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MAY 08 1997

**BUREAU OF
AIR REGULATION**

May 6, 1997

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

Attn: Mr. A.A. Linero, P.E.
Administrator
New Source Review Section

Re: Okeelanta Power Limited Partnership
PSD-FL-196D, 0990332-003-AC

Dear Mr. Linero:

I am in receipt of your letter to Mr. David Buff of Golder Associates, dated April 30, 1997, which requests a \$50.00 fee to process the requested permit amendment. The amendment would extend the expiration date of the above listed permit to allow time to conduct the tire derived fuel (TDF) test burn. Please see enclosed check #5457 in the amount of \$50.00 to cover the processing fee. If you have any questions please contact me at (561) 993-1003.

Sincerely,

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

James M. Meriwether
Environmental Manager

cc: Ricardo Lima
Jerome Ketterling
David Buff
David Dee



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 30, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Buff, P.E.
Principal Engineer
Golder Associates
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

Re Osceola Power, L.P. PSD-FL-197D 0990331-003-AC
Okeelanta Power, L.P. PSD-FL196D 0990332-003-AC

Dear Mr. Buff:

The Bureau of Air Regulation received your requests dated April 23, 1997 to extend the expiration dates of the above listed permits to allow time to conduct the tire derived fuel (TDF) test burn. Before we can begin processing these requests, we will need a \$50 processing fee for each permit extension (\$100 total). If you have any questions, please call Willard Hanks at (904) 488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/wh

cc: Mr. Don Schaberg, OsPLP
Mr. Dennis Space, OkPLP

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
 ■ Complete items 1 and/or 2 for additional services.
 ■ Complete items 3, 4a, and 4b.
 ■ Print your name and address on the reverse of this form so that we can return this card to you.
 ■ Attach this form to the front of the mailpiece, or on the back if space does not permit.
 ■ Write "Return Receipt Requested" on the mailpiece below the article number.
 ■ The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
 1. Addressee's Address
 2. Restricted Delivery
 Consult postmaster for fee.

3. Article Addressed to:
 MR. DAVID A. BUFF, P. E.
 GOLDER ASSOCIATES
 6241 NW 23rd St. Suite 500
 Gainesville, FL 32653-1500

4a. Article Number
 P 265 659 198

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 5/2/97

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 X M. Reinert

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 198

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to David A. Buff	
Street & Number 6241 NW 23rd St. Ste 500	
Post Office, State, & ZIP Code Gainesville, FL 32653-1500	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 4-30-97	
Fee Request Okada/Okamoto 1970/1960	

PS Form 3800, April 1995

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



April 23, 1997

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Okeelanta Power Limited Partnership (OkPLP) Cogeneration Facility
Permit Amendment No. 0990332-003-AC, PSD-FL-196A
Tire-Derived Fuel Permit Amendment

Dear Mr. Fancy:

OkPLP received a permit amendment on January 22, 1997, to allow a test burn of tire-derived fuel (TDF) at one boiler located at either OkPLP or the Osceola Power Limited Partnership (OsPLP) cogeneration facility. Specific Condition (S.C.) 11 of the amendment extends the existing construction permit until July 1, 1997, in order to allow time to complete the test burn. Performance testing is to be conducted for up to 60 calendar days, and within a 90-day period from the time that TDF is first introduced into a boiler, as specified in S.C. 2 and 16.

OkPLP currently plans to begin firing TDF at the OkPLP facility during May. At present, the dates of performance testing cannot be established since the facility must first gain some operating experience with the TDF. Once the facility operators are comfortable with the operations, performance testing will be conducted (after proper notice to the FDEP). Assuming that TDF firing first occurs in May, TDF firing could occur as late as August 31, 1997, depending on plant operations, testing schedules, etc.

Based on the above described schedule, it is requested that the TDF test burn authorization be extended until August 31, 1997. This date should allow the time to complete the performance testing. Thank you for consideration of this request. Please call if you have any questions concerning this request.

Sincerely,

A handwritten signature in cursive script that reads 'David A. Buff'.

David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011
SEAL

DB/arz

cc: James Meriwether
File (2)

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APR 25 1997

BUREAU OF
AIR REGULATION

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

January 17, 1997

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400



NOI/REGULATION
BUREAU OF

JAN 21 1997

RECEIVED

Re: Draft Permit Amendment No. 0990332-003-AC (PSD-FL-196A)
Okeelanta Power Limited Partnership (OkPLP) Cogeneration Facility
Tire-Derived Fuel Project

Dear Mr. Fancy:

OkPLP has received the draft permit amendment to allow a test burn of tire-derived fuel (TDF) at one boiler located at either OkPLP or the Osceola Power Limited Partnership (OsPLP) cogeneration facility. OkPLP is in agreement with the draft permit amendment conditions but would like to add further clarification in a few areas.

The first point concerns the wording in the second paragraph of the amendment letter, preceding the specific conditions. The wording states that OkPLP is authorized to conduct performance tests on one boiler. However, we would like to clarify that, due to the common fuel feed system for all three boilers at the OkPLP facility, the wood waste/TDF blend will be fired in all three boilers during the testing, although only one boiler will be performance tested. OkPLP is evaluating the fuel feed system to determine if it is feasible to fire only one boiler with the TDF blend. If this becomes feasible, OkPLP will fire only one boiler with the TDF blend during the performance testing. However, at present we would like to keep the options open in the event that all three boilers must be fired with the TDF blend.

In regards to Kathy Anderson's proposed rewording of Specific Condition 4 of the draft amendment letter, the rewording is acceptable except in regards to duplicate analysis of the ash for organics and PCDD/PCDF [Conditions 4(c) and 4(d)]. This duplicate analysis is considered unnecessary, particularly considering that organic constituents and PCDD/PCDF are not expected in the ash in high concentrations, and the extremely high cost of performing PCDD/PCDF analysis (\$1,500 per sample). Therefore, we request that only one sample of each the bottom ash and fly ash be analyzed. In order to alleviate concerns over an invalid test result with only one sample, composite sample material will be retained for additional analysis. If the initial analysis results are considered to be invalid for some reason, an additional analysis could then be performed.

The last point is in regards to Specific Conditions 9 and 13 of the draft letter, which relates to calculating emissions changes for rule applicability. It is my understanding, based on Florida rules (i.e., definition of modification), that if the test burn demonstrates that the current permit limits for OkPLP are not exceeded, then a modification would not be triggered, and PSD review would not apply. Based on Florida rules, since the facility is under a construction permit and has not begun normal operations (i.e., no 2-year operating history), actual emissions would equal potential

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Mr. Clair Fancy, P.E.
Page 2
January 17, 1997

(permitted) emissions. Therefore, if permitted emissions are not increased, then there will be no increase in actual emissions.

Thank you for consideration of these comments. Please call if you have any questions concerning this request.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011

SEAL

DB/vjp

cc: James Meriwether
File (2)

cc: Willard Hanks, BAR
SED
Palm Bch Co.

9737509A/01