJECT: Reedy Creek Improvement District/Application to Modify Nominal 38 MW Gas
Turbine/ AC#0950110-002

public notice package and draft
Attached is a letter modifying a construction permit for the above facility.

The amendment makes the following changes: permitted allowable NO_x emissions will be reduced by 57 tons per year to 280 tons per year, RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize NO_x and CO control, and the intent of a condition specifying testing requirements subsequent to the initial compliance test will be clarified. The new venturi combustors will offer better performance, less maintenance, and a longer life span. In addition CO emissions will be controlled by the installation of a state-of-the-art oxidation catalyst. The catalyst will provide assurance that the actual maximum increase in CO emissions that will be associated with this modification will remain below the current permit emission limit.

I recommend your approval and signature.

BEST AVAILABLE COPY

11/13/96
Reedy Creek Energy Services, Inc.
P.O. Box 10000
Lake Buena Vista, FL 32830-1000

RCES Facsimile Transmittal

13 November, 1996

To: Mr. Martin Costello, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

FAX # (904) 922-6979

From: Edward Godwin, P.E.
RCES Planning & Engineering
Mechanical Engineering Dept.
(407) 824-4943
(407) 824-4529 (FAX)

Re: Reedy Creek Improvement District (RCID)
Central Energy Plant - 30.8 M GE LM5000
Amended Permit 0950110-001-AC

Dear Mr. Costello;

In accordance with your recent discussions with our Mr. Bob Kindle and with Mr. Len Kozlov of the FDEP Central District, please find attached a letter request for a minor administrative modification of the subject permit. This change is intended to clarify the language of Specific Condition 15 to ensure that the permittee and the Central District can accomplish a mutually-satisfactory air emissions test of the source on the scheduled December 3rd test date.

I am faxing a copy of this document and the letter request to Mr. Len Kozlov. Please call me at the above number if you have any comments or concerns.


Edward Godwin

cc: Len Kozlov

Number of pages transmitted including this page = 3

BEST AVAILABLE COPY

November 13, 1996

Martin Costello, PE
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Central Energy Plant - 30.8 MW GE LM-5000
Amended Permit 0950110-001-AC

Dear Mr. Costello:

Specific Condition 15 of Permit 0950110-001-AC relates to annual stack testing for CO emissions and calls for an annual test protocol developed jointly by RCID and FDEP. This protocol will specify the test methods and procedures to be used during the annual compliance testing.

During a pre-test protocol meeting, on November 12, 1996, between RCID and the Central District of FDEP, the last half of the last sentence of Specific Condition 15 created confusion as to the test methods and procedures required to demonstrate that "...the annual compliance test emissions data is within the expected CO/NO_x relationship developed from the initial compliance tests." The intent of Specific Condition 15 is to limit the annual compliance test to a single test at full-load. The clause in question creates confusion because it is arithmetically impossible to demonstrate the CO/NO_x relationship unless tests are performed at more than one load point. Both your department and the Central District appear to be in agreement with RCID that a single load test adequately demonstrates compliance. Removing the clause in question would clarify Specific Condition 15 and simplify the test protocol development process.

BEST AVAILABLE COPY

Therefore this letter requests that the last sentence of Specific Condition 15, which currently reads:

"Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NOx and CO and the annual compliance test emissions data is within the expected CO/NOx relationship developed from the initial compliance tests."

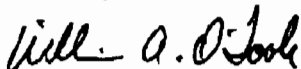
Be changed to read:

"Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NOx and CO."

We apologize for any inconvenience caused by this request. Your prompt handling of this request would be appreciated as the annual compliance test has been scheduled for December 3, 1996, and the test protocol must be completed prior to the day of testing.

If you should have any questions or need additional information, please contact Mr. Edward Godwin, P.E. at (407) 824-4943.

Sincerely,



William A. O'Toole
Senior Vice President
Responsible Official

cc: Mr. Len Kozlov

December 16, 1996

Mr. A.A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
DEC 19 1996
BUREAU OF
AIR REGULATION

RE: Reedy Creek Improvement District
Central Energy Plant-Combustion Turbine Modification
Permit Number 0950110-001

Attention: Mr. Cleve Holiday and Mr. Martin Costello

Dear Cleve and Martin:

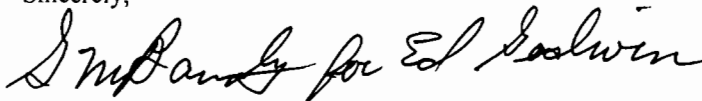
As we discussed, Reedy Creek Energy Services (RCES) requests the Department to consider amending Specific Condition 5 to remove the CO emission limit for peak load of 11 lb/hr. This limit no longer appears warranted given that PSD applicability and maximum emissions are based on 25 lb/hr and 110 tons/year (i.e., 25 lb/hr x 8,760 hrs/yr x ton/2,000 lb). This was established during the last construction permit modification (Permit Number 0950110-001-AC). Two limits for the same pollutant and under different operating conditions includes more complexity in the permit for determining compliance for both RCES and the Department

Most sources have their maximum emission limits corresponding to maximum loads. For this source, the maximum CO emissions will occur at low loads, where RCES has agreed to determine compliance and perform compliance testing. As long as testing for CO was performed at the lowest load operated (i.e., highest CO emissions), emissions at other loads do not seem relevant in terms of compliance. Indeed, at high loads the CO will be much lower.

The increased CO emissions at low loads are also a result of over-controlling NOx emissions by operating with a fixed water-to-fuel ratio over all operating loads. This benefit of reduced NOx when operating at low loads would appear to offset the need to determine compliance with two CO limits when PSD is not involved. Removing the 11 lb/hr limit would also reduce permit complexity.

Please call if you have additional question or need clarification on this request. If this request is not possible, please let us know. RCES appreciates the Department's efforts in expediting this permit modification.

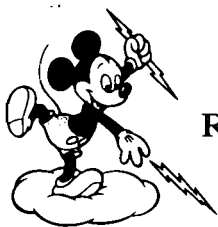
Sincerely,



Ed Godwin/George M. Bandy

cc: Mr. Ken Kosky, P.E.
KBN Engineering and Applied Sciences, Inc.

Mr. William A. O'Toole
Authorized Representative



REEDY CREEK ENERGY SERVICES, INC.

27 November, 1996

Mr. A. A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Reedy Creek Improvement District
Central Energy Plant-Combustion Turbine Modification
Permit Number 0950110-001

Dear Al:

Thank you for allowing us to discuss with you and your staff on November 25, 1996, clarifications to the information requested in your letter of November 21, 1996. This correspondence summarizes the information provided during that discussion which addresses your information request. Information is provided in the same order as requested.

1. The emissions for NO_x, CO and VOC are based on the annual operating reports (AORs) provided to the Department each year. The NO_x emissions in that report are based on the Continuous Monitoring System (CMS) that calculates NO_x emissions based on an equation that incorporates engine performance parameters, water to fuel information and General Electric "cycle-deck" information. The equations were developed using actual test data. The correlation coefficient on the equations are all in excess on 90 percent (i.e., the equations account for almost all the variability in the parameters versus NO_x emissions). The CMS data is calculated on a near-continuous basis and recorded on an hourly basis. The hourly averages are used to calculate annual emissions and to demonstrate compliance with the current average NO_x emissions limit in the original construction permit.

The CO emissions presented in Table 1 are based on the AORs and were calculated using stack test data and annual heat input. Until recently (summer 1996), the turbine has run at full load so CO emissions are generally low. There has not been sufficient time to develop annual CO emissions with low-load operation. The requested CO emissions with the extended venturi combustor and an oxidation catalyst are the same as the recently amended permit that allows low-load operation. With the oxidation catalyst controlling CO emissions, limiting the total emission to those specified in the current permit conditions would assure the Department that PSD review would not be triggered (i.e., less than 100 tons/year increase).

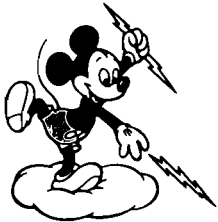
VOC emissions in Table 1 are based on the AORs which were also calculated using stack tests data and heat input. Since the test data has found almost no VOCs in the exhaust, the annual emissions reported are very low (i.e., 0.12 tons/year average). The permit request indicates that VOCs would meet the current permit limits and are below the PSD significant emissions rates. Emissions of VOCs are expected to be very low with the proposed project.

2. The duct burner system installed with the original facility and included in the Department's permits will not be modified as a result of the proposed project. The duct burners are located after the gas turbine but before the heat recovery steam generator (HRSG). The oxidation catalyst will be located downstream of the duct burners.

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3. The only additional equipment associated with the proposed project will be the installation of a chilled water storage tank. The chilled water will be stored at night when cooling loads are low and used to cool the inlet air of the turbine although the tank's primary purpose is to provide comfort cooling to RCID's district cooling customers.

The steam chillers operate independently of gas turbine load, since steam supplied for this equipment is constant and of lower quality, i.e., low-load operation can supply steam for the steam chillers. Therefore, the gas turbine load can still vary at night depending on load demands and economics. Operation of the gas turbine would be based on economic dispatch and any increased gas turbine load would only result in additional steam electric power.

4. The budgetary estimate for the oxidation catalyst is \$1.5 million which consists of \$1.1 million for the catalyst, installed, and associated equipment and \$0.4 million for engineering and other "soft" costs. It is expected that the catalyst life would be about 8 years with a regeneration wash every 3 to 4 years. The catalyst replacement would cost about \$250,000 while regeneration wash would run about \$40,000. RCES's project specifications require that the incremental back pressure on the turbine due to the catalyst be limited to 1.5 inches (water) which we feel would minimize reductions in turbine performance.

5. As provided in Table 2 of the application (Attachment A), the uncontrolled CO emissions would likely range between 95.88 lb/hr and 52.74 lb/hr based on the conditions cited. From these data, uncontrolled CO emissions would therefore range from 420 to 231 tons/year which would put the proposed project above PSD significant emission rates for CO. The maximum proposed controlled CO emission rate is the same as the current permit of 25 lb/hr for low-load operation. Assuming operation all year at low-load, the maximum CO emissions would be only 110 tons/year (current permit limit). With baseline CO emissions of about 21 tons/year, the emission limits in the current permit could not exceed PSD significant emission rates. To assure compliance with the low-load emission limit of 25 lb/hr, we anticipate testing at a range of low loads. Since the turbine will potentially operate at loads even lower than those provided by GE in Table 2 (with concomitant increases in CO), the testing would provide assurance to the Department that the previously approved emission limit would be met.

Please call if you have additional questions. RCES appreciates the Department's efforts in expediting this permit modification.

Sincerely,

Edward Godwin, P.E.
Chief Mechanical Engineer, RCES

cc: Ken Kosky, P.E.
Bob Kindle
Elaine Potusky

cc: C. Holladay
M. Costello



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

November 21, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Edward Godwin, P.E., Project Engineer
Reedy Creek Improvement District
5300 North Cast Drive
Lake Buena Vista, Florida 32830

Dear Mr. Godwin:

Re: Completeness Review for Application to Modify Combustion Turbine
Reedy Creek Improvement District, Permit Number 0950110-001

The Department has reviewed the above referenced application package received on October 24, 1996. Based on our initial review of your proposed project, we have determined that additional information is needed in order to continue processing this application. Please complete the application by providing the information requested below:

1. Explain how Table 1 emissions were calculated. Were NO_x emissions based on CEMS? Were CO emission rates based on stack test data. How were part and full load emission rates factored into the calculated annual emissions for CO? Were VOC's measured by stack test data?
2. Figure 4 of the application shows the oxidation catalyst installed upstream of the heat recovery steam generator. There is no duct burner shown. Page 31 of the application mentions a duct burner. Will there be a duct burner after this project is completed?
3. What additional equipment will be added on the steam host/electric host which may impact the demand on the power plant, e.g. chilled water storage tank size, additional electric chillers--how many and electric demand, additional chillers which use steam--how many and steam demand. If there will be additional steam/electrical demands associated with additional chilled water equipment, then describe when these steam/electrical demands will occur during a typical day's operation. Are night time operation rates on the power plant expected to be higher and therefore CO emission rates lower?

Mr. Ed Godwin

Page 2

11/21/96

4. Quantify the total capital and O&M costs associated with the CO control system. Include operational costs associated with added pressure drop from the catalyst and catalyst replacement costs.
5. Provide a best estimate of future emissions of CO if no catalyst is used. Estimate uncontrolled annual emissions of CO (tpy) after installing the new combustors considering the percentage of time at low load, midload and full load, predicted annual operating hours, and other factors which may affect CO emissions.

If you have any questions, please contact Cleve Holladay or Martin Costello at 904/488-1344.

Sincerely,



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

AAL/ch

cc: Gary Kuberski, CD
Ken Kosky, KBN

P 339 251 182

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sender	
Ed Godwin	
Street & Number	
Reedy Creek	
Post Office, State, & ZIP Code	
CBU, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	11-21-96

PS Form 3800, April 1995

Fold at line over top of envelope to the right of the return address

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, 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Ed Godwin, PE
Reedy Creek Improve. Dist
5300 N. Cast Drive
Lake Buena Vista, FL

32838

4a. Article Number

P 339 251 182

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

11-25

5. Signature (Addressee)

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

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OF POSTAGE, \$300



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Print your name, address, and ZIP Code here

BUREAU OF
AIR REGULATION
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 31, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Edward Godwin, P.E.
Chief Mechanical Engineer
Reedy Creek Energy Services, Inc.
Post Office Box 10,000
Lake Buena Vista, Florida 32830-1000

Dear Mr. Godwin:

Re: Reedy Creek Improvement District Permit 0950110-001-AC
Application to Modify Nominal 38 MW Gas Turbine
Heat Recovery Generation System

We received the above referenced permit application on October 23, 1996. However, we have not yet received the permit application fee and will be unable to begin processing your application until we receive it. We have been unable to locate the check you stated that you sent to us on October 23, 1996. We recommend you stop payment on this check and reissue another one.

If you have any questions regarding this matter, please call Kim Tober at (904)488-1344.

Sincerely,

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

AAL/kt

cc: K. Tober

P 339 251 173

US Postal Service
Receipt for Certified Mail

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

Sent To	
Edward Modern	
Street & Number	
Reedy Creek ES	
Post Office, State, & ZIP Code	
L300 FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	10-31-96
No check	

PS Form 3800, April 1995

Fold at line over top of envelope to the right of the return address

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, 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. Edward Modern, PE
 Reedy Creek ES, Inc
 P O Box 10,000
 Lake Buena Vista, FL
 32830-1000

4a. Article Number
P 339 251 173

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
5

5. Signature (Addressee)

6. Signature (Agent)

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

NOV 1 1996
FLA
Wd

Thank you for using Return Receipt Service.

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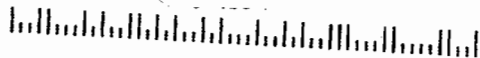
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PENALTY FOR PRIVATE
USE IF NO POSTAGE PAID
OF POSTAGE, \$300

NOV 13 1996

BUREAU OF
AIR REGULATION

Print your name, address and ZIP Code here

Department of Environmental Protection
Mail Station 5505 -- NSRS
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



**AIR CONSTRUCTION PERMIT
APPLICATION FOR REEDY CREEK
CENTRAL ENERGY PLANT
NEW EXTENDED
VENTURI COMBUSTORS**

RECEIVED

OCT 23 1996

BUREAU OF
AIR REGULATION

Prepared For:

**Reedy Creek Improvement District
5300 North Cast Drive
Lake Buena Vista, Florida 32830**

RECEIVED

OCT 23 1996

BUREAU OF
AIR REGULATION

Prepared By:

**KBN Engineering and Applied Sciences, Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500**

**October 1996
9651103Y/F1**

Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: Reedy Creek Improvement District	
2. Site Name: Central Energy Plant North Service Area	
3. Facility Identification Number: 30ORL480110 [] Unknown	
4. Facility Location Information: Street Address or Other Locator: 5300 North Cast Drive City: Lake Buena Vista County: Orange Zip Code: 32830	
5. Relocatable Facility? [] Yes [x] No	6. Existing Permitted Facility? [x] Yes [] No

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	October 24, 1996
2. Permit Number:	0950110-002-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID		Description of Emissions Unit	Permit Type
Unit #	Unit ID		
1R	007	38 MW GE LM5000 Gas-Fired Turbine Generator System	ACM2

See individual Emissions Unit (EU) sections for more detailed descriptions.
Multiple EU IDs indicated with an asterisk (*). Regulated EU indicated with an "R".

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be renewed: _____

Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision, e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

Category II: All Air Construction Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): _____

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units.

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: _____
0950110-001-AC

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

- Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

Attached - Amount: \$ \$ 250.00

Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations: See Attachment A
2. Projected or Actual Date of Commencement of Construction : 1 Jan 1997
3. Projected Date of Completion of Construction : 1 Jan 1998

Professional Engineer Certification

1. Professional Engineer Name: Kennard F. Kosky Registration Number: 14996
2. Professional Engineer Mailing Address: Organization/Firm: KBN Eng. and Applied Sciences, Inc. Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers: Telephone: (352)336-5600 Fax: (352)366-6603

4. Professional Engineer's 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 air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the 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 hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

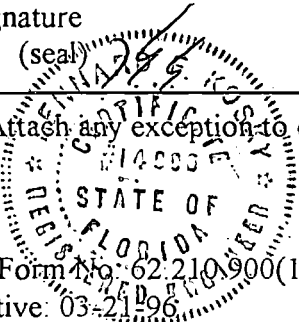
Paul F. Kelly

Signature

10/13/96

Date

* Attach any exception to certification statement.



Application Contact

1. Name and Title of Application Contact: Edward Godwin, P.E., Project Engineer
2. Application Contact Mailing Address: Organization/Firm: Reedy Creek Improvement District Street Address: 5300 North Cast Drive City: Lake Buena Vista State: FL Zip Code: 32830
3. Application Contact Telephone Numbers: Telephone: (407) 828-4943 Fax: (407) 824-4529

Application Comment

This application is for a minor modification to existing facility that involves installation of new equipment & a change in method of operation. RCID is requesting a reduction to the current NOx permit limit for the natural-gas-fired turbine generator. RCID is requesting additions to the permit specific conditions that will ensure emission increases from installation of the new extended venturi combustors, inlet air cooling & oxidation catalyst will not require PSD review.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 442.0 North (km): 3139.0			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 28 / 25 / 30 Longitude: (DD/MM/SS): 81 / 35 / 10			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 79	6. Facility SIC(s): 4911
7. Facility Comment (limit to 500 characters): The information described in this section is for the Central Energy Plant at RCID. RCID has submitted a Title V application of which the Central Energy Plant is an emissions unit.			

Facility Contact

1. Name and Title of Facility Contact: Edward Godwin, P.E., Project Engineer
2. Facility Contact Mailing Address: Organization/Firm: Reedy Creek Improvement District Street Address: 5300 North Cast Drive City: Lake Buena Vista State: FL Zip Code: 32830
3. Facility Contact Telephone Numbers: Telephone: (407) 824-4943 Fax: (407) 824-4529

B. FACILITY REGULATIONS

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

Not Applicable

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

Not Applicable

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Detail Information:

1. Pollutant Emitted:
2. Requested Emissions Cap: (lb/hr) (tons/yr)
3. Basis for Emissions Cap Code:
4. Facility Pollutant Comment (limit to 400 characters):

Facility Pollutant Detail Information:

1. Pollutant Emitted:
2. Requested Emissions Cap: (lb/hr) (tons/yr)
3. Basis for Emissions Cap Code:
4. Facility Pollutant Comment (limit to 400 characters):

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. A Fig 1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. A Fig 2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID(s): <u>Att. A Fig 3,4</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u> <input type="checkbox"/> Not Applicable

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

11. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Compliance Assurance Monitoring Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan Submitted to Implementing Agency - Verification Attached Document ID: _____ <input type="checkbox"/> Plan to be Submitted to Implementing Agency by Required Date <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Statement (Hard-copy Required) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

**A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)****Type of Emissions Unit Addressed in This Section**

1. Regulated or Unregulated Emissions Unit? Check one:

[x] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

[x] This Emissions Unit information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): 38 MW GE LM5000 Gas-Fired Turbine Generator System		
2. Emissions Unit Identification Number: <input type="checkbox"/> No Corresponding ID <input type="checkbox"/> Unknown 007		
3. Emissions Unit Status Code: A	4. Acid Rain Unit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment (limit to 500 characters): The installation of the extended venturi combustor, inlet air cooling and oxidation catalyst does not change the nominal nameplate rating of the machine.		

Emissions Unit Control Equipment Information

A.

1. Description (limit to 200 characters): Water Injection to reduce NOx at 65-75% efficiency.
2. Control Device or Method Code: 28

B.

1. Description (limit to 200 characters): Catalytic oxidation to reduce CO at a minimum of 80% efficiency.
2. Control Device or Method Code: 99

C.

1. Description (limit to 200 characters):
2. Control Device or Method Code:

**C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Details

1. Initial Startup Date:		
2. Long-term Reserve Shutdown Date:		
3. Package Unit: Manufacturer: General Electric	Model Number: LM5000	
4. Generator Nameplate Rating:	32 MW	
5. Incinerator Information:		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate:	450	mmBtu/hr
2. Maximum Incineration Rate:	lbs/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Operating Capacity Comment (limit to 200 characters):		
Maximum heat input rate is based on natural gas lower heating values (LHV).		

Emissions Unit Operating Schedule

1. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/yr	8,760 hours/yr

**D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

Rule Applicability Analysis (Required for Category II Applications and Category III applications involving non Title-V sources. See Instructions.)

Not Applicable

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

See Attachment A

**E. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: TB-1 (HRSG Stack)	
2. Emission Point Type Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Gas turbine and duct burners vent through the HRSG stack.	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:	
5. Discharge Type Code: <input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W	
6. Stack Height:	65 feet
7. Exit Diameter:	11 feet
8. Exit Temperature:	310 °F

9. Actual Volumetric Flow Rate:	310,073	acfm
10. Percent Water Vapor:	9.2	%
11. Maximum Dry Standard Flow Rate:	195,021	dscfm
12. Nonstack Emission Point Height:		feet
13. Emission Point UTM Coordinates:		
Zone:	East (km):	North (km):
14. Emission Point Comment (limit to 200 characters):		
Exit gas flow rate, temperature, and water vapor based on combustion turbine and duct burner operating at 30.5 MW (May 1996). Exit Diameter = 11.16 ft.		

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Natural gas used in turbine generator and duct burner (emissions related to million cubic feet burned).	
2. Source Classification Code (SCC): 2-01-002-01	
3. SCC Units: Million Cubic Feet Burned	
4. Maximum Hourly Rate: 0.486	5. Maximum Annual Rate: 4,262
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash: 0
9. Million Btu per SCC Unit: 925	
10. Segment Comment (limit to 200 characters): Maximum percent sulfur = 0.003. Heat content based on LHV.	

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): No. 2 fuel oil used in turbine generator (emissions related to thousand gallons burned).	
2. Source Classification Code (SCC): 2-01-001-01	
3. SCC Units: thousand gallons burned	
4. Maximum Hourly Rate: 3.43	5. Maximum Annual Rate: 1,152
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 0.4	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: 131	
10. Segment Comment (limit to 200 characters): Maximum annual rate = 1152.48. Maximum percent ash = 0.005. MMBtu per SCC unit = 131.350. Heat content based on LHV.	

**G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
NOx			EL

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: NO_x		
2. Total Percent Efficiency of Control:		%
3. Potential Emissions:	lb/hour	280 tons/year
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
5. Range of Estimated Fugitive/Other Emissions:		
[] 1	[] 2	[] 3 _____ to _____ tons/yr
6. Emission Factor:		
Reference: see Attachment A		
7. Emissions Method Code:		
[] 0	[] 1	[] 2 [] 3 [] 4 <input checked="" type="checkbox"/> 5
8. Calculation of Emissions (limit to 600 characters):		
see Attachment A		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):		
NO_x synthetically limited in permit specific condition through 12-month rolling average determined using CMS.		

Emissions Unit Information Section 1 of 1
Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: ESCPSD		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	280 tons/year
5. Method of Compliance (limit to 60 characters): EPA Method 20 and CMS		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Lb/hr limit remains unchanged from existing permitted limit.		

B.

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

**I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)**

Visible Emissions Limitations: Visible Emissions Limitation of

1.	Visible Emissions Subtype:
2.	Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3.	Requested Allowable Opacity Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4.	Method of Compliance:
5.	Visible Emissions Comment (limit to 200 characters):

Visible Emissions Limitations: Visible Emissions Limitation of

1.	Visible Emissions Subtype:
2.	Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3.	Requested Allowable Opacity Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4.	Method of Compliance:
5.	Visible Emissions Comment (limit to 200 characters):

**J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)**

Continuous Monitoring System Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: [] Rule [] Other	
4. Monitor Information: Monitor Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

Continuous Monitoring System Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: [] Rule [] Other	
4. Monitor Information: Monitor Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

**K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT
TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)**

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

- The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and the emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and the emissions unit consumes increment.
- For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
- None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and the source consumes increment.
- The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and the source consumes increment.
- For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and the emissions unit consumes increment.
- None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3.	Increment Consuming/Expanding Code:		
	PM	<input type="checkbox"/> C	<input type="checkbox"/> E <input type="checkbox"/> Unknown
	SO ₂	<input type="checkbox"/> C	<input type="checkbox"/> E <input type="checkbox"/> Unknown
	NO ₂	<input type="checkbox"/> C	<input type="checkbox"/> E <input type="checkbox"/> Unknown
4.	Baseline Emissions:		
	PM	lb/hour	tons/year
	SO ₂	lb/hour	tons/year
	NO ₂		tons/year
5.	PSD Comment (limit to 200 characters):		
	The emission unit 'netted-out' of PSD review with the shutting down of existing sources.		

**L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements for All Applications

1.	Process Flow Diagram	
	<input checked="" type="checkbox"/> Attached, Document ID: <u>Att. A Fig 3,4</u>	<input type="checkbox"/> Waiver Requested
	<input type="checkbox"/> Not Applicable	
2.	Fuel Analysis or Specification	
	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Waiver Requested
	<input checked="" type="checkbox"/> Not Applicable	
3.	Detailed Description of Control Equipment	
	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Waiver Requested
	<input checked="" type="checkbox"/> Not Applicable	
4.	Description of Stack Sampling Facilities	
	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Waiver Requested
	<input checked="" type="checkbox"/> Not Applicable	
5.	Compliance Test Report	
	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable
	<input type="checkbox"/> Previously Submitted, Date: _____	
6.	Procedures for Startup and Shutdown	
	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable
7.	Operation and Maintenance Plan	
	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable
8.	Supplemental Information for Construction Permit Application	
	<input checked="" type="checkbox"/> Attached, Document ID: <u>Attachment A</u>	<input type="checkbox"/> Not Applicable
9.	Other Information Required by Rule or Statute	
	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Acid Rain Permit Application (Hard Copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

ATTACHMENT A

1.0 INTRODUCTION

Reedy Creek Improvement District (RCID) owns and operates a combined cycle cogeneration facility located in Lake Buena Vista, Florida (see Figure 1). The facility is operated by Reedy Creek Energy Services (RCES). The facility consists of a nominal 32-megawatt (MW) natural gas-fired combustion turbine (CT) unit with an associated heat recovery steam generator (HRSG). Duct burners are located between the CT and HRSG to provide supplemental heat input when needed. Electric power is produced from a generator attached to the CT and an 8.5-MW steam turbine generator. A facility plot plan and process flow diagrams are included in Figures 2, 3, and 4, respectively. The facility is permitted to burn No. 2 fuel oil for a maximum of 14 days per year in the event of natural gas curtailment. This facility is considered to be an existing major source because potential emissions of nitrogen oxides (NO_x) are in excess of 100 tons per year (TPY).

On February 12, 1996, an air construction permit (FDEP Permit Number 0950110-001-AC) was issued to allow reduced load operation of the turbine. The permit provided for an emissions increase for carbon monoxide (CO) which increases at lower loads. The expiration date of the permit was July 1, 1996. Pursuant to FDEP Rule 62-213.420(1)(a)4., the unit is operating under the construction permit until the Title V operation permit is issued. Copies of the most current air construction and operating permits are included in Appendix A.

Currently the gas turbine is equipped with combustors that require frequent replacement and excessive maintenance on both the turbine and the combustors themselves. RCID would like to replace the existing combustors with extended venturi combustors that offer better performance, less maintenance, and a longer life span. The new combustors will still be able to burn both natural gas and fuel oil. However, the new combustors will yield higher emissions of carbon monoxide (CO). Emissions of nitrogen oxides (NO_x) are not expected to change substantially with the new combustor since NO_x emissions are controlled through water injection. In addition to the new combustors, inlet air cooling will be added to allow the turbine to operate consistently at a lower inlet air temperature and higher power output. The turbine currently has evaporative cooling which reduces inlet temperature, but the temperature decrease is limited to the reduction available through evaporation at the actual ambient wet-bulb temperature. The new inlet cooling will allow the turbine to operate continuously at about 50°F. The turbine currently has the capability to operate at this inlet temperature with the commensurate power level. The proposed

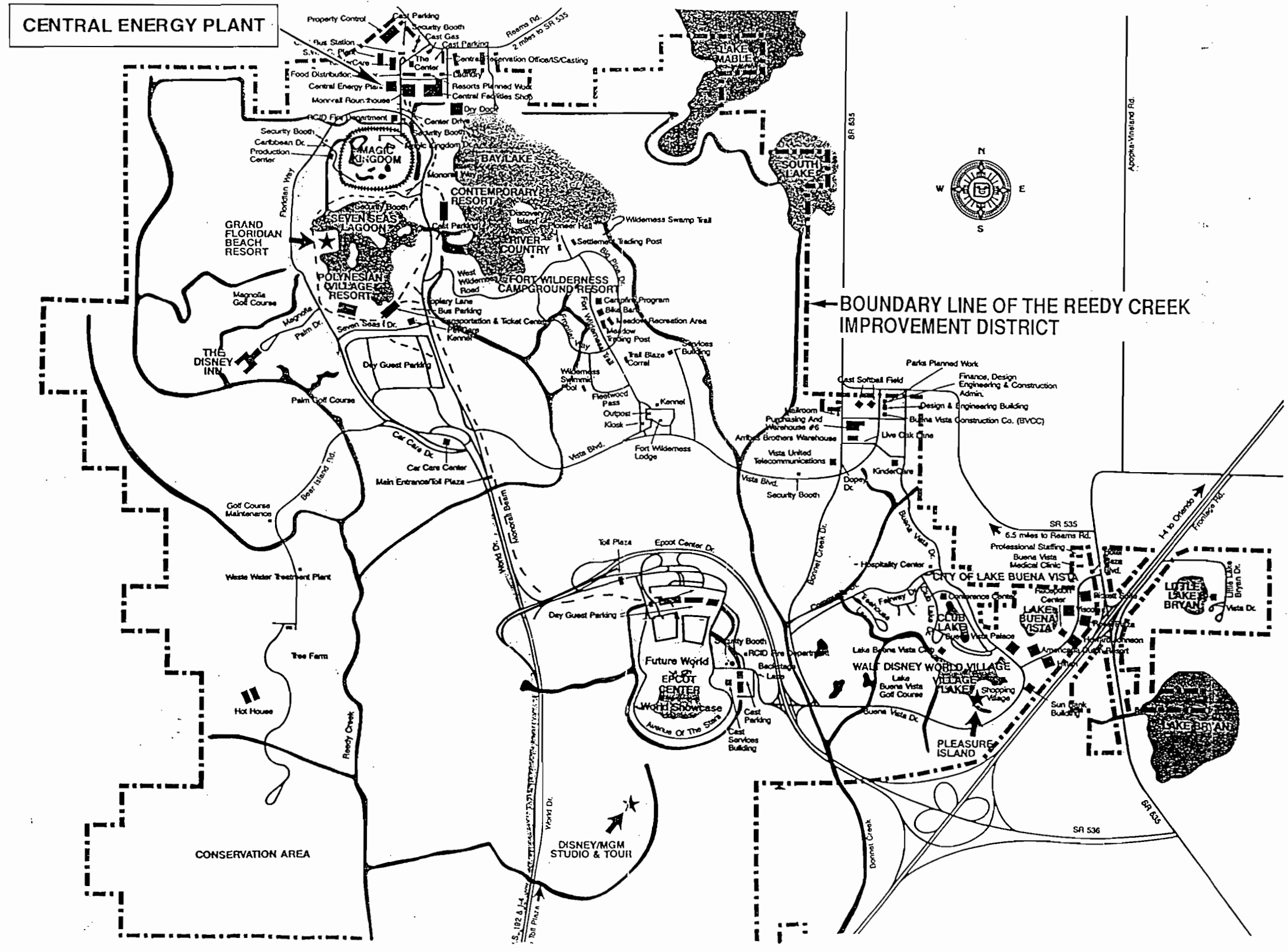


Figure 1
 Site Location of Central Energy Plant
 With Respect to the Reedy Creek Improvement District,
 Orange County, Florida



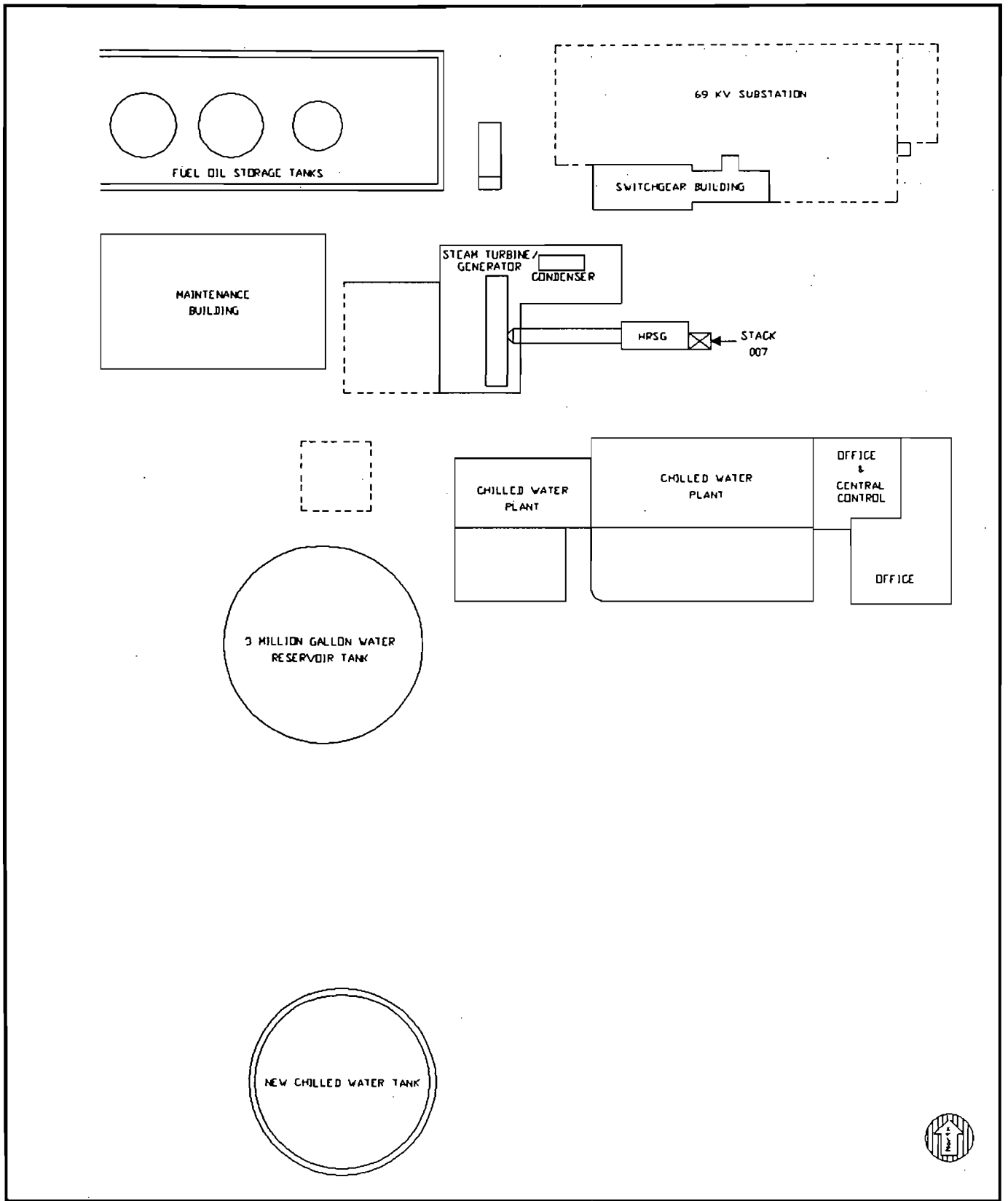


Figure 2
 Site Plan for the RCID Central Energy Plant-North Service Area



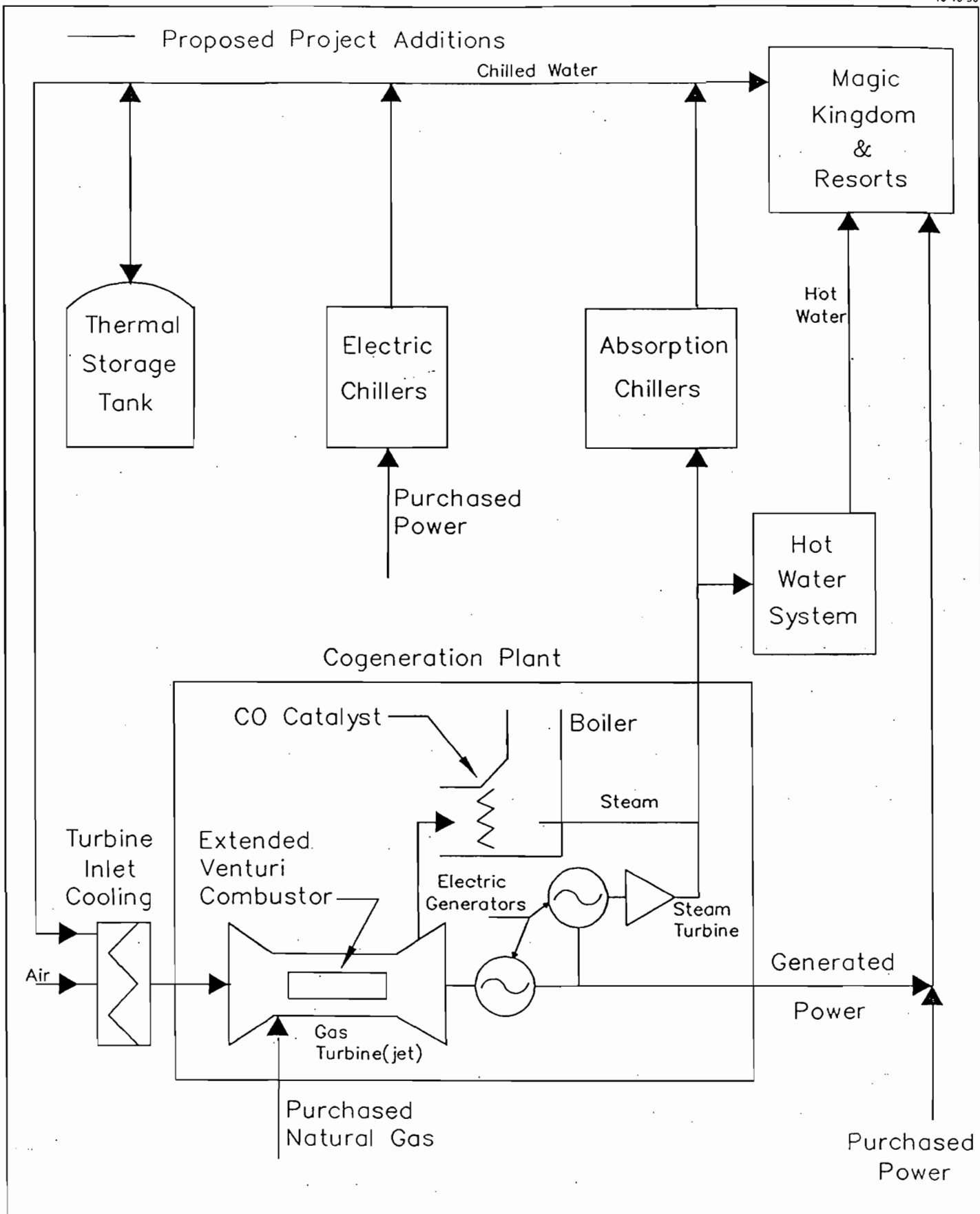


Figure 4
Process Flow Diagram for the RCID Energy Plant
Combustion Turbine Extended Venturi Combustor Modification



operation of the facility with the new venturi combustors and inlet cooling will require a modification to the Air Construction permit for the facility. In order to assure that the emissions of NO_x and CO do not increase with this modification, increased water injection and an oxidation catalyst, respectively, will be included in the project's design and operation. As a consequence, this permit application is primarily limited to those conditions relating to NO_x and CO emissions.

RCID is submitting the Application For Air Permit - Long Form [Florida Department of Environmental Protection (FDEP) Form No. 62-210.900(1)] to obtain approval from FDEP for the requested facility modification. The resulting net emissions increase for all regulated pollutants will not exceed the prevention of significant deterioration (PSD) significant emission rates. The modification, therefore, will not be subject to the FDEP PSD review requirements in Rules 62-212.500.

2.0 ACTUAL EMISSIONS

Table 1 presents the actual emissions over the last 5 years contained in the annual operating reports (AORs) provided annually to the FDEP. Actual emissions, as defined in Rule 62-210.200(12) are the actual annual emissions in tons/year (TPY) emitted during period time before the change. Generally, this is a two year period preceding the change, but can be a different time frame more representative of unit operation. Since electric utility units are influenced by weather conditions, unit outages, and economic factors, a longer time frame is more appropriate given the potential for natural variability. For the RCID cogeneration facility, a 5-year period is believed representative of actual emissions.

3.0 EVALUATION OF EMISSIONS FOR THE MODIFIED FACILITY

Emissions based on the turbine manufacturer's performance curves for NO_x and CO are shown in Tables 2 and 3. The maximum potential emissions for natural gas and oil firing are presented in Tables 2 and 3, respectively, with the new combustors at both peak and reduced loading. PM, SO₂ and volatile organic compound (VOC) emissions will be the same as the permitted emission rates, since the proposed change will not substantially affect emission rates of these pollutants.

The emissions estimates were developed using the gas turbine manufacturer's (General Electric) performance data for the LM5000 CT with an extended venturi combustor and the inlet air cooling operating at average conditions (50 degrees Fahrenheit) and maximum conditions

(40 degrees Fahrenheit). Emissions were developed for peak loading (above 29.0 MW) and low load conditions. A 50°F turbine inlet temperature represents a conservative worst case average emission estimate, while the 40°F turbine inlet temperature represents the same maximum condition cited in the original construction permit application.

To assist in controlling NO_x emissions, RCID will increase the water to fuel ratio from the current ratio of 0.55 to 0.7 when firing natural gas. This will reduce NO_x emissions by 25 percent over the current operating practice. For oil firing, the water to fuel ratio will be increased to 1.0 with a concomitant 38 percent reduction from current NO_x emissions. With the increase in water to fuel ratio, as well as the operation of the new combustor, CO emissions will increase substantially. An oxidation catalyst will be installed to reduce CO emissions that are associated with the addition of the new combustor, the increase in water injection and operations at low load. The CO catalyst, capable of at least 80% CO reduction, will be installed in line after the combustion turbine. The addition of the catalyst will lower maximum CO emissions from currently permitted rates. RCID is currently evaluating various vendors of catalytic CO oxidation control systems. Therefore, specific design data for the CO control system is not available at this time. RCID will submit this information as soon as it becomes available.

4.0 REGULATORY ANALYSIS

To determine if the proposed installation of the extended venturi combustor and inlet cooling meets the definition of "modification" as defined under the PSD regulations, a comparison of the actual emissions and future potential emissions must be made. A modification refers to:

"any physical change in, change in the method of operation of, or addition to a stationary source or facility which increases the actual emissions of any air pollutant regulated under Rules 62-210, 62-212, 62-252, 62-272, 62-273, 62-275, 62-296, or 62-297, F.A.C., including any not previously emitted, from any source or facility."

A "major modification", which would be subject to PSD review, refers to a modification where the net emissions increase of a regulated pollutant exceeds the significant emission rate limits established for that pollutant. For example, the significant emission rate level for NO_x has been established as 40 TPY. The net emissions increase is determined by comparing the emissions due to the proposed modification with actual emissions. Actual emissions are based on the average of the most recent five years of actual emissions data (e.g., those reported on the Annual Operating

Reports) because these emissions are believed more representative for electric utility units of normal facility operation than the last two years.

Actual NO_x emissions for the combined cycle unit between 1991 and 1995 is an average of 240.7 TPY. These actual emissions are considered to be representative of normal facility operation.

For the proposed project, RCID requests that the annual emissions of NO_x in tons per year be limited to 280 tons/year. This would classify the facility as a minor modification and not subject the facility to PSD review. Table 4 is illustrative of future representative actual emissions based on an assumed "worst case" annual operating condition. This illustrative condition assumes a 90 percent capacity factor for the CT operating at full load, operation of the duct burners at full load and a 90 percent capacity factor and operation on oil for 3.5 days. As shown by this illustrative example, the worst cast annual emissions increase is less than the PSD significant emission rate. Emissions of other pollutants at their maximum potential emission rates in the current permit minus past actual emissions will be less than the PSD significant emission rates (see Table 4). Presented below is a summary of the requested change in permit limits.

Pollutant	Past Actual (TPY)	Permitted Emissions (TPY)	Proposed Permit Limits	Net Increase from Past Actual (TPY)
NO _x	240.7	354	280	39.3
SO ₂	2.25	25.1	No change	22.9
PM/PM10	2.23	5.5	No change	3.3
CO	20.9	114	No change	93.1
VOC	0.12	27	No change	26.9

Note: See Specific Condition 5 of 0950110-001-AC; natural gas and oil firing annual emission limits combined.

5.0 COMPLIANCE DEMONSTRATION

RCID will demonstrate compliance with the revised 280 tons/year limit on NO_x using the continuous monitoring system (CMS). The CMS was originally installed with the turbine and is

used to demonstrate compliance with a federally enforceable condition of the construction permit. See Specific Condition 5, Footnote 3, which states: "The 12 month rolling average emissions will be calculated using hourly averages during the month and then using consecutive monthly averages to obtain an annual average. The DEP District office may alter this averaging method after due consideration of alternative compliance plans." The federally enforceable limit combined with the federally enforceable calculation of a 12 month rolling average provide the Department with reasonable assurance that PSD would not apply.

A change in the short-term emissions rates (i.e., lb/hr) is not required, since the current permit limits provide margin for the machine and the CMS calculates hourly NO_x emissions that would be used to demonstrate compliance with the annual emission limit. Short-term emissions rates for SO₂, CO, PM and VOC do not effect PSD applicability.

Determining compliance with the existing permitted maximum NO_x and CO emission limits, and the validation of algorithms for the CMS will continue to be demonstrated by conducting initial and annual stack testing at full and reduced load operation for NO_x and CO.

6.0 PROPOSED PERMIT MODIFICATIONS

RCID proposes the following permit modifications to specific conditions in construction permit 0950110-001-AC:

Specific Condition 5. Change the amount under the column titled "TPY" from 337 to 280.

Under footnote 3, add the wording - "The TPY limit include any emissions from oil firing".

Specific Condition 8. Change the wording to "... at a minimum of 0.7/1.0 water-to-fuel ratio or as determined through compliance tests to meet the permitted emission limits." This allows "fine tuning" of the water-to-fuel ratio based on compliance tests.

Specific Condition 14. While this condition has already been met for low-load operation, it should be retained for the proposed project.

Specific Condition 15. As the complement to Specific Condition 14, this should also be retained.

Table 1. Actual Operating Data and Pollutant Emissions for 38 MW Gas Turbine and HRSG Electric Generating System at Reedy Creek Improvement District

Operating Data	Annual Operating Report Year					Average
	1991	1992	1993	1994	1995	
PM/PM10 Emissions (TPY)						
- Natural Gas	2.61	2.67	2.77	0.35	2.14	
- Fuel oil	0.49	0.00	NB	0.10	NB	
Total	3.10	2.68	2.77	0.45	2.14	2.23
NOx Emissions (TPY)						
- Natural Gas	235.35	233.00	264.31	232.80	230.50	
- Fuel oil	6.68	0.03	NB	0.80	NB	
Total	242.03	233.03	264.31	233.60	230.50	240.69
SO2 Emissions (TPY)						
- Natural Gas	2.60	1.35	0.96	0.49	0.25	
- Fuel oil	5.52	0.03	NB	0.08	NB	
Total	8.11	1.37	0.96	0.57	0.25	2.25
VOC Emissions (TPY) ^a						
- Natural Gas	0.01	0.03	0.00	ND	ND	
- Fuel oil	0.55	0.00	NB	0.01	NB	
Total	0.56	0.03	0.00	0.01	0	0.12
CO Emissions (TPY)						
- Natural Gas	20.47	20.99	26.10	17.96	17.26	
- Fuel oil	1.52	0.01	NB	0.05	NB	
Total	21.99	20.99	26.10	18.01	17.26	20.87

Footnotes:

^a No VOC's detected from gas combustion in CT. Only source of VOC's is from duct burners.

ND = Non-detectible

NB = Not Burned during this year

Table 2. Maximum and Average Predicted Pollutant Emissions and Operating Data from General Electric Combustion Turbine Performance Curves for the 38 MW Gas Turbine and HRSG Electric Generating System Fired on Natural Gas at Reedy Creek Improvement District

Operating Data ^a	Reduced Load Conditions		Peak Load Conditions	
	Maximum	Average	Maximum	Average
Ambient Temperature (°F)	40	50	40	50
Power (MW)	29.96	28.03	40.49	38.23
Fuel Usage (lb/hr)	15,277	14,567	19,408	18,575
(ft ³ natural gas /hr) ^b	340,245	324,432	432,249	413,705
(MMBtu/hr) ^c	315	300	400	383
NOx Emissions (lb/hr)	41.68	38.62	66.74	61.94
NOx Emissions (PPMv @15% O2 dry)	35.49	34.43	44.61	43.20
CO Emissions (lb/hr) (Uncontrolled)	107.79	95.88	60.72	52.74

Note:

^a All conditions are shown at a water to fuel ratio of 0.7.

Data at 50°F was linearly interpreted from data presented at 40°F and 59°F.

^b Based on a density of 0.0449 lb/ft³ for natural gas with a LHV of approximately 20,000 Btu/lb, "Combustion: Fossil Power Systems", Combustion Engineering, 1981.

^c Based on a natural gas LHV of 925 Btu/ft³.

$$100 \text{ lb/hr} \times \frac{1 \text{ ton}}{2000 \text{ lb}} + 3760 \text{ hr/yr} = \sim 440 \text{ TAY}$$

Table 3. Maximum and Average Predicted Pollutant Emissions and Operating Data from General Electric Combustion Turbine Performance Curves for the 38 MW Gas Turbine with HRSG Electric Generating System Fired on No.2 Fuel Oil at Reedy Creek Improvement District

Operating Data ^a	Peak Load Conditions ^b	
	Maximum	Average
Ambient Temperature (°F)	40	50
Power (MW)	40.40	38.16
Fuel Usage (lb/hr)	20,431	19,408
(gal/hr) ^c	2,991	2,842
(MMBtu/hr) ^d	393	373
NOx Emissions (lb/hr)	80.08	74.43
NOx Emissions (PPMv @15% O2 dry)	51.69	50.11
CO Emissions (lb/hr) (Uncontrolled)	27.97	25.26

Note:

^a All conditions are shown at a water to fuel ratio of 1.0.

Data at 50°F was linearly interpreted from data presented at 40°F and 59°F.

^b Data is only shown for conditions at peak load because turbine may not be operated at reduced load when firing oil.

^c Based on a No. 2 fuel oil density of 6.83 lb/gal.

^d Based on a No. 2 fuel oil LHV of 131,350 Btu/gal.

Table 4. Illustrative Example of Representative Future Actual Annual Emissions Resulting from Addition of the Extended Venturi Combustors and Inlet Cooling for the 38 MW Gas Turbine and HRSG Electric Generating System at Reedy Creek Improvement District.

Pollutant	Combustion Turbine and Duct Burner ^a Fired on Natural Gas		Combustion Turbine ^b Fired on Fuel Oil		Max Annual Emissions (TPY)	Average Actual Emissions (TPY)	Net Emissions Increase (TPY)	PSD Significant Emission Rates (TPY)	PSD Applies ??
	Hourly (lb/hr)	Annual (TPY)	Hourly (lb/hr)	Annual (TPY)					
PM/PM10	0.7	3.2	2	0.4	3.5	2.23	1.3	25	No
NOx Peak Load Max	71.3	N/A	20.0	N/A	N/A	N/A	N/A		
Peak Load Avg	66.5	262.3	18.6	3.1	265.4	240.69	25	40	No
Reduced Load Max	46.3	N/A	N/A	N/A	N/A	N/A	N/A		
Reduced Load Avg	43.2	170.4	N/A	N/A	170.4	240.69	(-70)	40	No
SO ₂	1.2	4.7	0.3	0.1	4.8	2.25	2.5	40	No
CO Peak Load Max	13.0	51.4	1.4	0.2	51.6	N/A	N/A		
Reduced Load Max	22.5	88.5	N/A	N/A	88.5	20.87	67.6	100	No
VOC	6	23.7	2	0.3	23.9	0.12	23.8	40	No

Note:

^a Represents emissions based on combustion turbine and duct burner operating at full load for 7,884 hours/year (i.e., 90% capacity factor).

NOx emissions for the duct burner based on the maximum heat input of 23 mmBtu/hr and 0.2 lb/mmBtu or 4.6 lb/hr.

CO emissions from the combustion turbine reduced by 80% in oxidation catalyst, e.g., from Table 2, reduced load maximum CO emission rate is: 107.79 lb/hr x (1-0.8) = 21.6 lb/hr. CO emissions from duct burner (i.e., 0.896 lb/hr) added to CT emissions (i.e., 22.5 lb/hr).

CO emissions from the duct burner based on maximum heat input of 23 mmBtu/hr and 0.03896 lb/mmBtu or 0.896 lb/hr. CO emission rate based on AP-42 emission factor in Section 1.4 Natural Gas Combustion for small industrial boilers of 40 lb/mmcf.

PM, SO₂, and VOC emissions from combustion turbine and duct burner based on permitted emission rates at 90% capacity factor.

^b Represents emissions based on combustion turbine operating for 3.5 days at full load.

APPENDIX A

**CONSTRUCTION PERMIT 0950110-001-AC
OPERATING PERMIT AO48-170280**

CONSTRUCTION PERMIT 0950110-001-AC

Final Determination

Reedy Creek Improvement District
Central Energy Plant
Lake Buena Vista, Florida
Orange County

Gas Turbine and Heat Recovery Steam Generator
With Duct Burner - GE LM 5000
38 Megawatts

Permit No. 0950110-001-AC
Previously AC48-137740

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

February 12, 1996

Final Determination

On June 22, 1995, an application was received from the Reedy Creek Improvement District (RCID) to modify the construction permit for its 38 megawatt (MW) gas turbine electrical generator with a heat recovery steam generator (HRSG) and duct burner located at the Central Energy Plant in Lake Buena Vista, Orange County. The purpose of the modification is to allow an increase in carbon monoxide (CO) emissions so that the unit may subsequently operate at lower power output levels.

The effect of operating at lower loads is that carbon monoxide emissions may be as high as 110 tons per year (TPY) compared to the previously permitted limit of 48 TPY. However, during those periods, nitrogen oxide (NO_x) emissions will be lower. If the unit were operated solely at low load (approximately 15 MW), CO emissions would increase by 48 TPY while NO_x emissions would decrease by over 100 TPY from the presently permitted limit of 337 TPY.

Because RCID wishes to maintain the flexibility to operate at high and low loads, the only change required in the permit is the increase in the limit for CO. The increase in emissions is less than significant with respect to applicability of Prevention of Significant Deterioration (PSD). The unit utilizes water injection for NO_x control and is fired with natural gas except when it is unavailable.

The Notice of Intent to Issue was published on December 8, 1995 in the Orlando Sentinel. The following comments were received during the 14 day comment period. The Department's response to these comments are also detailed below.

Comments from Applicant with Department's Response:

A.

Comment:

Preliminary Determination

Third paragraph: Last Sentence-Replace "steam" with "water". The NO_x control system uses water injection.

Response:

Corrected in final Determination to reflect use of water instead of steam.

B.

Comment:

Specific Condition 1.

The modifications to the construction permit which were dated February 15, 1991, May 29, 1991, August 13, 1991, and December 15, 1993 have also been issued by the Department. These should be added to the list in the condition.

Response:

The list of amendments was deleted since all previous amendments/modifications have been incorporated into the new construction permit.

C.

Comment:

Specific Condition 2.

1. Nitrogen Oxides: Under the column "Pollutant" the word "avg." under nitrogen oxides should be clarified by adding the word "annual" before "avg.". The original intent of the word average was to calculate and ensure annual average NO_x emissions meet the 77 lb/hr/337 TPY for gas and 100 lb/hr/17 TPY for oil. This is described by the footnote under the table which states: "The average emissions will be calculated using hourly.....plans." To clarify this condition, the words "annual average" should be used. Also, the wording of the footnote may be somewhat confusing as to whether it applies to both the turbine and duct burner and the mechanism as to how the annual average is calculated. It is recommended that the wording of the footnote be changed to read:
"The average NO_x emission from the turbine and duct burner combined will be calculated to obtain monthly average; an annual average is calculated using consecutive monthly averages."
2. Sulfur Dioxide: The sulfur dioxide emissions for gas firing should be 1.2 lb/hr and 5.1 TPY. These emission rates were included in the permit revision dated August 13, 1991 that was issued by the Department.
3. Footnote 1: This footnote was changed by the January 7, 1993 permit amendment issued by the Department to read:

"Fuel oil firing shall be limited to 14 days per year."
4. Footnote 6: It is suggested that the term "NO_x" be included before "concentration" in this footnote since the footnote only applies to NO_x. Therefore, the footnote would read: "Variation in NO_x concentration with variation in results."
5. Bottom footnote: The references to oil should be deleted since oil firing was eliminated by a permit modification and the duct burner unit is not capable of firing oil.

Response:

1. Change has been made.
2. Change has been made.
3. Change has been made.
4. Change has been made.
5. Change has been made.

D.

Comment:

Specific Condition 4.

The Department's memorandum of November 22, 1995 would suggest that testing at intermediate and low loads is unnecessary. The relationships developed in the permit application indicate that CO rises with turbine inlet temperature and varies with load and water to fuel ratio. Since the water to fuel ratio would not be reduced from that in the permit, CO concentrations would not deviate from this relationship. This will be confirmed by the initial compliance tests. Thus, it is suggested that this condition be changed as follows:

"Annual stack testing for CO emissions at full capacity load conditions shall be performed according to an annual test protocol developed jointly by RCID and FDEP. This protocol will specify the test methods and procedures to be used during the annual compliance testing. Using the established procedures of this protocol as a guide, simultaneous testing full capacity load conditions shall be conducted for CO, NO_x and VE. EPA Method 10 shall be used for CO, EPA Methods 7e or 20 shall be used for NO_x and EPA Method 9 shall be used for VE. Testing at other loads will not be necessary if the annual compliance test is within the expected CO/NO_x relationship developed from the initial compliance tests."

Response:

Suggested language is incorporated.

Additional Changes made to the permit by the Department to clarify certain issues.

The Department changed footnote 6 in specific condition 5 to reflect the requirements in Subpart GG, 40 CFR 60.334 and 60.335.

Footnote 7 was added to the table to clarify that compliance with the SO₂ limitations may be demonstrated by fuel analysis or Method 20 pursuant to Subpart GG.

Footnote 8 was added to clarify that 62-297.340(1)(e) (F.A.C.) provides relief from annual compliance testing for PM when firing liquid fuels for less than 400 hours per year. Specific Condition 2 limits fuel oil operation to less than 400 hrs/yr.

VOC testing has been limited to the initial compliance test since initial test results indicated non-detectable levels of VOC using Method 25A.

The final determination of the Department is to amend and re-issue the construction permit as indicated in the Intent to Issue with the changes indicated above.

The electrical production capacity was corrected to 38 MW for consistency with the original construction permit.





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT

In the matter of an
Application for Permit by:

Mr. Thomas M. Moses, District Administrator
Reedy Creek Improvement District
Post Office Box 10170
Lake Buena Vista, Florida 32830-0170

DEP File No. 0950110-001-AC
Orange County

Attached is the construction permit No. 0950110-001-AC which is a re-issued and amended version of permit No. AC48-137740. It is for the existing 38 MW turbine generator and heat recovery steam generator with duct burner located at the Central Energy Plant in Lake Buena Vista. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by 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 14 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed by certified mail before the close of business on 2-20-96 to the listed persons.

Clerk Stamp

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

Clerk Date

Copies furnished to:
A. Zahm, CD
K. Kosky, KBN



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:

Reedy Creek Improvement District
Post Office Box 10170
Lake Buena Vista, Florida 32830-0170

Permit No: 0950110-001-AC
Expiration Date: July 1, 1996
County: Orange
Latitude/Longitude: 28°25'30"N 81°35'10"W
Project: GE Gas-Fired Turbine with Heat
Recovery System

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-212, 62-275, 62-296, and 62-297, Florida Administrative Code (F.A.C.). It replaces and amends previously issued permit No. AC48-137740 dated March 3, 1988 and revisions thereto. 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 specifically described as follows:

For the construction of a 38 MW GE LM 5000 gas or oil-fired turbine generator system with a heat input capacity of 450 MMBtu/hr. The project includes a gas-fired duct burner, heat recovery boiler and steam turbine, at the Central Energy Plant at Bay Lake near Lake Buena Vista, Orange County, Florida. The unit will be operated at low and intermediate load conditions as well as the previously permitted base load condition.

Construction will be in accordance with the permit application and plans, documents, and reference material submitted unless otherwise stated in the general and specific conditions herein.

Attachments are listed below:

1. Original permit AC48-137740 dated March 3, 1988.
2. Amendments/extensions/revisions of original permit dated 9/14/88, 5/17/89, 11/13/89, 1/15/91, 2/15/91, 5/29/91, 8/13/91, 1/7/93, 10/29/93, 12/15/93, 3/30/95, 6/16/95
3. RCID's application received June 22, 1995.
4. DEP letter requesting additional information dated July 6, 1995.
5. RCID's response received August 25, 1995.
6. RCID's Waiver of 90 Day Time Limit received November 9, 1995.
7. DEP's Draft Amended Permit Issued November 30, 1995.
8. RCID's Letter and Proof of publication received December 20, 1995.
9. KBN's comments to the Draft Amended Permit.

Permittee:
Reedy Creek Improvement District

Permit Number: 0950110-001-AC
Expiration Date: July 1, 1996

GENERAL 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 403.161, 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 acknowledgment 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 F.S. 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.

Permittee:
Reedy Creek Improvement District

Permit Number: 0950110-001-AC
Expiration Date: July 1, 1996

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 non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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.

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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, 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 F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 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.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- (X) Compliance with New Source Performance Standards (NSPS)

14. 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 his 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.

Permittee:
Reedy Creek Improvement District

Permit Number: 0950110-001-AC
Expiration Date: July 1, 1996

- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used;
 - the results of such analyses.

SPECIFIC CONDITIONS:

1. The turbine may operate continuously (8760 hr/yr).
2. Natural gas shall be the primary fuel fired in the turbines and duct burner system. No. 2 fuel oil can be used as a backup fuel in the turbine only for up to 14 days per year.
3. The maximum heat input to the turbine and the duct burner combined shall not exceed 450 MMBtu/hr (normal duct burner heat input rate of 23 MMBtu/hr).
4. When the gas turbine is not in operation, the duct burner heat input may be increased up to, but not to exceed, 198 MMBtu/hr.
5. The emissions, from the turbine and duct burner combined, shall not exceed:

Pollutant	Gas-fired lb/hr	TPY ²	Oil Fired ¹ lb/hr	TPY
Nitrogen Oxides (NO _x) peak based on 40°F annual average ³	112 77	337	132 100	17
Sulfur Dioxide (SO ₂)	1.2	5.1	118	20
Particulates (PM) ⁸	0.8	3.5	9	2
Carbon Monoxide (CO) peak load ⁴ reduced load ⁴	11 25	110	24 N/A ⁵	4 N/A ⁵
Volatile Organic Compounds (VOCs) ⁸	6	26	6	1
Visible Emissions (VE)	5% Opacity		10% Opacity	
NO _x @ 15% O ₂ dry basis peak average ³	74 ppmv 58 ppmv		82 ppmv ⁶ 68 ppmv	
SO ₂ @ 15% oxygen dry basis	--		58 ppmv	

¹ Fuel oil firing shall be limited to 14 days per year.
² TPY (tons per year)
³ The 12 month rolling average emissions will be calculated using hourly averages during the month and then using consecutive monthly averages to obtain an annual average. The DEP District office may alter this averaging method after due consideration of alternative compliance plans.
⁴ Reduced load is 15.0 MW - 29.0 MW. Peak Load is above 29.0 MW.
⁵ When the turbine is oil-fired it shall not be operated at reduced load conditions.
⁶ Variation in NO_x concentration with variation in water to fuel ratios shall be documented by a plot of pollutant concentration versus water to fuel ratios, as per the most recent 4 load compliance test results.
⁷ Subsequent to initial compliance tests, compliance may also demonstrated by fuel analysis pursuant to 40 CFR 60.333
⁸ Initial compliance test only.
 The duct burner NO_x emissions shall not exceed (corresponding to 0.2 lb/MMBtu) 4.6 lb/hr for gas at 23 MMBtu heat input or 40 lb/hr for gas at 198 MMBtu/hr.

Permittee:
Reedy Creek Improvement District

Permit Number: 0950110-001-AC
Expiration Date: July 1, 1996

6. The No. 2 oil sulfur content shall not exceed 0.4 percent.

7. In accordance with Rule 62-210.300(3) F.A.C., the Black Start Cummings No. 2 fuel oil fired emergency electric generator is exempt from permitting requirements

Pursuant to Rule 62-210.300(3), F.A.C., this source, although exempt from permitting requirements of Chapter 62-210 and Chapter 62-4, F.A.C., "shall be subject to any applicable emission standard specified in Rule 62-252.300, and 62-296, F.A.C., other than Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) requirements."

Furthermore, pursuant to Rule 62-213.420(3) (m), F.A.C., this source, is required to be included in the Title V operation permit application.

8. Water injection shall be utilized for NO_x control at a minimum of 0.6/1.0 water-to-fuel ratio. If compliance testing warrants this ratio to be re-investigated, the ratio at which compliance is maintained shall be incorporated into the permit.

9. Pursuant to Rule 62-297.340, F.A.C., Frequency of Compliance Tests, initial and annual compliance testing shall be conducted with the fuels used in the preceding 12 month period using:

1. EPA Method 20 for NO_x and SO₂ (fuel sulfur analysis may be used for SO₂)
2. EPA Method 10 for CO
3. EPA Method 9 for VE

Other DEP approved methods may be used for compliance testing only after prior Departmental approval.

10. The proposed project shall comply with all the applicable requirements of:

- a) Chapter 62-4, and 62-210 through 62-297, F.A.C.
- b) 40 CFR 60, Subpart GG, Gas Turbines

11. DEP's district office shall be notified in writing at least 15 days prior to source testing. Written reports of the tests shall be submitted to the district office within 45 days of test completion.

The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit (Rule 62-2, F.A.C.).

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and a Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate (Rules 62-2 and 62-4, F.A.C.)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an
Application for Permit Modification


Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32380-1000/

DEP File No.: 0950110-002-AC
38 MW Gas Turbine at Reedy Creek
Orange County

Enclosed is a letter that modifies Permit Number 0950110-002. This letter authorizes the replacement of existing combustors on Reedy Creek's 38 MW gas turbine with new extended venturi combustors. This permit modification is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., 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.

Executed in Tallahassee, Florida.



C.H. Fancy, P.E., Chief
Bureau of Air Regulation

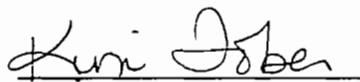
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4-1-97 to the person(s) listed:

Mr. William O'Toole, RCID *
Mr. Edward Godwin, P.E., RCID *
Mr. Ken Kosky, P.E, Golder Associates
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Dennis Nester, OCEPD

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.


(Clerk) 4-1-97
(Date)

FINAL DETERMINATION

Reedy Creek Improvement District

Modification of Permit No. AC 0970110-002
38 MW Gas Turbine at Reedy Creek Central Energy Plant

An Intent to Issue an air construction permit modification for Reedy Creek Improvement District's 38 MW gas turbine located at its Central Energy Plant in Lake Buena Vista, Orange County, Florida was distributed on January 22, 1997. The Notice of Intent was published in the Orlando Sentinel on February 13, 1997. Comments were not submitted in response to the public notice.

The final action of the Department will be to issue the permit modification as proposed.

P 339 251 189

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.

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Sent to <i>William O'Jole</i>	
Street & Number <i>Reedy Creek ID</i>	
Post Office, State, & ZIP Code <i>Lake Buena Vista</i>	
Postage	\$ <i>F1</i>
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>4-1-97</i>
<i>0950110-002-AC</i>	

PS Form 3800, April 1995

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- 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.

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1. Addressee's Address
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Consult postmaster for fee.

3. Article Addressed to:

*Mr. William O'Jole
 Reedy Creek Improve. Dist
 P.O. Box 10,000
 Lake Buena Vista, FL*

32830-1000

4a. Article Number

P 339-251 189

4b. Service Type

- Registered
- Express Mail
- Return Receipt for Merchandise
- Certified
- Insured
- COD

7. Date of Delivery

APR 1 1997

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WJ

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**BUREAU OF
AIR REGULATION**

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 1, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William O'Toole
Senior Vice President
Reedy Creek Improvement District
P.O. Box 10000
Lake Buena Vista, Florida 32830-1000

Re: Permit Modification No. 0950110-002-AC
Reedy Creek Improvement District

Dear Mr. O'Toole:

The Department has reviewed Reedy Creek Improvement District's (RCID) letter received on October 23, 1996 requesting an amendment to its construction permit for an existing 38 MW gas turbine at its Central Energy Plant in Lake Buena Vista, Florida. This permit also includes the change requested in RCID's letter received on December 16, 1996. These requests are acceptable and the permit is hereby amended as follows:

Specific Condition No. 5

Under the column in the table titled "TPY" and across from the pollutant "Nitrogen oxides (NO_x) peak based on 40°F annual average"

From:

	Gas Fired lb/hr	TPY	Oil Fired lb/hr	TPY
Nitrogen Oxides (NO _x) peak based on 40°F annual average	112		132	
	77	337	100	17

To:

	Gas Fired lb/hr	TPY	Oil Fired lb/hr	TPY
Nitrogen Oxides (NO _x) peak based on 40°F annual average	112		132	
	77	280	100	17

Also under footnote 3 in the table add: "The TPY limit includes any emissions from oil firing".

Specific Condition No. 5

Under the column in the table titled "Gas fired lb/hr" and across from the pollutant "Carbon Monoxide (CO) peak load⁴"

From:

	Gas Fired lb/hr	TPY	Oil Fired lb/hr	TPY
Carbon Monoxide (CO) peak load ⁴	11		24	4
reduced load ⁴	25	110	N/A ⁵	N/A ⁵

To:

	Gas Fired lb/hr	TPY	Oil Fired lb/hr	TPY
Carbon Monoxide (CO)	25	110	24	4

Footnotes 4 and 5 no longer apply

Specific Condition No. 8, first sentence:

From:

Water injection shall be utilized for NO_x control at a minimum of 0.6/1.0 water to fuel ratio.

To:

Water injection shall be utilized for NO_x control at a minimum of 0.6/1.0 water to fuel ratio. **RCID will provide data from compliance tests in order to allow the Department to set a final water injection-to-fuel ratio in order to optimize pollution control and meet the permitted emission limits.**

Specific Condition 15:

From:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO and the annual compliance test emissions data is within the expected CO/NO_x relationship developed from the initial compliance tests.

To:

Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO.

Mr. William O'Toole
Page 3 of 3
April 1, 1997

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

HLR/ch/

Enclosures

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy
Al Linero *ashin*

FROM: Cleve Holladay *CH*

DATE: March 27, 1997

SUBJECT: Reedy Creek Improvement District/Application to Modify Nominal
38 MW Gas Turbine 0950110-002-AC

Attached for your approval and signature is a letter that will modify the construction permit for the above mentioned facility. The new venturi combustors will offer better performance, less maintenance, and a longer life span. In addition CO emissions will be controlled by the installation of a state-of-the-art oxidation catalyst. The catalyst will provide assurance that the actual maximum increase in CO emissions that will be associated with this modification will remain below the current upper permit emission limit.

The allowable NO_x and CO limits were adjusted to conform to the new design. The final water-to-fuel injection ratio will be determined during the first compliance test. It will be set such that NO_x and CO emissions are simultaneously minimized.

I recommend your approval and signature.

AAL/ch/l

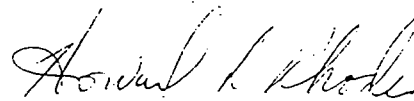
Permittee:
Reedy Creek Improvement District

Permit Number: 0950110-001-AC
Expiration Date: July 1, 1996

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application (Rule 62-4, F.A.C.).

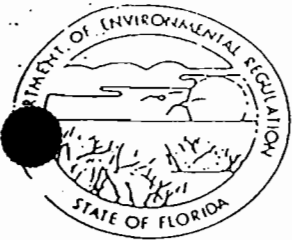
12. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to DEP's District office.
13. During the new turbine debugging period, not to exceed nine months, the older Orenda power trains shall not be fired unless the new GE turbine is not in operation. After the debugging period is over, the Orenda turbines and their associated equipment shall be dismantled.
14. An initial compliance test shall be conducted in order to obtain the air operation permit for the modification. This test will consist of testing CO emissions at peak, two intermediate and low load conditions. Test day peak load based on BTU input will be established based on the operating limits of the unit during the test day. Intermediate loads shall be established based on equally spaced points between peak and low load levels. Initial compliance testing at all load conditions will be conducted with the duct burners operating. If compliance with the proposed emission rate is demonstrated during this initial compliance test, revised annual CO compliance test procedures will be incorporated as part of the annual stack test protocol.
15. Subsequent to the initial test, annual stack testing for CO emissions at full capacity load conditions shall be performed according to an annual test protocol developed jointly by RCID and FDEP. This protocol will specify the test methods and procedures to be used during the annual compliance testing. Using the established procedures of this protocol as a guide, simultaneous testing full capacity load conditions shall be conducted for CO, NO_x and VE. EPA Method 10 shall be used for CO, EPA Methods 7e or 20 shall be used for NO_x and EPA Method 9 shall be used for VE. Testing at other loads will not be necessary if the unit is shown to be in compliance with the applicable emission standards for NO_x and CO and the annual compliance test emissions data is within the expected CO/NO_x relationship developed from the initial compliance tests.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Howard L. Rhodes, Director
Division of Air Resources Management

OPERATING PERMIT AO48-170280



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Alex Alexander, Deputy Assistant Secretary

Permittee:
Reedy Creek Improvement District
P.O. Box 36
Lake Buena Vista, FL 32830

Attention: Thomas M. Moses
Director/ General Manager

I. D. Number:
Permit/Certification
Number: A048-170280
Date of Issue:
Expiration Date: 12/15/94
County: Orange
Latitude/Longitude:
28°25'34"N/81°34'48"W
UTM: 17-442.0 KmE; 3139.0 KmN
Project: Gas Fired Turbine
Generator with Heat Recovery
System

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. 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 30.8 MW GE LM5000 gas fired turbine generator system with a heat input capacity of 345 MMBTU/hr. The project includes an in-line duct burner, heat recovery boiler and steam turbine, at the Central Energy Plant. This source is located at Bay Lake, near Lake Buena Vista, Orange County, Florida.

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

PERMITTEE:

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727 or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agent, employees, servants or representatives.
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), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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 the 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 of 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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 at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit.
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonable 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 notify and provide the department with the following information:
 - a. a description of and cause of non-compliance; and

PERMITTEE:

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

- b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 revocation of this permit.

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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.
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.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
- () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards
(Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
15. When requested by the department, the permittee shall within a reasonable time furnished any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that 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 submitted or corrected promptly.

PERMITTEE:
 Reedy Creek Improvement District
 Attention: Thomas M. Moses
 Director/General Manager

I. D. Number:
 Permit/Certification Number:
 A048-170280
 Date of Issue:
 Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

1. The turbine may operate continuously (8760 hrs/yr).
2. Only natural gas shall be fired in the turbine and duct burner. No. 2 oil shall be used in periods of curtailed natural gas supply. The duration of oil firing shall not exceed 14 days annually.
3. The maximum heat input to the turbine and the duct burner combined shall not exceed 345 MMBTU/hr. (normal duct burner heat input rate of 23 MMBTU/hr).
4. When the gas turbine is not in operation, the duct burner heat input may be increased up to, but not to exceed, 198 MMBTU/hr.
5. The emissions, from the turbine and duct burner combined, shall not exceed:

<u>Pollutant</u>	<u>Gas Fired</u>		<u>Oil Fired¹</u>	
	<u>lb/hr.</u>	<u>TPY*</u>	<u>lb/hr.</u>	<u>TPY</u>
Nitrogen Oxides (NOX) peak @ 40°F	112		132	
	average	77	100	17
Sulfur Dioxide (SO ₂)	0.2	0.8	118	20
Particulates (PM)	0.8	3.5	9	2
Carbon Monoxide (CO)	11	48	24	4
Volatile Organics (VOCs)	6	26	6	1
Visible Emissions (VE)	5% opacity		10% opacity	
NOx, at 15% O ₂ dry basis	peak	74 ppmv	82 ppmv ²	
	Average	58 ppmv	68 ppmv	
SO ₂ , at 15% oxygen dry basis	-		58 ppmv	

*TPY (tons per year)

- 1 Oil will be fired only when there is natural gas curtailment. It will be fired for no more than 14 days annually.
- 2 Variation in concentration with variation in ambient air temperature documented by a plot of pollutant concentration versus ambient temperature, as per initial compliance test results.

PERMITTEE:
Reedy Creek Improvement District

Attention: Thomas M. Moses
Director/General Manager

I. D. Number:
Permit/Certification Number:
A048-170280
Date of Issue:
Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

The average emissions will be calculated using hourly logged averages to obtain a 30 day average and then using 12 consecutive 30 day averages to obtain an annual average. The DER District Office may alter this averaging method after due consideration of alternative compliance plans.

The duct burner NOx emissions shall not exceed (corresponding to 0.2 lb/MMBTU) 4.6 lb/hr for gas or oil at 23 MMBTU heat input or 40 lbs/hr. for gas or oil at 198 MMBTU/hr.

6. The No. 2 oil sulfur content shall not exceed 0.4 percent.
7. The "Black Start" Cummins No. 2 oil fired emergency generator, when fired on a normal basis to maintain a state of readiness, shall not be operated beyond the 10 minutes/week check out period.

For inventory purposes only, the emergency generator's expected emissions are listed below:

<u>Pollutant</u>	<u>lbs/year</u>
NOx	232
CO	36
VOC	9
PM	8
SO ₂	30

8. Water injection shall be utilized for NOx control at a minimum of 0.55 water to fuel ratio. If compliance testing warrants this ratio to be re-investigated, the ratio at which compliance is maintained shall be incorporated into the permit.
9. Annual compliance testing conducted annually from the date of February 1, 1989 shall be conducted with the fuels used in the preceding 12 months period using:
 1. EPA Method 20 for NOx and SO₂
 2. EPA Method 10 for CO
 3. EPA Method 5 for PM
 4. EPA Method 9 for VE

Other DER approved methods may be used for compliance testing only after prior Departmental approval.

PERMITTEE:
Reedy Creek Improvement District

Attention: Thomas M. Moses
Director/General Manager

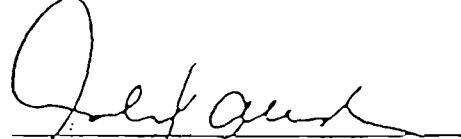
I. D. Number:
Permit/Certification Number:
A048-170280
Date of Issue:
Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

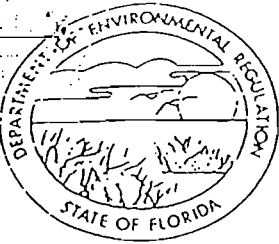
10. The project shall comply with all the applicable requirements of:
 - a. Chapter 17-2, FAC
 - b. 40 CFR 60, Subpart GG, Gas Turbines
 - c. 40 CFR 60, Subpart Db, Industrial Steam Generating Units.
11. DER's District Office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the district office within 45 days of test completion.
12. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to DER's District Office.
13. Each calendar year on or before March 1, submit for each source, an Annual Operations Report DER Form 17-1.202(6) for the preceding calendar year in accordance with Rule 17-4.14, F.A.C.
14. An operation permit renewal must be submitted at least 60 days prior to the expiration date of this permit (Rule 17-4.09, F.A.C.).

ISSUED 1-3-9

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

A08

A. Alexander
Deputy Assistant Secretary
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803

over now



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Alex Alexander, Deputy Assistant Secretary

NOTICE OF PERMIT

RECEIVED

JAN 16 1990

REEDY CREEK ENERGY SERVICES, INC.

Reedy Creek Improvement District
P.O. Box 36
Lake Buena Vista, FL 32830

Attention: Thomas M. Moses, Director/ General Manager

Orange County - AP
GE Gas Fired Turbine Generator with Heat Recovery System

Dear Mr. Moses:

Enclosed is Permit Number A048-170280, dated 1-3-90, to operate a GE Gas Fired Turbine Generator with Heat Recovery System, issued pursuant to Section 403.087, Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing), unless the right to petition has been waived. The petition must conform to the requirements of Chapters 17-103 F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within that time constitutes a waiver of any right such person has to an administrative determination pursuant to 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.

CC: Ed Bodewig, 201(S) effective November 10, 1982 Page 6 of 3

Bob Kandle

Bob Kall

...

Best Available Copy

PERMITTEE:
 Reedy Creek Improvement District
 Attention: Thomas M. Moses
 Director/General Manager

I. D. Number:
 Permit/Certification Number:
 A048-170280
 Date of Issue:
 Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

1. The turbine may operate continuously (8760 hrs/yr).
2. Only natural gas shall be fired in the turbine and duct burner. No. 2 oil shall be used in periods of curtailed natural gas supply. The duration of oil firing shall not exceed 14 days annually.
3. The maximum heat input to the turbine and the duct burner combined shall not exceed 345 MMBTU/hr. (normal duct burner heat input rate of 23 MMBTU/hr).
4. When the gas turbine is not in operation, the duct burner heat input may be increased up to, but not to exceed, 198 MMBTU/hr.
5. The emissions, from the turbine and duct burner combined, shall not exceed:

Pollutant	Gas Fired		Oil Fired ¹	
	lb/hr.	TPY*	lb/hr	TPY
Nitrogen Oxides (NOX) peak @ 40°F	112		132	
	average	77	100	17
Sulfur Dioxide (SO ₂)	0.2	0.8	118	20
Particulates (PM)	0.8	3.5	9	2
Carbon Monoxide (CO)	11	48	24	4
Volatile Organics (VOCs)	6	26	6	1
Visible Emissions (VE)	5% opacity		10% opacity	
NOx, at 15% O ₂ dry basis	peak	74 ppmv	82 ppmv ²	
	Average	58 ppmv	68 ppmv	
SO ₂ , at 15% oxygen dry basis	-		58 ppmv	

*TPY (tons per year)

1. Oil will be fired only when there is natural gas curtailment. It will be fired for no more than 14 days annually.
2. Variation in concentration with variation in ambient air temperature documented by a plot of pollutant concentration versus ambient temperature, as per initial compliance test results.

PERMITTEE:
Reedy Creek Improvement District
Attention: Thomas M. Moses
Director/General Manager

I. D. Number:
Permit/Certification Number:
A048-170280
Date of Issue:
Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

The average emissions will be calculated using hourly logged averages to obtain a 30 day average and then using 12 consecutive 30 day averages to obtain an annual average. The DER District Office may alter this averaging method after due consideration of alternative compliance plans.

The duct burner NOx emissions shall not exceed (corresponding to 0.2 lb/MMBTU) 4.6 lb/hr for gas or oil at 23 MMBTU heat input or 40 lbs/hr. for gas or oil at 198 MMBTU/hr.

6. The No. 2 oil sulfur content shall not exceed 0.4 percent.
7. The "Black Start" Cummins No. 2 oil fired emergency generator, when fired on a normal basis to maintain a state of readiness, shall not be operated beyond the 10 minutes/week check out period.

For inventory purposes only, the emergency generator's expected emissions are listed below:

<u>Pollutant</u>	<u>lbs/year</u>
NOx	232
CO	36
VOC	9
PM	8
SO ₂	30

8. Water injection shall be utilized for NOx control at a minimum of 0.55 water to fuel ratio. If compliance testing warrants this ratio to be re-investigated, the ratio at which compliance is maintained shall be incorporated into the permit.
9. Annual compliance testing conducted annually from the date of February 1, 1989 shall be conducted with the fuels used in the preceding 12 months period using:
 1. EPA Method 20 for NOx and SO₂
 2. EPA Method 10 for CO
 3. EPA Method 5 for PM
 4. EPA Method 9 for VE

Other DER approved methods may be used for compliance testing only after prior Departmental approval.

PERMITTEE:
Reedy Creek Improvement District

Attention: Thomas M. Moses
Director/General Manager

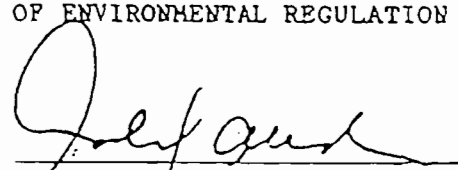
I. D. Number:
Permit/Certification Number:
A048-170280
Date of Issue:
Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

10. The project shall comply with all the applicable requirements of:
 - a. Chapter 17-2, FAC
 - b. 40 CFR 60, Subpart GG, Gas Turbines
 - c. 40 CFR 60, Subpart Db, Industrial Steam Generating Units.
11. DER's District Office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the district office within 45 days of test completion.
12. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to DER's District Office.
13. Each calendar year on or before March 1, submit for each source, an Annual Operations Report DER Form 17-1.202(6) for the preceding calendar year in accordance with Rule 17-4.14, F.A.C.
14. An operation permit renewal must be submitted at least 60 days prior to the expiration date of this permit (Rule 17-4.09, F.A.C.).

ISSUED 1-3-90

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

ASB

A. Alexander
Deputy Assistant Secretary
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803

PERMITTEE:

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727 or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agent, employees, servants or representatives.
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), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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 the 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 of 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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 at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit.
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonable 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 notify and provide the department with the following information:
 - a. a description of and cause of non-compliance; and

PERMITTEE:

I.D. Number:
Permit/Certification Number:
Date of Issue:
Expiration Date:

- b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 revocation of this permit.

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11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

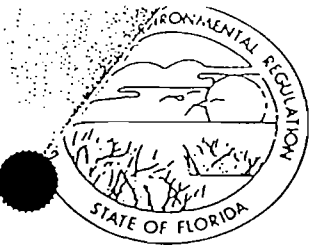
13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
- Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnished any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that 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 submitted or corrected promptly.



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Alex Alexander, Deputy Assistant Secretary

Permittee:
Reedy Creek Improvement District
P.O. Box 36
Lake Buena Vista, FL 32830

Attention: Thomas M. Moses
Director/ General Manager

I. D. Number:
Permit/Certification
Number: A048-170280
Date of Issue:
Expiration Date: 12/15/94
County: Orange
Latitude/Longitude:
28°25'34"N/81°34'48"W
UTM: 17-442.0 KmE; 3139.0 KmN
Project: Gas Fired Turbine
Generator with Heat Recovery
System

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. 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 30.8 MW GE LM5000 gas fired turbine generator system with a heat input capacity of 345 MMBTU/hr. The project includes an in-line duct burner, heat recovery boiler and steam turbine, at the Central Energy Plant. This source is located at Bay Lake, near Lake Buena Vista, Orange County, Florida.

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

This Order (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 paragraph. Upon the timely filing of a petition this Permit will not be effective until further Order of the Department.

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 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 REGULATION

cme *Alexander*

A. Alexander
Deputy Assistant Secretary
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803

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

Alvin B. ... *1/3/90*
Clerk Date

AA/jts *AAJ*

Copies furnished to:
Harold L. Culp, P.E.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on *1-3-90* to the listed persons, by *D. Jones*.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF PERMIT

Reedy Creek Improvement District
Post Office Box 36
Lake Buena Vista, Florida 32830

Attention: Thomas M. Moses, District Administrator

Orange County - AP
GE Gas Fired Turbine Generator with Heat Recovery System

Dear Mr. Moses:

Enclosed is Permit Number AO48-170280, dated 2/15/91, to change the permit conditions, issued pursuant to Section 403.087, Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing), unless the right to petition has been waived. The petition must conform to the requirements of Chapters 17-103 F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within that time constitutes a waiver of any right such person has to an administrative determination pursuant to 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.

2/17. P... B
K... B
W... Ed
D... Willard

EG: BILL BROCK
FRANK JONES
BOB KINDLE

This Order (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 paragraph. Upon the timely filing of a petition this Permit will not be effective until further Order of the Department.

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 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 REGULATION

cm c Richard B. Alexander

for A. Alexander
Deputy Assistant Secretary
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803

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

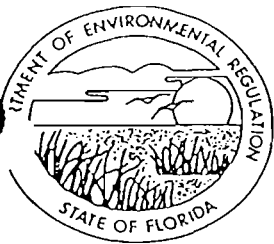
Gene B. Dawkins 2/15/91
Clerk Date

AB
AA/jtj *27*

Enclosure

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 2-13-91 to the listed persons, by D. J. [Signature].



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

Reedy Creek Improvement District
Post Office Box 36
Lake Buena Vista, Florida 32830

Attention: Thomas M. Moses, District Administrator

Orange County - AP
GE Gas Fired Turbine Generator with Heat Recovery System
Permit No. AO48-170280
Change of Conditions

Dear Mr. Moses:

We are in receipt of your request for a change of the permit conditions.
The conditions are changed as follows:

CONDITION

Permit Specific Condition No. 9

FROM:

9. Annual compliance testing conducted annually from the date of February 1, 1989 shall be conducted with the fuels used in the preceding 12 month period using:
1. EPA Method 20 for NO_x and SO₂
 2. EPA Method 10 for CO
 3. EPA Method 5 for PM
 4. EPA Method 9 for VE

Other DER approved methods may be used for compliance testing only after prior Departmental approval.

TO:


9. Annual compliance testing conducted annually from the date of February 1, 1989 shall be conducted with the fuels used in the preceding 12 month period using:
1. EPA Method 20 for NO_x and SO₂
 2. EPA Method 10 for CO
 3. EPA Method 17 for PM
 4. EPA Method 9 for VE

Other DER approved methods may be used for compliance testing only after prior Departmental written approval.

All other conditions remain the same.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

cmc 

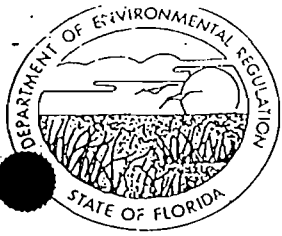
A. Alexander, P.E.

for Deputy Assistant Secretary

2/15/91

Date

AB
AA:jtj *37*



Florida Department of Environmental Regulation

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

Lesion Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF PERMIT ISSUANCE

Reedy Creek Improvement District
Post Office Box 10,170
Lake Buena Vista, Florida 32830-0170

Attention: Thomas M. Moses, District Administrator

Orange County - AP
GE Gas Fired Turbine Generator
with Heat Recovery System
Permit No. A048-170280

Dear Mr. Moses:

Enclosed is Permit Number A048-170280 to change the permit conditions, 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 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; 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.

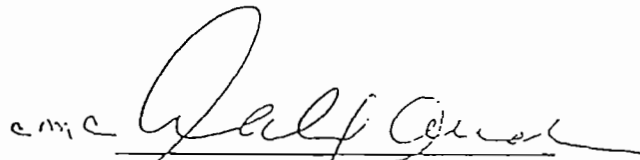
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard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



A. Alexander
District Director
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803

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

A. Lalonde *8/9/91*
Clerk Date

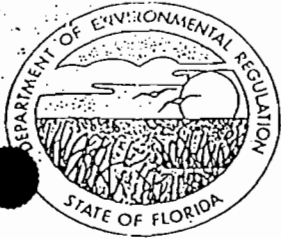
aj
AA/jtt

Copies furnished to:

Edward Godwin, P.E. ✓

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies
were mailed before the close of business on *August 13, 1991* to the
listed persons, by *Sherrin Bouldin*.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

Reedy Creek Improvement District
Post Office Box 10,170
Lake Buena Vista, Florida 32830-0170

Attention: Thomas M. Moses, District Administrator

Orange County - AP
GE Gas Fired Turbine Generator
with Heat Recovery System
Permit No. A048-170280
Change of Conditions

AO
Mod
for
SO₂

Dear Mr. Moses:

We are in receipt of your request for a change of the permit conditions. The permit conditions are changed as follows:

Specific Condition No. 5

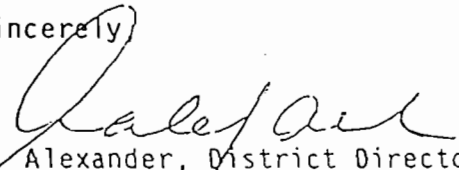
The only change affects sulfur dioxide (SO₂) under "Gas Fired", in which the maximum allowable emissions limit is changed from 0.2 lb/hr and 0.8 TPY to 1.2 lbs/hr and 5.1 TPY.

All other conditions remain the same.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

cmc


A. Alexander, District Director

8-13-91
Date

AA/jtt

Copies to:

Edward Godwin, P.E.