

File

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April 26, 1996

Willard Hanks  
Department of Environmental  
Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Twin Towers Office Building  
Tallahassee, Florida 32399

RECEIVED  
APR 26 1996  
BUREAU OF  
AIR REGULATION

Re: Permit Amendment for Okeelanta  
and Osceola Cogeneration Facilities

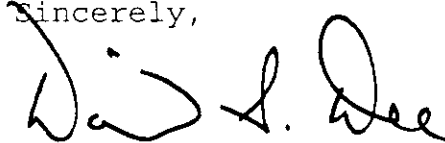
Dear Willard:

As you know, Okeelanta Power Limited Partnership (Okeelanta Power) and Osceola Power Limited Partnership (Osceola Power) requested permit amendments to allow the simultaneous operation of their cogeneration facilities and the related sugar mills during the 1996-97 crop season. To supplement their requests for permit amendments, I have identified the specific changes that should be made to the Okeelanta Power and Osceola Power permits. My recommended language for the permit amendments is attached to this letter.

For your convenience, I have also attached a computer diskette which contains: (a) the current permit language for each cogeneration facility; (b) the proposed permit changes, which are shown with underlining and strike-throughs; and (c) a "clean" version of each permit, as amended. The permit conditions are presented in WordPerfect 6.0 format.

I hope this information is helpful to you. Please call me if you have any questions.

Sincerely,



David S. Dee

ORIGINAL VERSION

SPECIFIC CONDITIONS FOR OSCEOLA PERMIT:

17. During the first three years of commercial cogeneration facility operation, the existing Boilers Nos. 2, 3, 4, 5, and 6 (Permit Nos. AC 50-203679, 165813, 203680, 165626, and 165814, respectively), may be retained for standby operation provided their operating permits are valid.

During the period from initial firing to commercial operation, both cogeneration boilers can be operated simultaneously with the existing boilers. Only biomass and No. 2 fuel oil may be used in the cogeneration boilers during this period. If more than 570,000 lb/hr steam, (24-hour average) is generated in the cogeneration boilers, steam in excess of 570,000 lb/hr (24-hour average) must be sent to the Osceola sugar mill, and the existing boiler's steam production reduced by an equivalent amount. This period shall not exceed a total duration of 12 months. During this 12 month period, simultaneous operation of the existing boilers and the cogeneration boilers shall not occur on more than a total of 120 calendar days. After the first year of cogeneration facility operation, the existing boilers may be operated only when both new cogeneration boilers are shutdown. During operation, the existing boilers must meet all requirements in the most recent construction and operation permits for the boilers. These existing boilers shall be shutdown and rendered incapable of operation within three (3) years of commercial startup of the cogeneration facility, but no later than January 1, 1999.

/OSCE1

VERSION WITH UNDERLINING AND ~~STRIKE THROUGH~~

SPECIFIC CONDITIONS FOR OSCEOLA PERMIT:

17. During the first three years of commercial cogeneration facility operation, the existing Boilers Nos. 2, 3, 4, 5, and 6 (Permit Nos. AC 50-203679, 165813, 203680, 165626, and 165814, respectively), may be retained for standby operation provided their operating permits are valid.

During the period from initial firing through April 1, 1997 ~~to commercial operation~~, both cogeneration boilers can be operated simultaneously with the existing boilers. Only biomass and No. 2 fuel oil may be used in the cogeneration boilers during this period. If more than 570,000 lb/hr steam, (24-hour average) is generated in the cogeneration boilers, steam in excess of 570,000 lb/hr (24-hour average) must be sent to the Osceola sugar mill, and the existing boiler's steam production reduced by an equivalent amount. ~~This period shall not exceed a total duration of 12 months. During this 12 month period, simultaneous operation of the existing boilers and the cogeneration boilers shall not occur on more than a total of 120 calendar days. After April 1, 1997 the first year of cogeneration facility operation,~~ the existing boilers may be operated only when both new cogeneration boilers are shutdown or in the process of shutting down. During operation, the existing sugar mill boilers must meet all requirements in the most recent construction and operation permits for the boilers. These existing sugar mill boilers shall be shutdown and rendered incapable of operation within three (3) years of commercial startup of the cogeneration facility, but no later than January 1, 1999.

/OSCE1B

"CLEAN" VERSION

SPECIFIC CONDITIONS FOR OSCEOLA PERMIT:

17. During the first three years of commercial cogeneration facility operation, the existing Boilers Nos. 2, 3, 4, 5, and 6 (Permit Nos. AC 50-203679, 165813, 203680, 165626, and 165814, respectively), may be retained for standby operation provided their operating permits are valid.

During the period from initial firing through April 1, 1997, both cogeneration boilers can be operated simultaneously with the existing boilers. Only biomass and No. 2 fuel oil may be used in the cogeneration boilers during this period. If more than 570,000 lb/hr steam (24-hour average) is generated in the cogeneration boilers, steam in excess of 570,000 lb/hr (24-hour average) must be sent to the Osceola sugar mill, and the existing boiler's steam production reduced by an equivalent amount. After April 1, 1997, the existing boilers may be operated only when both new cogeneration boilers are shutdown or in the process of shutting down. During operation, the existing sugar mill boilers must meet all requirements in the most recent construction and operation permits for the boilers. These existing sugar mill boilers shall be shutdown and rendered incapable of operation within three (3) years of commercial startup of the cogeneration facility, but no later than January 1, 1999.

/OSCE2