



Technical Services, Inc.

November 29, 1996

Mr. Mike Harley
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Kissimmee Utility Authority - Cane Island Facility
Permit Number: AC49-205703
Use of RATA test data for compliance purposes

Dear Mr. Harley:

As we discussed on Tuesday, Kissimmee Utility Authority wishes to use nitrogen oxide emissions data collected as part of their annual RATA testing requirement for the purpose of demonstrating compliance with their NO_x emission standard. We understand that this is allowed by federal rules and FDEP policy and we wish to pursue this possibility as part of the pending request to modify the testing requirements of this permit.

The 20-30 minute tests conducted for the RATA testing will be strung together in a manner that fulfills additional requirements of EPA Methods 10 and 20 as to test run time and O₂ stratification investigation. The collected data will be bias corrected to comply with the RATA requirements, but will not be bias corrected for compliance with NSPS. No less than eight test points will be used for the RATA testing. Essentially, the testing will be done by EPA method 20 and the data will simply be reported differently to comply with the two separate requirements.

Please advise us if this request is acceptable to you and if it will require approval of an alternate sampling procedure so that we may complete the pending modification request for this permit. Thank you for your help in this matter. Please call me at (407) 859-7374 or Steve Neck at (352) 335-1889 if you have any questions.

Very truly yours,

PERIGEE TECHNICAL SERVICES, INC.

A handwritten signature in black ink, appearing to read "J. Guidry".

Jerome J. Guidry, P.E., Q.E.P.
President

JJG:emc

cc: Steve Neck
Jeff Ling
A. K. Sharma
Gary Kuberski

harley.ltr/197.0