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A.K. (BEN) SHARMA, P.E.
DIRECTOR OF POWER SUPPLY



P.O. BOX 423219 KISSIMMEE, FLORIDA 34742-3219
(407) 933-7777 FAX: (407) 847-0787

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MAILROOM # 2

January 18, 1996

A. A. Linero, P.E.
Administrator
Bureau of Air Regulation
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Ref: Permit AC49-205703

Dear A.A. Linero:

In reference to your letter dated January 3, 1996, enclosed herewith is a check for \$250.00 to amend permit AC94-205703.

Sincerely,

Ak Sharma

A.K. (Ben) Sharma, P.E.
Director of Power Supply

AKS/ne

Enclosure:



Lawton Chiles
Governor

Department of Environmental Protection

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

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JAN 9 1996

POWER SUPPLY DEPT.

Virginia B. Wetherell
Secretary

January 3, 1996

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. A. K. Sharma, P.E.
Director of Power Supply
Kissimmee Utility Authority
Post Office Box 423219
Kissimmee, Florida 34741-3219

Dear Mr. Fields:

The Bureau of Air Regulation received your request dated November 2, 1995 to amend permit AC49-205703 issued to Kissimmee Utility Authority (KUA). Before we can begin processing your request, we need a \$250 processing fee, according to Rule 62-4.050(4) (q) 4.

If you have any questions, please call Kanani K. Winans at (904)488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
Bureau of Air Regulation

AAL/kw



BLACK & VEATCH

8400 Ward Parkway, P.O. Box No. 8405, Kansas City, Missouri 64114, (913)321-2000

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BUREAU OF
AIR REGULATION

Kissimmee Utility Authority
Cane Island Power Park

B&V Project 25438.031
B&V File 32.0000
November 2, 1995

Florida Department of Environmental Protection
Twin Towers Office Bldg
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Sulfur Testing Methods

Attention: Mr. C. H. Fancy

Gentlemen:

Kissimmee Utility Authority (KUA) is currently operating its Cane Island Power Park Units 1 and 2 under the valid authority to construct (ATC) permit no. AC49-205703. Specific Condition No. 8 of the permit requires that initial and annual stack emissions testing be conducted in accordance with listed methods for sulfur dioxide (SO₂) emissions. The listed test methods include EPA Method 20 (Specific Condition 8) or ASTM Method D4294 (Specific Condition 10). In addition, Specific Condition 19, by requiring compliance with 40 CFR 60 Subpart GG provisions, requires that fuel sulfur content be measured using ASTM Method D2880-71. Black & Veatch, on behalf of KUA, is requesting that FDEP allow the fuel sulfur content of the fuel oil to be sampled utilizing only one method, namely ASTM Method D4294, instead of the two separate methods listed in the permit. gk

Background

Kissimmee Utility Authority (KUA) notified the central and district FDEP offices that stack testing to demonstrate emissions compliance would be performed on the Unit 1 and 2 stacks at the Cane Island Power Park, beginning on November 14, 1995. KUA met with the central district office on October 12, 1995, to discuss the stack testing procedures to be used for the emissions compliance testing. During this meeting it was requested that the FDEP allow the testing of sulfur in the fuel oil to be performed with only one method. The central district office stated that this request would have to be approved by the Tallahassee FDEP office.

Florida Department of Environmental Protection
Mr. C. H. Fancy

B&V Project 25438.031
November 2, 1995

ASTM Methods

The ASTM method required by NSPS Subpart GG for fuel oil testing (D2880-71) was superceded in 1994 by ASTM Method D2880-94, which is currently the standard specification for combustion turbine fuel oil testing. This fuel specification lists, among others, D4294 as an acceptable method for measuring sulfur content in fuel oil. Method D4294, "the Standard Test Method for Sulfur in Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectroscopy," is suitable for distillate fuel oils having sulfur contents in the range of 0.05 percent, by weight.

Black & Veatch requests that you provide your approval in writing to Mr. A. K. Sharma at the address below prior to the initial test date. If you have any questions please call me at 913-339-7425.

Director of Power Supply
Kissimmee Utility Authority
1701 W. Carroll Street
Kissimmee, FL 34741

Very truly yours,

BLACK & VEATCH



A. L. Carlson

bj

cc: Mike Harley, FDEP
Chuck Collins, FDEP
A. K. Sharma, KUA