

December 5, 1996

State of Florida
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attn: Mr. Clair Fancy

Re: Okeelanta Power Limited Partnership
AC50-219413/PSD-FL-196
Sulfuric Acid Mist
Minor Permit Amendment

Dear Mr. Fancy:

Okeelanta Power Limited Partnership (OkPLP) is requesting the Florida Department of Environmental Protection (FDEP) to amend Specific Condition #21 of our PSD permit to delete Sulfuric Acid Mist (SAM) as an emission compliance test constituent. We also request FDEP to remove the emission limit for SAM from Specific Condition #20.

OkPLP is the owner of the Okeelanta Cogeneration Plant located in Palm Beach County - South Bay, Florida. The Okeelanta Cogeneration Plant is a 74.9 megawatt electric cogeneration facility which utilizes biomass (clean wood waste material and bagasse) as the primary fuel and No. 2 low sulfur fuel oil as startup and supplementary fuel. The facility is permitted to burn low sulfur coal as an alternative fuel, however, coal is not currently utilized as a plant fuel source.

The cogeneration plant consists of three ABB steam boilers with a design heat input for each boiler of 715 MMBtu/hr on biomass and 490 MMBtu/hr on fuel oil. Each boiler will produce approximately 455,400 lbs/hr steam at 1,500 psig and 975 degrees F. Particulate matter, nitrogen oxides, and mercury emissions from each boiler are controlled by electrostatic precipitators, selective non-catalytic reduction, and carbon injection, respectively.

The initial emission compliance tests were conducted in May and June 1996. During these stack tests several SAM tests were conducted using the permitted EPA Method 8. The erratic results of these tests were determined to be invalid due to probable interferences from urea and chlorides and high moisture content in the flue gas. The testing contractor,

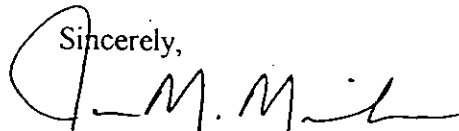
Clean Air Engineering, had experienced this problem before and recommended using a Modified Method 8. Three runs of Modified Method 8 were conducted in an attempt to achieve valid results. These results along with the initial test results were reported to the Department. Since Modified Method 8 was not an approved alternate method the test results were not accepted.

Due to problems with Method 8 at the Okeelanta Cogeneration Plant there is concerns about compliance with our current permit conditions. During subsequent discussions on this issue with Mr. Michael Harley (FDEP BAR) it was determined that the requirement to test for SAM may be deleted through a minor permit amendment. EPA Method 8 was developed for sulfuric acid plants where the flue gas is dry and free of interference and therefore not appropriate for a biomass fired facility.

In summary, OkPLP is withdrawing our previous request for approval of Modified Method 8 as an alternative procedure and now requests that a minor permit amendment be made to PSD-FL-196. Specifically, we are requesting that Specific Condition #21 of our PSD permit be amended to delete SAM as an emission compliance test constituent and also remove the emission limit for SAM from Specific Condition #20. I have enclosed a check in the amount of \$250.00 to cover the processing fee.

If you have any question or require additional information please contact me at (561) 993-1003.

Sincerely,



James M. Meriwether
Environmental Manager

cc: David Knowles - FDEP/Ft. Myers
Ajaya Satyal - PBCHD
Michael Harley - FDEP/TLH
D. Space - OkPLP
G. Cepero - OC
J. Ketterling - USOSC
D. Beckham - USGen
D. Dee - L&P