



Lawton Chiles, Governor

James T. Howell, M.D., M.P.H., Secretary

July 1, 1997

Al Linero, PE
Administrator - New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Re: Osceola Power Limited Partnership
Permit Modification of NOx Emissions Limits**

Dear Mr. Linero:

This facility recently contacted me and indicated that they were preparing an application to modify the NOx emission limiting standard from 0.12 lb NOx per mmBTU to 0.15 lb NOx per mmBTU. This revised limit would be consistent with the sister cogeneration plant, Okeelanta Power Limited Partnership. I offer the following comments:

- The request would result in an increase in potential emissions.
- The initial NOx emission limiting standard was the result of the Department's "NOx RACT Determination" for this facility back in 1993. My recollection is that the ERC determined that NOx RACT could not be applied on a case-by-case basis. The Department was required to re-write the major source NOx RACT rule in general terms for specific types of equipment. Should the Department revise this rule to include the cogeneration boilers?
- Due to the similarity of the boilers and fuels, I can think of no reason why the NOx emission limiting standard shouldn't be the same.

Thank you for the opportunity to comment on this issue. If you have any questions, please contact me at the numbers below.

Sincerely,

For the Division Director
Environmental Health and Engineering

A handwritten signature in cursive script, reading "Jeffery F. Koerner".

Jeffery F. Koerner, PE
Air Pollution Control Section

Phone: (561) 355-4549 SunCom: 273-4549

FAX: (561) 355-2442

Filename: LINERO_2.LTR

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**BUREAU OF
AIR REGULATION**



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Waiting on a ^{7/2} new
request - then
start a new
file -

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