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July 8, 1997

State of Florida
Department of Environmental Protection
Emissions Monitoring Section
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attn: Mr. M.D. Harley, P.E., DEE

Administrator

Re: Okeelanta Power Limited Partnership

Sulfuric Acid Mist Emission Testing

Dear Mr. Harley:

In a letter dated December 5, 1996, Okeelanta Power requested that Specific Condition #21 of our PSD permit be amended to delete Sulfuric Acid Mist (SAM) as an emission compliance test parameter and also remove the emission limit for SAM from Specific Condition #20. This request was based on the premise that testing for SAM was inappropriate for a biomass fired facility with high flue gas moisture and other interfering constituents such as ammonia.

In a letter dated April 16, 1997, FDEP retained the sulfuric acid mist emission standard for the facility and adopted the modified Method 8 test procedure as described by Clean Air Engineering.

Michelle Golden, an Environmental Manager for U.S. Generating Company, spoke with you recently at the FDEP Power Conference in Orlando regarding the SAM issue at Okeelanta and Osceola Cogeneration Plants. Based on your discussion it appears there still may be a possibility for removing SAM as a emission test parameter. If so, please advise so that I may take the appropriate course of action to make it happen. I have attached the previous correspondence on this issue for your review. Both Okeelanta and Osceola Cogeneration Plants are affected by the SAM permit requirement and therefore relief is sought for both facilities.

If you have any questions please contact me at (561) 993-1003.

Sincerely,

James M. Meriwether Environmental Manager

cc: (Al Linero - FDEP/Tallahassee)

Ajaya K. Satyal - PBCHD

JMG

J. Roberson

M. Keegan

C. McDavid