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April 22, 1998

Al Linero, P.E.
Department of Environmental
Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399

COPY

Re: Okeelanta Power Cogeneration Facility

Dear Mr. Linero:

I am sending you this letter to confirm the information I provided to you during our discussions on April 16 and 22, 1998.

On March 25, 1998, the Florida Department of Environmental Protection ("DEP") gave notice of its intent to issue a permit modification (No. 0990332-009-AC; PSD-FL-196) for the Okeelanta Power Limited Partnership's ("Okeelanta Power") cogeneration facility in Palm Beach County, Florida. On behalf of Okeelanta Power, I am submitting the following comments concerning the Department's notice and draft permit modification.

Publication of Notice

The first page, second paragraph, of the Department's "Public Notice of Intent to Issue Air Construction Permit Modification" should be revised and clarified by replacing the current language with the following statement:

"The modification will allow an additional two years for concurrent operation of Okeelanta Power's cogeneration facility and the adjacent sugar mill's boilers to provide Okeelanta Power Limited Partnership with an opportunity to fine tune and perfect the interconnected operations between the cogeneration facility and the sugar mills."

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Modified Permit Conditions

The language in the draft permit modification should be revised and clarified in the manner shown below.

1. The first sentence in Specific Condition No. 17 should state that:

"The existing Boilers . . . may be retained for standby operation until the interconnection between the cogeneration facility and sugar mill is perfected, but no later than April 1, 2000, provided their operating permits are valid."

2. The last sentence in Specific Condition No. 17 should state that:

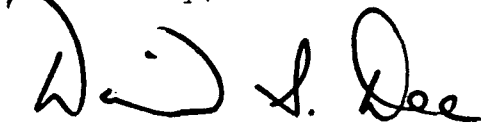
"These existing boilers at the sugar mill shall be shutdown and rendered incapable of operation after fine-tuning of interconnected operations has been completed, but no later than April 1, 2001."

3. The first sentence in Specific Condition No. 26 should state that:

"Stack monitoring, fuel usage, fuel analysis data, and the status of the interconnections between the sugar mill and the cogeneration facility shall be reported"

Thank you for your consideration of these comments. Please call me if you have any questions.

Sincerely,



David S. Dee

cc: Willard Hanks ✓