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Jeb Bush
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October 15, 1999

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BUREAU OF AIR REGULATION

Mr. Clair Fancy, P.E.
Bureau Chief
Bureau of Air regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station 5505
Tallahassee, Florida 32399-2400

Re: Osceola Power Limited Partnership, FDEP File Nos. 0990331-007-AC & PSD-FL-197
Okeelanta Power limited Partnership, FDEP File Nos. 0990332-010-AC & PSD-FL-196
September 28, 1999 Requests for Extensions to Sugar Mill Boiler Shut Down Dates

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Dear Mr. Fancy,

As you are aware, the above facilities were reviewed under the PSD regulations based on net emission increases below the significant levels for carbon monoxide (CO), oxides of nitrogen (NOx), particulate matter (PM) and volatile organic compounds (VOC). The actual emissions data for each facility are presented in Tables 1 and 2 for the past two years (1997 & 1998). As can be seen within the tables, emissions of CO, PM and VOC are significantly higher than the levels presented within the initial PSD applications. In addition, CO and VOC emissions for the period have been higher than the baselines.

Pollutant	Baseline (TPY)	PSD Permit (TPY)	1997 (TPY)	1998 (TPY)
CO	5992.3	1225	6028	7467
NOx	437.8	436.5	494	345
PM	357.7	109.3	276	315
SO2	178.5	1071.5	248	275
VOC	208.6	210	459	244

Pollutant	Baseline (TPY)	PSD Permit (TPY)	1997 (TPY)	1998 (TPY)
CO	10388	2012.5	10236	7415
NOx	888.7	862.5	757.13	620.41
PM	473.7	177.3	402.7	307.39
SO2	748.3	1700	219.8	206.1
VOC	401.9	345	802.13	656.84

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The September 28, 1999 requests to amend Specific Condition No. 17 (SC #17) would allow this trend to continue for another 3 years if approved. Under the initial SC #17, operation of the cogen boilers was to be phased in over a 3-year period with the sugar mill boilers retained as standby units during this period. At the end of the 3-year period, the sugar mill boilers were to be shut down (Drop Date of 1/1/99). The focus of SC #17 was to allow operational flexibility and security to the sugar mills while ensuring that the netting analyses were federally enforceable. With the continued problems associated with the cogen facilities, it is not recommended that the Department amend the condition as requested.

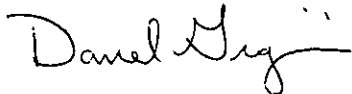
It is recommended that the Department amend SC #17 to allow use of the cogen boilers and existing boilers with an additional requirement to meet daily and annual facility wide emission caps. For your information, the facilities have requested a "Bubble" within the initial Title V permit applications. The daily and annual emission caps should be based on the information presented within the PSD permit applications for the cogen facilities. Emissions in excess of these levels should be addressed through the enforcement program with formal compliance plans required within each Title V operating permit. It is believed that this approach is consistent with the PSD and Title V programs.

Because the 3-year period following initial firing has passed, it is requested that as a minimum SC #17 be amended to require the maximum use of the cogen boilers to offset steam requirements at the sugar mills.

If you have any other questions, please contact me at (561) 355-3136.

Sincerely,

For the Division Director
Environmental Health and Engineering



Darrel Graziani, PE
Air Pollution Control Section