

# AFFIDAVIT OF PUBLICATION

## THE LEDGER

### Lakeland, Polk County, Florida

RECEIVED

APR 25 1996

BUREAU OF AIR REGULATION

Case No .....

STATE OF FLORIDA)  
COUNTY OF POLK)

Before the undersigned authority personally appeared Nelson Kirkland, who on oath says that he is Classified Advertising Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Notice of Intent

in the matter of

Issue Permit Amendment Airls ID 1050223-001-AC

in the

Court, was published in said newspaper in the issues of

February 23;

1996

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed



Nelson Kirkland  
Classified Advertising Manager

by Nelson Kirkland who is  
personally known to me

23rd

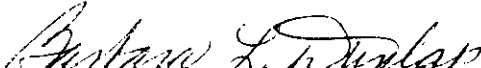
Sworn to and subscribed before me this

February

96

day of ..... A.D. 19

(Seal)



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT  
AIRS ID 1050223-001-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Tiger Bay Limited Partnership, 3219 State Road 630 West, Fort Meade, Polk County, Florida 33841. This amendment is to increase the allowable heat input from 1615 million BTU per hour lower heating value at 27°F to 1710 million BTU per hour to its combustion turbine located at the Tiger Bay Cogeneration facility in Fort Meade. The change will allow the company to continue to generate 184 megawatts of electric power under very low temperature conditions. There will be no increase in allowable air pollution emission limits. Any increase in actual emissions resulting from operating at very low temperature conditions will be minimal and of short duration.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (FS). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, FS.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Fee Number and the county in which the project is proposed.
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action.
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action.
- (d) A statement of the material facts disputed by Petitioner, if any.
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action.
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, FS, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Applic	337.6	371/2	+1
Applic	43.3	3/4	-1/8
Applic	47.8	42 1/2	+2 1/8
Applic	5.6	7 1/2	-1 1/8
Applic	45.0	49 7/8	+2 1/8
Applic	18.7	1 1/8	+1 1/8
Applic	18.7	1 1/8	+1 1/8

Z 127 633 201



### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Mr. Jeffrey J. Fassett  
Senior Plant Engineer  
Tiger Bay Cogen  
3219 State Road 630 West  
Fort Meade, Florida 33841

PS Form 3800, March 1993

Certified Fee	
Special Delivery Fee	
Restrict of Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Is your RETURN ADDRESS completed on the reverse side?

#### SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

#### 3. Article Addressed to:

Mr. Jeffrey J. Fassett  
Senior Plant Engineer  
Tiger Bay Cogen  
3219 State Road 630 West  
Fort Meade, Florida 33841

#### 4a. Article Number

Z 127 633 201

#### 4b. Service Type

- |                                       |   |
|---------------------------------------|---|
| <input type="checkbox"/> Registered   | <input type="checkbox"/> Insured                        |
| <input type="checkbox"/> Certified    | <input type="checkbox"/> COD                            |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

#### 7. Date of Delivery

5-1-96

#### 5. Signature (Addressee)

#### 6. Signature (Agent)

*Jeffrey J. Fassett*

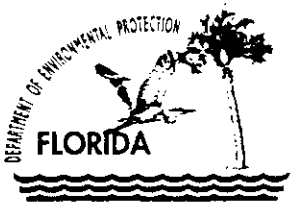
#### 8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991

★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

April 23, 1996

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jeffrey J. Fassett  
Senior Plant Engineer  
Tiger Bay Cogen  
3219 State Road, 630 West  
Fort Meade, Florida 33841

Dear Mr. Fassett:

Re: Amendment of Permits AC53-214903, PSD-FL-190A AIRS ID# 1050223-001-AC  
Tiger Bay Cogen, Combined Cycle Unit

The Department has reviewed your letters dated January 18 and January 24 requesting an increase in the allowable heat input rate to produce 184 MW of electrical power from the combustion turbine. The Department has also received your letter dated February 9 requesting the deletion of the requirement to adjust source test results to ISO conditions for the purpose of BACT compliance. The above referenced permit is hereby amended as follows:

### From:

Specific Condition:

5. The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operation parameters include, but are not limited to:

#### 184 MW Combustion Turbine

- The maximum heat input of 1849.9 MMBtu/hr (LHV) at 27°F and at base load for distillate fuel oil.
- The maximum heat input of 1614.8 MMBtu/hr (LHV) at 27°F and at base load for natural gas.

#### Duct Burner

- The maximum heat input of 100 MMBtu/hr (HHV) of natural gas.

13. During performance tests, to determine compliance with the NO<sub>x</sub> standard, measured NO<sub>x</sub> emissions at 15 percent oxygen will be adjusted to ISO ambient atmospheric conditions by the following correction factor:

$$\text{NO}_x = (\text{NO}_{x \text{ obs}})(P_{\text{ref}}/P_{\text{obs}})^{0.5} e^{19(11\text{obs} - 0.00633)} (288^\circ\text{K}/T_{\text{AMB}})^{1.53}$$

where:

NO<sub>x</sub> = Emissions of NO<sub>x</sub> at 15 percent oxygen and ISO standard ambient conditions

$NO_{x\text{ obs}}$  = Measured  $NO_x$  emission at 15 percent oxygen, ppmv.  
 $P_{\text{ref}}$  = reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere) ambient pressure.  
 $P_{\text{obs}}$  = Measured combustor inlet absolute pressure at test ambient pressure.  
 $H_{\text{obs}}$  = Specific humidity of ambient air at test.  
 $e$  = Transcendental constant (2.718).  
 $T_{\text{AMB}}$  = Temperature of ambient air at test.

**To:**

Specific Condition:

5. The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operation parameters include, but are not limited to:

184 MW Combustion Turbine

- a) The maximum heat input of 1849.9 MMBtu/hr (LHV) at 27°F and at base load for distillate fuel oil.
- b) The maximum heat input of 1710 MMBtu/hr and at base load for natural gas.

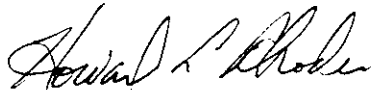
Duct Burner

- c) The maximum heat input of 100 MMBtu/hr (HHV) of natural gas.

13. This condition is deleted. Tests conducted to establish compliance with  $NO_x$  limits which are more stringent than the NSPS standard shall not require an ISO correction (Guidance on Rate of Operation During Compliance Testing for Combustion Turbines dated November 22, 1995).

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC53-214903.

Sincerely,



Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/al/w

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on 4/29/96 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**

**FILED**, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Charlitta J. Hayes 4/29/96  
Clerk Date

Copies to be furnished to:

T. Ellison, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
J. Benedetti, DESTEC

Memorandum

Florida Department of  
Environmental Protection

TO: Howard Rhodes

THROUGH: Clair Fancy *CF*

FROM: Al Linero *Al Linero 4/22*

DATE: April 22, 1996

SUBJ: Tiger Bay Limited Partnership - Amendment of Permit  
AC53-214903, PSD-FL-190~~4~~ AIRS ID# 1050223-001-AC

*al*  
\_\_\_\_\_

Attached for your review and approval is a permit amendment for Tiger Bay Limited Partnership which, upon approval, will amend one permit condition to increase the allowable heat input rate to a 184 MW combustion turbine. The change reflects the actual "capacity versus ambient temperature" curves and will allow the unit to continue to produce 184 MW at low temperatures such as have been recently experienced. There will be no increase in the hourly or annual emissions limitations or in electrical production throughout the rest of the operating ranges.

At the request of Tiger Bay, we also deleted a condition which required correction of NOx emissions for ISO conditions. This is consistent with our guidance on compliance testing of combustion turbines.

If you have any questions, Teresa Heron and I will be glad to discuss the details. We recommend your approval and signature.

AAL/th/w



DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

February 26, 1996

**RECEIVED**

FEB 27 1996

BUREAU OF  
AIR REGULATION

Mr. Al Linero  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**Re: Tiger Bay Limited Partnership  
Amendment of Permit AC53-214903, PSD-FI-190(A)**

Dear Mr. Linero:

I would like to thank you and your staff for processing Tiger Bay Limited Partnership's ("Tiger Bay") request for amendment to the above referenced permits in such an expeditious manner. And for the opportunity to provide written comment as part of the public review process on this permitting action.

I have reviewed your draft language for amending Condition No.5 relating to fuel usage at the gas turbine (Attachment 1) and find the language acceptable.

However, I understand from Ms. Teresa Heron that Tiger Bay's request dated February 9, 1996 (Attachment 2) concerning Condition No.13 and the requirement to adjust source testing results to ISO conditions may not have been received in a timely manner to be included in your draft language. Therefore, Tiger Bay respectfully requests that the amendment to Condition No.13 also be included in this permitting action. Tiger Bay understands that the amendment may consist of the total deletion of the condition.

Again, thank you for your time and consideration into this matter. Your efforts are greatly appreciated. If you have any questions or require any further information please do not hesitate to contact me at (713) 735-4568.

Very truly yours,

Jeanne Benedetti  
Senior Environmental Engineer

Attachments

CC Jeff Fassett

CC: T. Ellison, SWD  
EPA  
NPS  
T. Heron, BAR





# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February xx, 1996

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Jeffrey J. Fassett  
Senior Plant Engineer  
Tiger Bay Cogen  
3219 State Road 630 West  
Fort Meade, Florida 33841

**DRAFT**

Dear Mr. Fassett:

Re: Amendment of Permits AC53-214903, PSD-FL-190(A) - AIRS ID NO. 1050223-001-AC  
Tiger Bay Cogen, Combined Cycle Unit

The Department has reviewed your letters dated January 18 and January 24 requesting an increase in the allowable heat input rate to produce 184 MW of electrical power from the combustion turbine. The above referenced permit is hereby amended as follows:

**From:**  
Specific Condition:

5. The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operation parameters include, but are not limited to:

184MW Combustion Turbine

- a) The maximum heat input of 1849.9 MMBtu/hr (LHV) at 27°F and at base load for distillate fuel oil.
- b) The maximum heat input of 1614.8 MMBtu/hr (LHV) at 27°F and at base load for natural gas.

Duct Burner

- c) The maximum heat input of 100 MMBtu/hr (HHV) of natural gas.

**To:**  
Specific Condition:

5. The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operation parameters include, but are not limited to:

184MW Combustion Turbine

- a) The maximum heat input of 1849.9 MMBtu/hr (LHV) at 27°F and at base load for distillate fuel oil.
- b) The maximum heat input of 1710 MMBtu/hr and at base load for natural gas.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*



Jeffrey J. Fassett  
Page Two

Duct Burner

- c) The maximum heat input of 100 MMBtu/hr (HHV) of natural gas.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit.

Sincerely,

**DRAFT**

Howard Rhodes, Director  
Division of Air Resources  
Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on \_\_\_\_\_ to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

- Copies to be furnished to:
- T. Ellison, SWD
  - J. Harper, EPA
  - J. Bunyak, NPS
  - J. Benedetti, DESTEC

February 9, 1996

(By Facsimile)

Mr. Al Linero  
Florida Department of Environmental Protection  
Air Resource Management  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

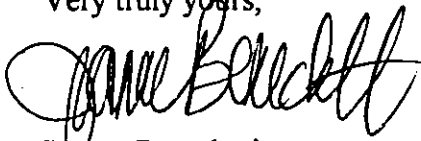
**Re: Tiger Bay Limited Partnership**  
**Permit Number: AC53-214903**  
**Facility ID: AIRS-1050223**

Dear Mr. Linero:

As discussed today with Mr. Martin Costello, Tiger Bay Limited Partnership ("Tiger Bay") would like to request an amendment to Special Condition No.13 of the above referenced permit. The amendment would remove the requirement to adjust source test results to ISO conditions for the purpose of BACT compliance demonstration.

I thank you and your staff for their assistance. If you should have any questions or require any further information please do not hesitate to contact me at (713) 735-4568.

Very truly yours,



Jeanne Benedetti  
Senior Environmental Engineer

CC: Jeff Fassett

G:\1253\CORRESPOLINERO.WPD

2 127 633 167



### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to	
Street No.	
P.O., State and Zip Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	2-19-96
AC53-214903	
P50-FI-190(A)	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> Complete items 1 and/or 2 for additional services. Complete items 3, and 4a & b. • 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
	3. Article Addressed to: Jeffrey Fassett, Sr. Plant Mgr Jewel Bay Cogn 3219 State Rd 630 W H. Meade, FL 33841	4a. Article Number 2 127 633 167
5. Signature (Addressee)	4b. Service Type: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature (Agent) Joaquín M. Alvarez	7. Date of Delivery 2-23-96	
PS Form 3811, December 1991	U.S. GPO: 1993-352-714	8. Addressee's Address (Only if requested and fee is paid)

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 19, 1996

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Jeffrey J. Fassett  
Senior Plant Engineer  
Tiger Bay Cogen  
3219 State Road 630 West  
Fort Meade, Florida 33841

Dear Mr. Fassett:

Re: Amendment of Permits AC53-214903, PSD-FL-190(A). AIRS ID NO. 1050223-001-AC

Attached is one copy of the Proposed Permit Amendment. Intent to Issue and Notice of Intent to Issue Permit Amendment for publication by Tiger Bay for the above referenced emissions unit.

Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P.E., Administrator at the above address. If you have any questions, please call Teresa Heron or Kanani K. Winans at (904) 488-1344.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/th/t

cc: T. Ellison, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
J. Benedetti, DESTEC



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February xx, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Jeffrey J. Fassett  
Senior Plant Engineer  
Tiger Bay Cogen  
3219 State Road 630 West  
Fort Meade, Florida 33841

DRAFT

Dear Mr. Fassett:

Re: Amendment of Permits AC53-214903, PSD-FL-190(A) - AIRS ID NO. 1050223-001-AC  
Tiger Bay Cogen, Combined Cycle Unit

The Department has reviewed your letters dated January 18 and January 24 requesting an increase in the allowable heat input rate to produce 184 MW of electrical power from the combustion turbine. The above referenced permit is hereby amended as follows:

**From:**

Specific Condition:

5. The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operation parameters include, but are not limited to:

184MW Combustion Turbine

- a) The maximum heat input of 1849.9 MMBtu/hr (LHV) at 27°F and at base load for distillate fuel oil.
- b) The maximum heat input of 1614.8 MMBtu/hr (LHV) at 27°F and at base load for natural gas.

Duct Burner

- c) The maximum heat input of 100 MMBtu/hr (HHV) of natural gas.

**To:**

Specific Condition:

5. The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operation parameters include, but are not limited to:

184MW Combustion Turbine

- a) The maximum heat input of 1849.9 MMBtu/hr (LHV) at 27°F and at base load for distillate fuel oil.
- b) The maximum heat input of 1710 MMBtu/hr and at base load for natural gas.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

Jeffrey J. Fassett  
Page Two

**DRAFT**

Duct Burner

- c) The maximum heat input of 100 MMBtu/hr (HHV) of natural gas.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit.

Sincerely,

Howard Rhodes, Director  
Division of Air Resources  
Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on \_\_\_\_\_ to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

Copies to be furnished to:  
T. Ellison, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
J. Benedetti, DESTEC

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the matter of an  
Application for Permit by:

DEP AIRS ID NO. 1050223-001-AC  
Polk County

Jeffrey J. Fassett  
Senior Plant Engineer  
Tiger Bay Cogen  
3219 State Road 630 West  
Fort Meade, Florida 33841

INTENT TO ISSUE PERMIT AMENDMENT

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment (copy attached) to the applicant as detailed in the application/request specified above for the reasons stated below.

The applicant, Tiger Bay Limited Partnership (Tiger Bay), requested that the Department modify Specific Condition No. 5.b. for the facility referenced above located at 3219 State Road 630 West in Fort Meade, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed by certified mail before the close of business on 2-19-96 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Karin Toben                      2-19-96  
Clerk    Date

- Copies to be furnished to:
- T. Ellison, SWD
  - J. Harper, EPA
  - J. Bunyak, NPS
  - J. Benedetti, DESTEC



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT  
AIRS ID 1050223-001-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Tiger Bay Limited Partnership, 3219 State Road 630 West, Fort Meade, Polk County, Florida 33841. This amendment is to increase the allowable heat input from 1615 million Btu per hour lower heating value at 27°F to 1710 million BTU per hour to its combustion turbine located at the Tiger Bay Cogeneration facility in Fort Meade. The change will allow the company to continue to generate 184 megawatts of electric power under very low temperature conditions. There will be no increase in allowable air pollution emission limits. Any increase in actual emissions resulting from operating at very low temperature conditions will be minimal and of short duration.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Department of Environmental Protection  
Southwest District  
3809 Coconut Palm Drive  
Tampa, Florida 33619-8218

Any person may send written comments on the proposed action to Administrator, New Source Review Section at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Memorandum

Florida Department of  
**Environmental Protection**

---

TO: Clair Fancy

THROUGH: A. A. Linero *AAL* 2/16

FROM: Teresa Heron *TH*

DATE: February 16, 1996

SUBJECT: Tiger Bay Limited Partnership - Amendment of Permit  
AC53-214903, PSD-FL-190(A), AIRS ID NO. 1050223-001-AC

Attached for your review and approval is a permit amendment for Tiger Bay Limited Partnership which, upon approval, will amend one permit condition to increase the allowable heat input rate to a 184 MW combustion turbine. The change reflects the actual "capacity versus ambient temperature" curves and will allow the unit to continue to produce 184 MW at low temperatures such as have been recently experienced. There will be no increase in the hourly or annual emissions limitations or in electrical production throughout the rest of the operating ranges.

If you have any questions, Teresa Heron and I will be glad to discuss the details.

AAL/th/w

February 9, 1996

(By Facsimile)

Mr. Al Linero  
Florida Department of Environmental Protection  
Air Resource Management  
2600 Blirstone Road  
Tallahassee, Florida 32399-2400

**RECEIVED**  
FFR 13 1996  
BUREAU OF  
AIR REGULATION

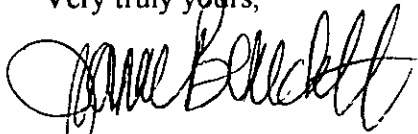
**Re: Tiger Bay Limited Partnership**  
**Permit Number: AC53-214903**  
**Facility ID: AIRS-1050223**

Dear Mr. Linero:

As discussed today with Mr. Martin Costello, Tiger Bay Limited Partnership ("Tiger Bay") would like to request an amendment to Special Condition No.13 of the above referenced permit. The amendment would remove the requirement to adjust source test results to ISO conditions for the purpose of BACT compliance demonstration.

I thank you and your staff for their assistance. If you should have any questions or require any further information please do not hesitate to contact me at (713) 735-4568.

Very truly yours,



Jeanne Benedetti  
Senior Environmental Engineer

CC: Jeff Fassett

G:\1253\CORRESPO\LINERO.WPD



DESTEC ENERGY, INC  
2500 CITYWEST BLVD., SUITE 150  
PO. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

# FACSIMILE TRANSMITTAL

DATE: 2-9, 1996

TOTAL NO. OF PAGES: 2  
including this page

SENT BY: Jeanne Benedetti

DESTEC ENVIRONMENTAL AFFAIRS FAX NO.: (713) 735-4571

PLEASE DELIVER THE FOLLOWING PAGES TO:

PERSON	COMPANY	FAX NUMBER		
<u>Martin Costello</u>	<u>PDEP</u>	<u>(904)</u>	<u>922</u>	<u>6879</u>
_____	_____	( )	_____	_____
_____	_____	( )	_____	_____
_____	_____	( )	_____	_____

PROJECT: Tiger Bay Limited

PROJ. NO.: \_\_\_\_\_

CC: \_\_\_\_\_

FILE NO.: \_\_\_\_\_

SUBJECT: \_\_\_\_\_

MESSAGE: Martin,  
Thank you!  
Jeanne

### CONFIDENTIALITY NOTICE:

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE ADDRESSEE NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS TELECOPY IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TELECOPY IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS ABOVE VIA UNITED STATES POSTAL SERVICE. WE WILL REIMBURSE ANY COSTS YOU INCUR IN NOTIFYING US AND RETURNING THE MESSAGE TO US.

IF THIS TRANSMISSION IS INCOMPLETE, PLEASE CALL (713) 735-4442.





DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

February 9, 1996

(By Facsimile)

Mr. Al Linero  
Florida Department of Environmental Protection  
Air Resource Management  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

**Re: Tiger Bay Limited Partnership**  
**Permit Number: AC53-214903**  
**Facility ID: AIRS-1050223**

Dear Mr. Linero:

As discussed today with Mr. Martin Costello, Tiger Bay Limited Partnership ("Tiger Bay") would like to request an amendment to Special Condition No. 13 of the above referenced permit. The amendment would remove the requirement to adjust source test results to ISO conditions for the purpose of BACT compliance demonstration.

I thank you and your staff for their assistance. If you should have any questions or require any further information please do not hesitate to contact me at (713) 735-4568.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jeanne Benedetti', written over a printed name.

Jeanne Benedetti  
Senior Environmental Engineer

CC: Jeff Fassett

G:\1253\CORRESP\LINERO.WPD

January 24, 1996

**RECEIVED**

JAN 29 1996

BUREAU OF  
AIR REGULATION

Mr. Al Linero  
Florida Department of Environmental Protection  
Air Resource Management  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

**RE: Tiger Bay Limited Partnership**  
**Permit Number: AC53-214903**  
**Facility ID: AIRS-1050223**

Dear Mr. Linero,

It was a pleasure meeting with you and your staff on January 23, 1996 to discuss Specific Condition No.5.b of Tiger Bay Limited Partnership's ("Tiger Bay") air quality permit.

Based on our discussion and a review of potential operating conditions, Tiger Bay would like to propose the following amendment to Specific Condition No.5.b:

"The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operating parameters include, but are not limited to: b) The maximum heat input of ~~1,614.8 MMBtu/hr (LHV) at 27°F~~ 1,710 MMBtu/hr and at base load for natural gas."

Again, thank you very much for your time. It was a pleasure meeting you. If you should have any questions or require further information please do not hesitate to contact me at (941) 285-1200 or Ms. Jeanne Benedetti, Senior Environmental Engineer at (713) 735-4568.

Very truly yours,



Jeffrey J. Fassett  
Senior Plant Engineer

cc: *Deresa Heron*  
*Karani Wirans*

cc: Jeanne Bennedette / Destec  
bcc: Pete Carrizales / Destec  
Robert Chatham / Destec  
Chuck Cook / Destec  
Bob Pope / GE  
J.D. Sellers / Destec  
Vern Staub / Destec



January 18, 1996

TIGER BAY COGEN  
3219 STATE RD., 630 WEST  
FORT MEADE, FL 33841  
(813) 285-1200 FAX (813) 285-1206

Mr. Al Linero  
Florida Department of Environmental Protection  
Air Resource Management  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

**RECEIVED**  
JAN 23 1996  
BUREAU OF  
AIR REGULATION

**RE: Tiger Bay Limited Partnership  
Permit Number: AC53-214903  
Facility ID: AIRS-1050223**

Dear Mr. Linero,

As we discussed on January 17, 1996, I submit on behalf of Tiger Bay Limited Partnership ("Tiger Bay"), the following proposed amendment to Specific Condition No. 5.b. of the permit referenced above (Attachment 1). Attached you will find the required \$250.00 filing fee and documentation supporting the request.

Specific Condition No. 5.b. states:

"The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operating parameters include, but are not limited to: b) The maximum heat input of 1,614.8 MMBtu/hr (LHV) at 27°F and at base load for natural gas."

On January 16, 1996, Tiger Bay discovered that while operating at base load and in compliance with permitted emissions limitations, we were consuming fuel at a rate that was within 0.5% of the rate allowed by our permit. We feel that this was in the accuracy of our installed plant instrumentation but allows no room for any deviation without reducing plant load.

Tiger Bay requests the deletion Specific Condition No. 5.b. in its entirety. This proposed modification does not include any change in the emission limits contained in Table I of the permit.

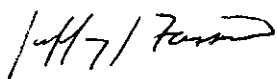
The following is offered in support of this amendment:

- 1) The configuration, plant operating history (continuous emission monitoring data), quarterly reports, and annual source test data has demonstrated that the turbine continuously operates well below the permitted emission limitations.

- 2) In accordance with the Specific Conditions, No.14, Tiger Bay provided your office with the manufacturer's capacity versus temperature (ambient) curve with the compliance test results (Attachment 3). Please note that this curve, dated April 18, 1991, was developed by the manufacturer three and a half (3 1/2) years prior to Tiger Bay reaching achieved operation. The curve was based on theoretical data, since there were no similar units operating at the time Tiger Bay was permitted. Consequently, this curve does not reflect the actual operating parameters of Tiger Bay's gas turbine.
- 3) There is no apparent correlation between turbine emissions and ambient temperatures, i.e., a change in ambient conditions does not necessarily result in a corresponding change in NOX emissions, measured in ppmvd, (see attached graph showing ambient temperature, MW and corrected NOX emissions).
- 4) The turbine manufacturer used a lower heating value (LHV) of 923 / scf in developing the curve referenced above. The fuel gas currently being consumed at the plant has a LHV of 942 / scf which is approximately 2% above design. The control scheme utilized by the manufacturer calculates a reference firing temperature based upon compressor inlet temperature (ambient), fuel gas flow (not energy) and exhaust temperature. Since the exhaust temperature is only one of the three (3) variable which would be directly affected by a higher LHV of the fuel, despite higher energy inputs the control system does not back down the combustion turbine heat consumption in, a direct, linear fashion.
- 5) The data from the CEMS is fed to the Distribution Control System (DCS) for data acquisition and reporting. Tiger Bay will implement changes at the DCS such that emissions are recorded on lbs / hr basis in addition to ppmvd (@ 15% O<sub>2</sub>).
- 6) Permit levels tied to theoretical design data does not allow any room for unit efficiency degradation or normal fluctuation in pipeline quality gas.

Thank you very much for your time and expeditious consideration into this matter. If you should have any questions or require any further information please do not hesitate to contact me at (941) 285-1200 or Ms. Jeanne Benedetti, Senior Environmental Engineer at (713) 735-4568.

Very truly yours,



Jeffrey J. Fassett  
Senior Plant Engineer

CC: SWD  
EPA  
NPS

cc: Jeanne Bennedette / Destec  
Tom Ellison / FDEP



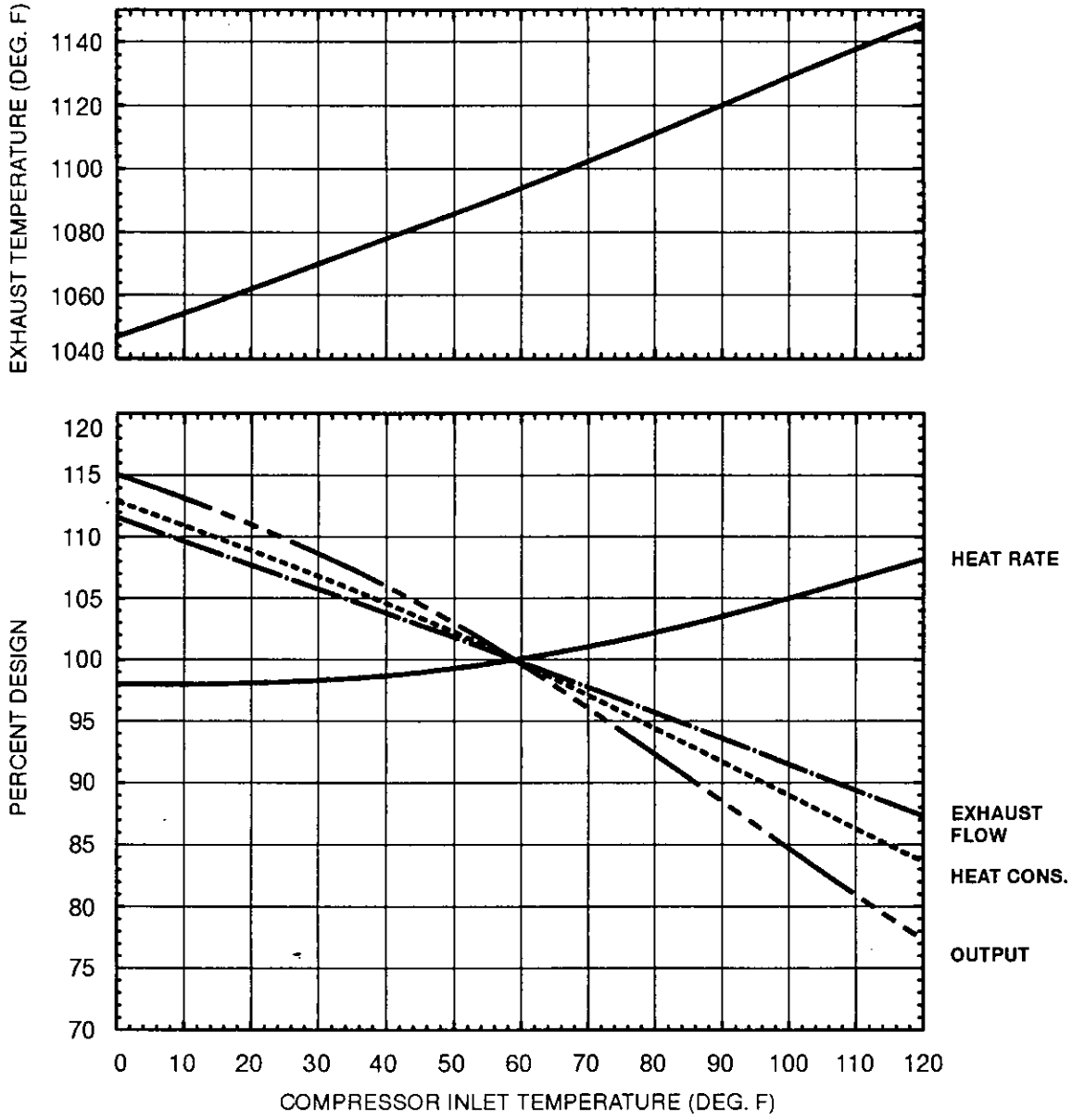
**Table 3-2. Emissions Test Results - Tiger Bay Cogeneration Facility**  
**Gas Firing - Base Load Condition**  
**Date: 24 October, 1995**

Parameter	Units	Run #1	Run #2	Run #3	Average	Permit Emissions Limit
<b>Operating Parameters:</b>						
Load:	MW	143.80	143.80	143.80	143.80	
Fuel Flow:	MSCFH	1513.83	1513.83	1513.83	1513.83	
Volumetric Flow Rate	dscfm	664953	721375	719299	701876	
<b>Ambient Data:</b>						
Ambient Temperature	degrees F	83.6	84.8	83.9	84.1	
Wet Bulb Temperature:	degrees F	75.8	74.3	68.3	72.8	
Barometric Pressure:	"Hg	30.03	30.05	30.02	30.03	
Specific Humidity (Hobs):	# H2O/# DA	0.01630	0.01530	0.01090	0.01417	
<b>Emissions Data:</b>						
Oxygen:	%V, dry	13.9	13.8	13.8	13.8	
Nitrogen Oxides:	ppmV, dry	21.6	22.3	22.4	22.1	
	lb/MMBtu	0.06707	0.06827	0.06857	0.06797	
	ppmV@15% O2	18.2	18.5	18.6	18.5	
	ppmV@15% O2 & ISO Conditions	20.5	20.4	18.9	19.9	25 ppmV
	lb/hr (c)	102.9	115.2	115.4	111.2	161.9 lb/hr
Carbon Monoxide:	ppmV, dry	0.9	0.8	0.8	0.8	15 ppmvd
	lb/MMBtu	0.00170	0.00149	0.00149	0.00156	
	ppmV@15% O2	0.8	0.7	0.7	0.7	
	lb/hr (c)	2.6	2.5	2.5	2.5	48.8 lb/hr
VOCs	ppmV as Propane	0.0	0.0	0.0	0.0	
	lb/hr	0.0	0.0	0.0	0.0	2.8 lb/hr
Visible Emissions (Average)	% Opacity	0	NA	NA	0	
	(Highest 6-min. avg. % Opacity)	0	NA	NA	0	

# General Electric Model PG7221(FA) Gas Turbine

Effect of Compressor Inlet Temperature on  
Output, Heat Rate, Heat Consumption, Exhaust Flow  
And Exhaust Temperature at 100% Speed

FUEL: NATURAL GAS & DISTILLATE OIL  
DESIGN VALUES ON CURVE 517HA303



DATE 4/18/91  
FJ BROOKS

517HA304

Environmental Science & Engineering, Inc.  
 Continuous Emissions Monitoring Data  
 Performed for: Destec Engineering, Inc.  
 Tiger Bay Cogen; Ft. Meade, FL

Table 3-5. EMISSIONS TEST RESULTS AT 150 MW LOAD POINT

PARAMETER	UNITS	RUN 1	RUN 2	RUN 3	AVERAGE
Turbine conditions					
Load	MW	151.0	150.0	146.0	149.0
Fuel flow rate	lb/sec	18.92	18.92	18.92	18.92
Gross Calorific Value	Btu/lb	23221	23221	23221	23221.0
Heat input rate (Gross)	MMBtu/hr	1581.4	1581.4	1581.4	1581.4
Pobs (Compressor Discharge)	psig	201.3	199.8	197.1	199.4
Pref (Compressor Discharge)	psig	195.3	195.3	193.3	194.6
Ambient conditions					
Barometric Pressure	in Hg	29.96	29.96	29.84	29.92
Ambient temperature	deg F	70.2	74.5	81.0	75.2
Wet bulb temperature	deg F	68.0	69.1	70.9	69.3
Specific humidity	lb H <sub>2</sub> O/lb. dry air	0.01382	0.01363	0.01358	0.01367
Test results					
Stack flow rate (1)	ACFM	1030300	1030300	1030300	1030300
Stack flow rate (1)	DSCFM	718633	718633	718633	718633
Oxygen	%V	13.85	13.80	13.85	13.83
NOx	ppmV	18.6	19.1	19.7	19.1
	ppmV @ 15% O <sub>2</sub>	15.6	15.9	16.4	16.0
	ppmV @ ISO	17.2	17.2	17.6	17.3
	lb / hr	95.9	98.3	101.3	98.5
CO	ppmV	1.1	1.0	0.8	1.0
	ppmV@ 15% O <sub>2</sub>	1.0	0.8	0.7	0.8
	lb / hr	3.6	3.0	2.4	3.0
VOC	ppmV as C <sub>3</sub> H <sub>8</sub>	0.0	0.0	0.0	0.0
	lb/hr as C <sub>3</sub> H <sub>8</sub>	0.0	0.0	0.0	0.0
Particulate Matter	gr/dscf	.000321	0.00021	0.00058	0.00133
	lb/hr	19.99	1.26	3.63	8.29
Notes: (1) Average of three measurements made during particulate matter tests					

DATA

PROCESS

Historical Trend Display

18-Jan-1996

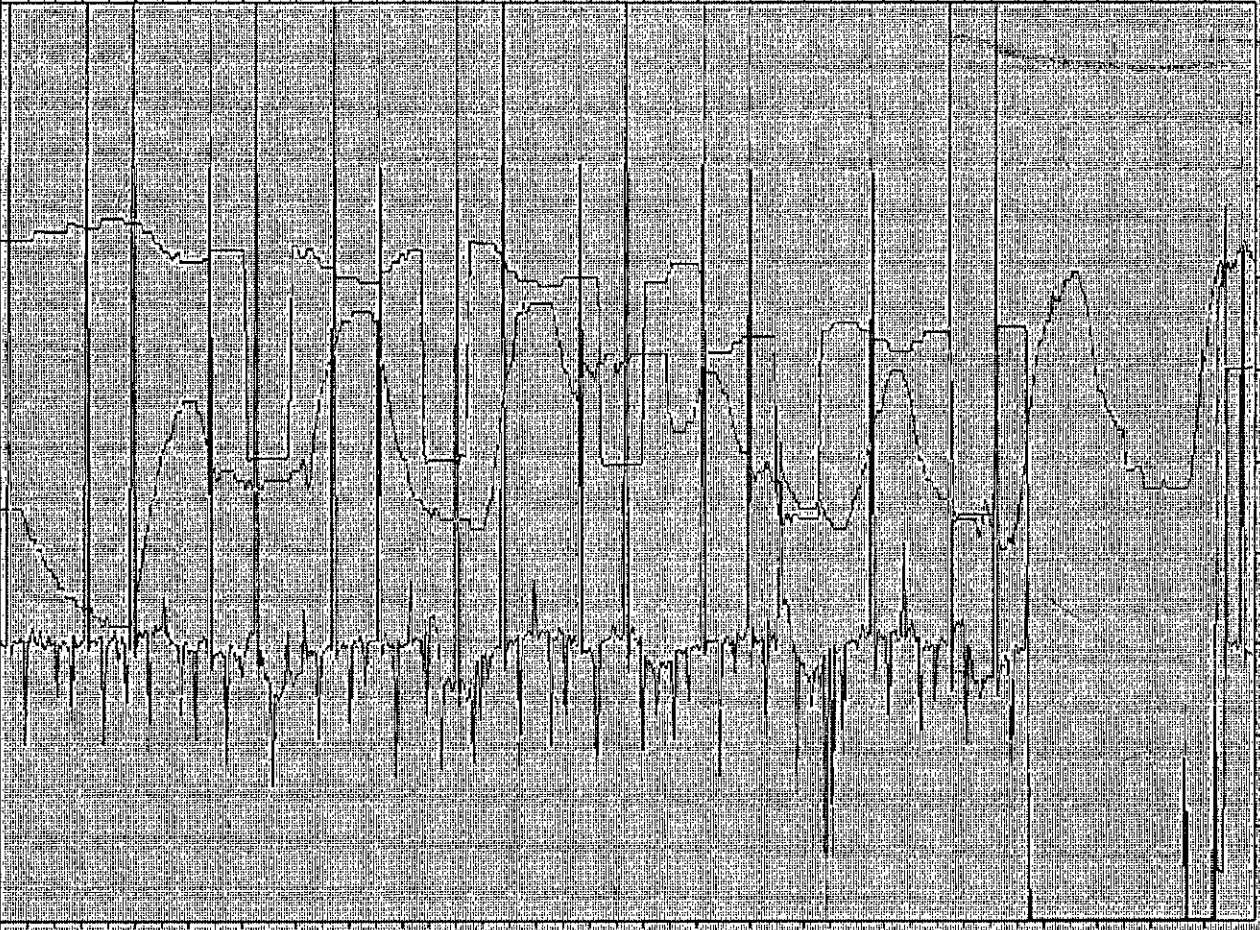
10:45:36

drop211

Select  About Modify... Groups... Create new... Tabular Page Zoom

Start Time : 08-Jan-96 14:00:18 EST End Time : 15-Jan-96 16:20:17 EST Period: 00:17:02

A I101550	AMBIENT TEMPERATURE	DEC F	ACTUAL VAL
A I111525B	CEMS-NON AYLZR CORRECTED	PPM	ACTUAL VAL
A IY07761	GTG MW OUTPUT	MW	ACTUAL VAL



100.00  
55.00  
250.00

0.00  
0.00  
0.00

Data retrieval has completed



# FAX TRANSMISSION

**DESTEC OPERATING COMPANY**

**TIGER BAY COGEN**

3219 State Road 630 West

Fort Meade, Florida 33841

941-285-1200

Fax: 941-285-1206

To: *Jessica Heron*

Date: *01-25-96*

Fax #: *904-922-6979*

Pages: *2* , including this cover sheet.

From: *Jeff Sasset*

Subject: *Tiger Bay Quality Air Permit*

**COMMENTS:**

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**Confidentiality Notice**

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TIGER BAY COGEN  
3219 STATE RD., 630 WEST  
FORT MEADE, FL 33841  
(813) 285-1200 FAX (813) 285-1206

January 24, 1996

Mr. Al Linero  
Florida Department of Environmental Protection  
Air Resource Management  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

**RE: Tiger Bay Limited Partnership  
Permit Number: AC53-214903  
Facility ID: AIRS-1050223**

Dear Mr. Linero,

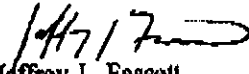
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Again, thank you very much for your time. It was a pleasure meeting you. If you should have any questions or require further information please do not hesitate to contact me at (941) 285-1200 or Ms. Jeanne Benedetti, Senior Environmental Engineer at (713) 735-4568.

Very truly yours,

  
Jeffrey J. Fassett  
Senior Plant Engineer

JJF:ma

cc: Jeanne Benedetti / Destec  
F39.2.6

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

**3. Article Addressed to:**

Ms. Jeanne L. Benedetti  
 Senior Environmental Engineer  
 Destec Energy, Inc.  
 Post Office Box 4411  
 2500 Citywest Boulevard, Suite 150  
 Houston, Texas 77210-4411

**4a. Article Number**

Z 127 632 571

**4b. Service Type**

- Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

**7. Date of Delivery**

NOV 20 1995

**5. Signature (Addressee)**

**6. Signature (Agent)**

*C. Mack*

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

PS Form 3811, December 1991

U.S. GPO: 1993-352-714

**DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 127 632 571



**Receipt for Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Mail to: Ms. Jeanne L. Benedetti  
 Senior Environmental Engineer  
 Destec Energy, Inc.  
 Post Office Box 4411  
 2500 Citywest Boulevard, Suite 150  
 Houston Texas 77210-4411

Certified Fee	
Special Delivery Fee	
Restricted-Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$

Postmark or Date

11-15-95 Return Check  
kkw

PS Form 3800, March 1993



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 15, 1995

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Ms. Jeanne L. Benedetti  
Senior Environmental Engineer  
Destec Energy, Inc.  
Post Office Box 4411  
2500 Citywest Boulevard, Suite 150  
Houston, Texas 77210-4411

Dear Ms. Benedetti:

Re: Extension of Permit No AC53-214903, PSD-FL-190

In accordance with the amendment, which was approved by the Department in October, 1995, the permit referenced above is automatically extended through the later of November 1, 1996 or 240 days after commencing operation. Further details of the conditions of this extension are contained in the amendment, which was sent to your office recently.

Also enclosed is your check for \$50 is hereby refunded since no action was required of the Department.

If you should require further information in response to your request, please call me at (904)488-1344.

Sincerely,

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

AAL/kw

enclosure





RECEIVED

OCT 16 1995

BUREAU OF  
AIR REGULATION

DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
PO BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

October 11, 1995

Mr. A. A. Linero  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RE: *Tiger Bay Limited Partnership  
Request for Extension of Construction Permit No. AC53-214903 & PSD-FL-190***

Dear Mr. Linero:

Tiger Bay Limited Partnership respectfully requests an extension of the Construction Permit referenced above for an additional one year period from the current expiration date of January 1, 1996. Tiger Bay Limited Partnership requests such extension because of the delays in Florida's current Title V permit application program. This request is being provided prior to 60 days before the expiration date of the permit in accordance with F.A.C. Rule 17-4.090.

Pursuant to your letter dated September 6, 1995 to Mr. Robert Chatham, enclosed you will find the \$50.00 processing fee for the extension of said Permit to December 31, 1996.

In addition, the financial institutions have requested confirmation that Tiger Bay Limited Partnership will continue to have the ability to reinstall the duct burner unit upon issuance of an extension. If you could provide confirmation of this, it would be greatly appreciated.

I thank you for your time in reviewing this matter. If upon review you have any questions or require any further information, please do not hesitate to contact me at (713) 735-4568 or Mr. Robert Chatham at (713) 735-4087.

Very truly yours,

Jeanne L. Benedetti  
Senior Environmental Engineer

Enclosure

JLB:mjf

cc: Robert Chatham  
Teresa Heron, FDEP - Tallahassee  
Robert Soich, FDEP - Tampa



RECEIVED

OCT 16 1995

BUREAU OF  
AIR REGULATION

DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

October 11, 1995

Mr. A. A. Linero  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RE: *Tiger Bay Limited Partnership***  
***Request for Extension of Construction Permit No. AC53-214903 & PSD-FL-190***

Dear Mr. Linero:

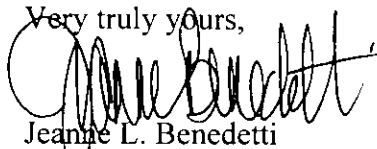
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In addition, the financial institutions have requested confirmation that Tiger Bay Limited Partnership will continue to have the ability to reinstall the duct burner unit upon issuance of an extension. If you could provide confirmation of this, it would be greatly appreciated.

I thank you for your time in reviewing this matter. If upon review you have any questions or require any further information, please do not hesitate to contact me at (713) 735-4568 or Mr. Robert Chatham at (713) 735-4087.

Very truly yours,



Jeanne L. Benedetti  
Senior Environmental Engineer

Enclosure

JLB:mjf

cc: Robert Chatham  
Teresa Heron, FDEP - Tallahassee  
Robert Soich, FDEP - Tampa

Destec Energy Inc.  
 P.O. Box 4411  
 Houston, Texas 77210


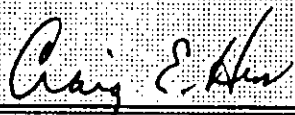
DATE 10/10/95

PAYMENT ADVICE

CHECK NUMBER 144682

INVOICE		COMMENT	GROSS	DEDUCTIONS	AMOUNT PAID
NUMBER	DATE				
100395FE	100395	TIGER BAY - AIR PERMIT EXT	50.00	.00	50.00

DETACH BEFORE DEPOSITING

	CITIBANK Delaware One Penn's Way New Castle, DE 19720	62-20	CHECK NUMBER 00144682
		311	
PAY FIFTY AND 00/100 *****		DATE	AMOUNT
		10/10/95	\$*****50.00
TO THE ORDER OF: 163150 FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FL 32399-2400		Destec Energy Inc. 	

00144682 031100209

38853041

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- 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:  
 Robert S Chatham, PE  
 Sr. Enclid. Engineer  
 Destec Energy, Inc.  
 P.O. Box 44A  
 Houston, TX 77010-4411

4a. Article Number  
Z 127 632 503

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

7. Date of Delivery  
SEP 11 1995

5. Signature (Addressee)

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

6. Signature (Agent) *M.O.L.*

Thank you for using Return Receipt Service

Z 127 632 503

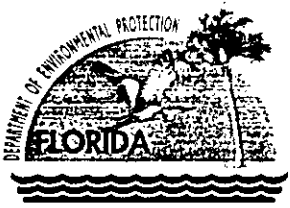


**Receipt for Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Send to	Robert Chatham
Street and No.	Destec Energy
P.O., State and Zip Code	(Tiger Bay) Houston TX
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	9-7-95

PS Form 3800, March 1993



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

September 6, 1995

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Robert S. Chatham, P.E.  
Senior Environmental Engineer  
Destec Energy, Inc.  
P. O. Box 4411  
Houston, Texas 77210-4411

Dear Mr. Chatham:

The Bureau of Air Regulation received your August 2, 1995 request to extend a permit issued to Tiger Bay Limited Partnership. Before we can begin processing your request, we will need a \$50 processing fee for each permit extension. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

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

AAL/pa

cc: John Reynolds



DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

August 25, 1995

Mr. Robert Soich  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**RE: Outage Update for Duct Burner Unit  
Permit No. AC53-214903 and PSD-FL-190  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility**

RECEIVED

SEP 6 1995

Bureau of  
Air Regulation

Dear Mr. Soich:

The purpose of this letter is to update the FDEP on the status of our efforts to have the duct burner unit reinstalled. As you know, the original duct burner had to be removed because of a structural failure. Presently, the unit has not been reinstalled. However, we are working with the vendor and the plant to have the unit reinstalled. Our plan is to complete the reinstallation during the December 1995 or March 1996 outages. The compliance testing should commence within sixty days after the initial firing of the unit.

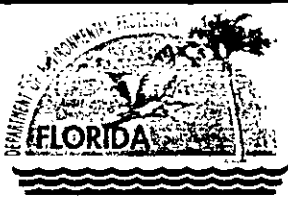
Respectively, the Partnership request FDEP's written concurrence that Tiger Bay is allowed to proceed with the duct burner reinstallation during the December or March outages. Should you have any questions, please feel free to contact me at (713) 735-4087.

Sincerely,

Robert S. Chatham, P.E.  
Senior Environmental Engineer

RSC:mf

cc: Ms. Teresa Heron, FDEP - Tallahassee  
Mr. William Proses, FDEP - Tampa



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

August 10, 1995

Mr. Robert S. Chatham  
Senior Environmental Engineer  
Destec Energy, Incorporated  
2500 Citywest Boulevard, Suite 150  
Post Office Box 4411  
Houston, Texas 77210-4411

Dear Mr. Chatham:


This letter is in response to your request for an extension of permits AC-53-214903 and PSD-F1-190. Please note the attached proposed rule language which will, if adopted, extend the air construction permits by law if the rule is approved. It is anticipated that the rule will be adopted in early September.

Therefore, I propose that you check with Larry George at 904/488-0114 around September to determine the status of the rule.

If the proposed rule, for any reason, is not adopted you will need to request an extension from the Tallahassee office and provide an appropriate fee pursuant to Chapter 62-4, F.A.C., at least sixty days before the permits expire (by the end of October).

Please contact me at 904/488-1344 if you have any questions.

Sincerely,

  
John C. Brown, Jr., P.E.  
Administrator  
Air Permitting and Standards

JCB/sk

cc: ✓ Al Linero  
Bill Thomas, SWD  
Ken Kosky, KBN



August 2, 1995

DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
PO. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

Mr. Al Linero  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
AUG 10 1995

Bureau of  
Air Regulation

**RE: Tiger Bay Limited Partnership  
(Previously Central Florida Power Limited Partnership)  
DEP Permit Number AC53-214903 & PSD-FL-190  
Construction Permit Extension to Accommodate Title V**

Dear Mr. Linero:

Due to the recent extension of time for submitting Title V applications, the above referenced construction permit will expire before the Title V application due date. The Title V permit application for this source will be due in February 1995 while the permit expires on January 1, 1996. This issue was discussed between Ken Kosky of KBN Engineering and Jerry Kissel of the Southwest District. Mr. Kissel indicated that the FDEP policy is to extend the construction permit in these cases. In addition, he indicated that the office issuing the permit needed to extend the permit. As a consequence, since the construction permit was issued in Tallahassee, an extension of the construction permit till July 31, 1996 is requested. An extension till July 31, 1996 will allow for any future delays in the Title V application due dates.

Please call me at (713) 735-4087 if you have any questions.

Sincerely,

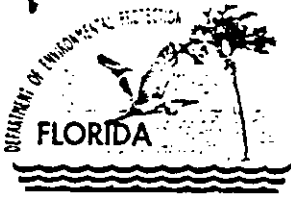
Robert S. Chatham, P.E.  
Senior Environmental Engineer

RSC/sem

cc: FDEP, Mr. Clair Fancy, P.E., Chief  
FDEP, Mr. Bill Thomas, Southwest District Office  
Ken Kosky, KBN

g:\linero





# Department of Environmental Protection

al  
Copy NSRS

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

September 22, 1995

### \*IMPORTANT NOTICE\*

To ~~Whom It May Concern:~~ Robert Chatham

Because of the delay in the U.S. Environmental Protection Agency's (EPA) approval of Florida's request for delegation of the Title V air permitting program, the Division of Air Resources Management began rule making in July to defer the permit application deadlines for all Title V sources. As a matter of non-rule policy, the current Title V permit application deadlines (August 1, 1995, November 15, 1995, and April 2, 1996, depending on source type) have been postponed pending completion of this rule making.

Proposed new application deadlines were published in the Florida Administrative Weekly July 28, 1995; however, alternative new deadlines were recommended by several industry groups. In response, the Division of Air Resources Management has made changes to its July 28 proposal. The new deadlines, which will be formally adopted within the next two weeks, are as follows:

January 1, 1996, for the acid rain part of the applications (where required).

July 1, 1996, if the facility is a Title V source solely by Rule 62-213.200(19)(f)

June 15, 1996, otherwise.

If you have questions, please contact the Division's Title V permitting staff at (904) 488-1344.

Sincerely,

*Al Rhodes*  
Administrator  
New Source Review  
*H. L. Rhodes*  
for Howard L. Rhodes, Director  
Division of Air Resources Management

additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rule 62-213.420(1)(b)3. and 4. F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to

*This means Construction Permits too!*

62-213.420(1)(b)2. (cont'd.) - 62-213.420(1)(b)4.

*62-213.420(1)(a)2*

*This says if you make timely application for Title V permit, you can operate on existing valid Construct or Operate Permit.*

(c) Emissions of all regulated pollutants which the applicant knows or has reason to believe are being emitted from a source even if no emission limitation would apply to the source unless otherwise provided in this subsection. The applicant shall report pollutants for each emissions unit and for source wide emissions such as fugitive emissions. For those pollutants for which no standard test method or published emissions factor is available to the applicant, the applicant shall estimate the emissions and shall include the basis for the estimate with the emissions information. For purposes of this subsection, regulated pollutant means, in addition to the regulated air pollutants specified in Rule 62-213.200, F.A.C., any hazardous air pollutant and any pollutant to which an emissions limitation applies in accordance with Rule 62-213.420(3)(c)1., F.A.C. Except as provided in Chapter 62-297, F.A.C., for submittal of compliance test data, nothing in this section shall be construed to require testing of actual emissions for determining estimated or potential emissions for a permit application. All applicants shall report regulated pollutants as follows:

1. Those Title V sources for which an emission limitation is included in the source's most recent operation permit or in the construction permit shall report and quantify, for each emissions unit subject to the emissions limitation, all emissions of any pollutant to which the limitation applies;

2. Title V sources emitting or with the potential to emit any pollutant described in paragraphs (a) and (c) of the definition of regulated air pollutant in Rule 62-213.200, F.A.C., shall report each such pollutant as follows:

a. Each Title V source emitting or with the potential to emit fifty tons or more per year of carbon monoxide shall report all emissions of carbon monoxide for each emissions unit with the potential to emit ten tons or more per year of the pollutant. Fugitive carbon monoxide emissions and emissions from units with the potential to emit less than ten tons per year shall be considered as source-wide emissions and shall be reported as source-wide emissions if, in the aggregate, the source-wide emissions equal or exceed ten tons per year;

b. Each Title V source emitting or with the potential to emit five hundred pounds or more per year of lead and lead compounds, expressed as lead, shall report all emissions of lead and lead compounds, expressed as lead, for each emissions unit with the potential to emit one hundred pounds or more per year of lead and lead compounds, expressed as lead. Fugitive emissions of lead and lead compounds, expressed as lead, and emissions from units with

62-213.420(3)(c) - 62-213.420(3)(c)2.b.

PROPOSED LANGUAGE - In mean time we  
will process extension  
request. al.

62-213.420 Permit Applications

(1) (a) 1. For sources that have commenced operation by ~~January 1, 1996~~ ~~January 2, 1995~~, a timely application under this chapter is one that is submitted as follows:

2. Except for sources that are subject to the Florida Electrical Power Plant Siting Act (FEPPSA), a source that commences operation after ~~January 1, 1996~~ ~~January 2, 1995~~, must file an application for an operation permit under this chapter ninety days before expiration of the source's construction permit, but no later than 180 days after commencing operation. A source that has applied for an Electrical Power Plant Siting Certification prior to ~~January 1, 1996~~ ~~January 2, 1995~~, but has not commenced operation by that date, shall file an application for an operation permit under this Chapter no later than 180 days after commencing operation. Sources subject to the FEPPSA that apply for Electrical Power Plant Siting Certification subsequent to ~~January 1, 1996~~ ~~January 2, 1995~~, shall apply for a permit under the provisions of this chapter at the same time the Florida Power Plant Siting Certification application is submitted.

4. The expiration dates of all air construction permits for Title V sources that expire between September 1, 1995, and September 1, 1996, are hereby extended to September 1, 1996.

Specific Authority: 403.061, 403.087, F.S.

Law Implemented: 403.061, 403.0872, F.S.

History: New 11-28-93; Amended 4-62-94; Formerly 17-213.420;

Amended 11-23-94, 4-2-95, \_\_\_\_\_.





TO: J. REYNOLDS

August 2, 1995

DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

Mr. Al Linero  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

*(also copy attached)*  
*Per telecon of Reynolds/G Kissel*  
*8/14/95, Tall's will process.*  
*I told R. Chatham\* that*  
*DEP would contact him if*  
*fee required.*  
*- JK 8/14/95*

**RE: Tiger Bay Limited Partnership  
(Previously Central Florida Power Limited Partnership)  
DEP Permit Number AC53-214903 & PSD-FL-190  
Construction Permit Extension to Accommodate Title V**

Dear Mr. Linero:

*\* he mentioned that they have*  
*another permit, for a spray dryer,*  
*in the same*  
*situation*

Due to the recent extension of time for submitting Title V applications, the above referenced construction permit will expire before the Title V application due date. The Title V permit application for this source will be due in February 1995 while the permit expires on January 1, 1996. This issue was discussed between Ken Kosky of KBN Engineering and Jerry Kissel of the Southwest District. Mr. Kissel indicated that the FDEP policy is to extend the construction permit in these cases. In addition, he indicated that the office issuing the permit needed to extend the permit. As a consequence, since the construction permit was issued in Tallahassee, an extension of the construction permit till July 31, 1996 is requested. An extension till July 31, 1996 will allow for any future delays in the Title V application due dates.

Please call me at (713) 735-4087 if you have any questions.

Sincerely,

*Robert S. Chatham*

Robert S. Chatham, P.E.  
Senior Environmental Engineer Department of Environmental Protection  
SOUTHWEST DISTRICT

**RECEIVED**  
AUG 04 1995

BY \_\_\_\_\_

RSC/sem

cc: FDEP, Mr. Clair Fancy, P.E., Chief  
FDEP, Mr. Bill Thomas, Southwest District Office  
Ken Kosky, KBN

g:\linero





RECEIVED

JAN 27 1995

January 23, 1994

Bureau of  
Air Regulation

DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

[CORRECTED]

State of Florida  
Department of Environmental Regulation  
Division of Air Resources Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399

**RE: Start of Commercial Operations  
Permit Nos. PSD-F1-190, AC53-214903 and AC53-230744  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility**

To Whom It May Concern:

On behalf of Tiger Bay Limited Partnership (TBLP), we are pleased to announce that on January 1, 1995, TBLP commenced commercial operations.

Should you have any questions, please feel free to contact me at (713) 735-4087.

Sincerely,

Robert S. Chatham, P.E.  
Senior Environmental Engineer

RSC:gmc

cc: M. M. Davenport

*J. Heron  
B. Thomas, SW Dist.  
by Hansen, EPA*



*File*

January 18, 1995

DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
PO BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

Mr. Robert Soich  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RECEIVED

JAN 24 1995

Bureau of  
Air Regulation

**RE: Outage Update for Duct Burner Unit  
Permit No. AC53-214903 and PSD-FL-190  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility**

Dear Mr. Soich:

Presently, the Tiger Bay cogeneration facility has planned the following outages:

First Outage: March 4 to March 17, 1995  
Second Outage: April 8 to April 21, 1995

The plant expects to perform the engineering tests for the duct burner unit between March 17 and April 8, 1995. The compliance testing is expected to commence after the April outage.

Should you have any questions, please feel free to contact me at (713) 735-4087.

Sincerely,



Robert S. Chatham, P.E.  
Senior Environmental Engineer

RSC:gmc

cc: M. M. Davenport  
Ms. Teresa Heron, FDEP - Tallahassee  
Mr. William Proses, FDEP - Tampa

DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
PO. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

RECEIVED  
DEC 27 1994

Bureau of  
Air Regulation

December 20, 1994

Mr. Robert Soich  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**RE: 90 Day Extension for Duct Burner Unit  
Permit No. AC53-214903 and PSD-FL-190  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility**

Dear Mr. Soich:

On behalf of Tiger Bay Limited Partnership (TBLP), we are requesting a 90 day extension for the duct burner unit's initial source test. Presently, TBLP is experiencing duct burner problems which will require an outage to make the necessary modifications or repairs. At this time, the outage schedule has not been finalized but the repairs are expected to be completed during the month of March 1995. During the time between now and the March outage, TBLP plans to not fire the duct burner unit until the modifications or repairs have been completed. The maximum firing date for the duct burner unit was October 31, 1994.

Should you have any questions, please feel free to contact me at (713) 735-4087.

Sincerely,



Robert S. Chatham, P.E.  
Senior Environmental Engineer

RSC:gmc

cc: M. M. Davenport  
Ms. Teresa Heron, FDEP - Tallahassee  
Mr. William Proses, FDEP - Tampa



DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

December 14, 1994

RECEIVED  
DEC 19 1994  
Bureau of  
Air Regulation

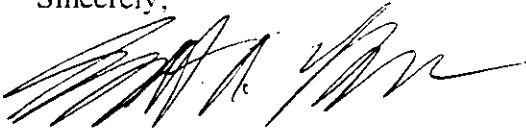
Mr. Robert Soich  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33616

Dear Mr. Soich:

Enclosed is a copy of the source test report submitted on behalf of Tiger Bay Cogeneration Facility, Permit No: AC53-214903/PSD-FL-190. The report was prepared by Environmental Science and Engineering, Inc. for testing conducted on the gas turbine between October 19 and 23, 1994. Source testing for the duct burner has not been completed at this time.

If you have any questions, please contact Robert Chatham at 713/735-4087.

Sincerely,



Scott A. Kicker  
Environmental Engineer

Enclosure

cc: Ms. Teresa Heron (FDER Tallahassee)  
Mr. William Proses (FDEP Tampa)

**Is your RETURN ADDRESS completed on the reverse side?**

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
Mr. Robert S. Chatham  
Senior Environmental Manager  
Destec Energy, Inc.  
Post Office Box 4411  
Houston, Texas 77210-4411

4a. Article Number  
Z 751 860 005

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

7. Date of Delivery  
DEC - 9/1994

5. Signature (Addressee)

6. Signature (Agent)  
CORTIS NICKERSON

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

PS Form 3811, December 1991    ★U.S. GPO: 1992-323-402    **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 751 860 005

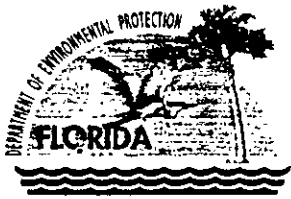


**Receipt for Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, March 1993

Sent to Mr. Robert S. Chatham	
Street and No. Post Office Box 4411	
P.O., State and ZIP Code Houston, Texas 77210-4411	
Postage	\$
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TOTAL Postage & Fees	\$
Postmark or Date Mailed: 12/06/94 AC 53-214903 [PSD-FL-190(A)]	



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 2, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert S. Chatham  
Senior Environmental Engineer  
Destec Energy, Inc.  
Post Office Box 4411  
Houston, Texas 77210-4411

RE: Amendment to Construction Permit  
NSPS Custom Fuel Monitoring Schedule  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility  
AC 53-214903 [PSD-FL-190(A)]

Dear Mr. Chatham:

The Department has reviewed your August 3, 1994 request, with supporting data and additional data submitted on September 9 and 22, 1994, for an NSPS Custom Fuel Monitoring Schedule. The schedule would only apply to a monitoring schedule for sulfur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) when natural gas is being fired at the subject facility (refer to Attachment No. 1). The facility is required by the permit to comply with Subpart GG of the New Source Performance Standards (NSPS), 40 CFR 60. For sources utilizing pipeline quality natural gas, 40 CFR 60.334(b) and 40 CFR 60.334(b)(2) state that a custom fuel monitoring schedule, if supported by data which demonstrates compliance with NSPS emission limits, may be approved by the Administrator of EPA. This authority has been delegated to EPA's regional offices and a copy of the subject request was jointly submitted to EPA Region IV for a determination. The Department received a letter from EPA on October 12, 1994, stating that a custom fuel monitoring schedule for this facility was acceptable, if it complied with all items of the attachment to the custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987 (Refer to Attachment No. 2). The results from a minimum of three sampling events for six consecutive months were provided by the permittee, which demonstrated consistent compliance with the allowable sulfur dioxide emissions limits specified under 40 CFR 60.333 and this permit. Therefore, upon issuance of the amended permit, the permittee shall begin monitoring the sulfur content of natural gas as specified in 2.b. of the Custom Fuel Monitoring Schedule for Natural Gas. In accordance with the EPA determination, the permit Specific Conditions will be amended as follows:

I. Specific Condition Number:

18. From

Sulfur and nitrogen content and lower heating value of the fuel being fired in the combustion turbines shall be determined as specified in 40 CFR 60.334(b). Any request for a future custom monitoring schedule shall be made in writing and directed to the Southwest District office. Any custom schedule approved by DEP pursuant to 40 CFR 60.334(b) will be recognized as enforceable provisions of the permit, provided that the holder of this permit demonstrates that the provisions of the schedule will be adequate to assure continuous compliance. The records of distillate fuel oil usage shall be kept by the company for a two-year period for regulatory agency inspection purposes. For sulfur dioxide, periods of excess emissions shall be reported if the fuel being fired in the gas turbine exceeds 0.05 percent sulfur by weight.

To

This source shall be in compliance with all requirements of 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines), 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), and Rule 62-296.800(2)(a), F.A.C. (Standards of Performance for New Stationary Sources (NSPS)).

A. Natural Gas

Pursuant to 40 CFR 60.334(b)(2), a custom fuel monitoring schedule shall be followed for the natural gas fired at this facility and shall be as follows:

Custom Fuel Monitoring Schedule for Natural Gas (NG)

1. Monitoring of fuel nitrogen content shall not be required when NG is the only fuel being fired in the turbines.
2. Sulfur Monitoring
  - a. Analysis for fuel sulfur content of the NG fired at this facility shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82, as referenced in 40 CFR 60.335(b)(2).

- b. This custom fuel monitoring schedule shall become effective on the date this permit is amended. Effective the date of this custom schedule, sulfur monitoring of NG fired at the facility shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
  - c. If, after the monitoring required in item 2(b) above, or herein, the sulfur content of the NG fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333 and in this permit, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
  - d. Should any sulfur analysis, as required in items 2(b) or 2(c), above, indicate noncompliance with 40 CFR 60.333 or this permit, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
  4. Records of sample analysis and fuel supply pertinent to this custom fuel monitoring schedule for NG shall be retained for a period of five years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

B. Distillate Fuel Oil

The records of distillate fuel oil usage shall be kept by the company for a five-year period for regulatory agency inspection purposes. For sulfur dioxide, periods of excess emissions shall be reported if the distillate fuel oil being fired in the gas turbine exceeds 0.05 percent sulfur content, by weight.

Mr. Robert S. Chatham  
AC 53-214903 [PSD-FL-190(A)]  
December 2, 1994  
Page 4 of 5

II. Attachments to be Incorporated:

- Destec letter received September 12, 1994.
- FDEP letter dated August 18, 1994.
- U.S. EPA letter received October 12, 1994.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the

Mr. Robert S. Chatham  
AC 53-214903 [PSD-FL-190(A)]  
December 2, 1994  
Page 5 of 5

requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

This letter amendment must be attached to Construction Permit, No. AC 53-214903 [PSD-FL-190(A)], and shall become part of the permit.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/cl/b

Attachments

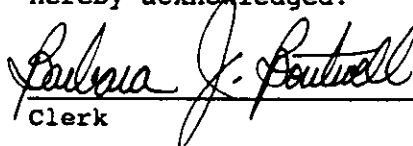
cc: G. Kissel, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
K. Kosky, KBN

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 12/6/94 to the listed persons.


Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is  
hereby acknowledged.

 12/6/94  
Clerk Date

Florida Department of  
**Environmental Protection**

Memorandum

TO: Howard Rhodes  
FROM: Clair Fancy   
DATE: December 2, 1994  
SUBJECT: Approval of Construction Permit Amendment  
NSPS Custom Fuel Monitoring Schedule  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility  
AC 53-214903 [PSD-FL-190(A)]

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Attached for your approval and signature is an amendment to a construction permit prepared by the Bureau of Air Regulation for the Tiger Bay Cogeneration Facility. The purpose of this amendment is to specify a custom fuel monitoring schedule for sulfur dioxide and nitrogen oxides in natural gas used as fuel at this facility. Pursuant to 40 CFR 60.334(b)(2), the request for a custom fuel monitoring schedule, with data which demonstrated consistent compliance with all the conditions of this permit and 40 CFR 60, Subpart GG, was approved by the Administrator of the U.S. EPA. This amendment will not cause an increase in annual permit allowable emission limits, annual actual emission limits, or result in any equipment change. There is no controversy associated with this action.

This amendment is recommended for your approval and signature.

CF/CSL

Attachment





D.E.R.

DESTEC ENERGY, INC.  
34759 LENCIONI AVENUE  
SUITE A  
BAKERSFIELD, CA 93308  
(805) 392-7301 • FAX (805) 393-5143

OCT 14 1994

SOUTHWEST DISTRICT  
TAMPA

October 12, 1994

William A. Proses  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

RE: CEMS Certification and Source Testing  
Permit No: AC53-214903 and PSD-FL-190  
AC53-230744  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility

Dear Mr. Proses:

Enclosed is a copy of the preliminary results of the spray dryer visible emissions test conducted on September 27, 1994, Permit No: AC53-230744. The test was conducted with the spray dryer unit operating at a maximum spray dryer heat input of 2,311 SCFH for ambient operating conditions. A final report of the visible emissions test with a Certificate of Completion will be submitted to your office on or before November 11, 1994.

If you have any questions regarding these issues, please call me at 805/392-7347.

Sincerely,

Scott A. Kicker  
Environmental Engineer

cc: Teresa Heron, FDEP-Tallahassee  
Bob Soich, FDEP-Tampa



**bcc:** Vern Staub  
J.D. Sellers  
Robert Chatham  
**File:** (Tiger Bay) 1253



Environmental  
Science &  
Engineering, Inc.

Sept. 29, 1994

Mr. Scott Kicker  
DESTEC Energy  
34759 Lencioni Avenue  
Bakersfield, CA 93308

Dear Mr. Kicker:

On Sept. 27, 1994 ESE performed a visual emissions test at your Tiger Bay Cogen Facility at Ft. Meade, FL. The visual test measured the opacity of your spray dryer baghouse. The emissions for the one hour period was all zero opacity.

If we can be of further service, or if you desire further information please feel free to call.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Norman R. Czarniak

dsg\jeffer2.nrc

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9 200A 2008 Other \_\_\_\_\_

Company Name  
**DESTEC Energy**

Facility Name  
**TIGER BAY COGEN**

Street Address  
 \_\_\_\_\_

City **FT. MEADE** State **FL** Zip \_\_\_\_\_

Process **SPRAY DRYER** Unit # \_\_\_\_\_ Operating Mode **100%**

Control Equipment **BAG HOUSE** Operating Mode **100%**

Describe Emission Point  
**CIRCULAR STEEL STACK GRAY**  
**1.4' dia**

Height of Emiss. Pt.  
 Start **73.5'** End  Height of Emiss. Pt. Rel. to Observer  
 Start **4'** End **4'**

Distance to Emiss. Pt.  
 Start **25'** End  Direction to Emiss. Pt. (Degrees)  
 Start **348** End **348**

Vertical Angle to Obs. Pt.  
 Start **~17°** End  Direction to Obs. Pt. (Degrees)  
 Start **348/168** End **168**

Distance and Direction to Observation Point from Emission Point  
 Start **25' SSE** End

Describe Emissions  
 Start **Non Visible** End

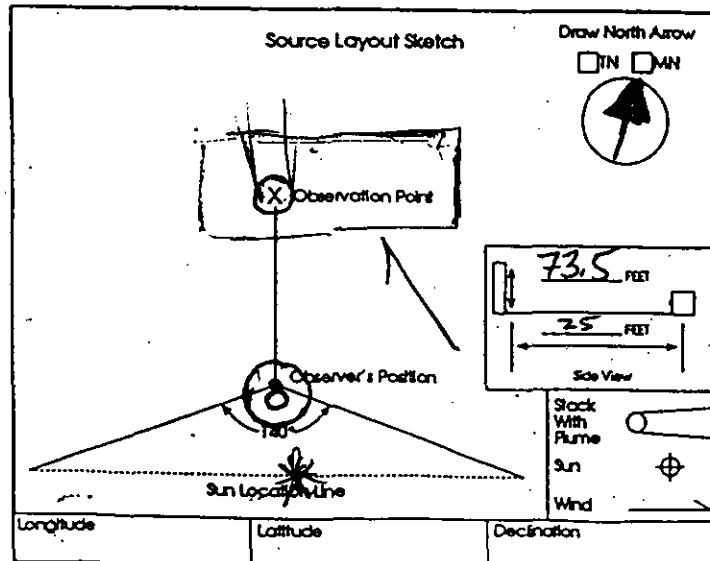
Emission Color  
 Start **Clear** End  Water Droplet Plume  
 Attached  Detached  None

Describe Plume Background  
 Start **Gray Cloud** End

Background Color  
 Start **Gray** End  Sky Conditions

Wind Speed  
 Start **6-8** End **10-12** Wind Direction  
 Start **SE** End

Ambient Temp.  
 Start **78** End **78** Wet Bulb Temp. **75** RH Present **86%**



Additional Information  
 \_\_\_\_\_

Form Number **DC 001** Page **1** of **2**

Continued on VEO Form Number  
**DC 002**

Observation Date **9/27/94** Time Zone **F** Start Time **1124** End Time **1224**

Min	Sec				Comments
	0	15	30	45	
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
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27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print)  
**NORMAN R. CZARNIAK**

Observer's Signature  
*Norman R. Czarniak* Date **9/27/94**

Organization  
**E.S.E**

Certified by  
**EASTERN TECH. ASSOC.** Date **8/24/94**

VISIBLE EMISSION OBSERVATION FORM 1

Form Number DC002 Page 2 of 2  
 Continued on VEO Form Number

Method Used (Circle One)  
 Method 9      203A      2038      Other: \_\_\_\_\_

Company Name \_\_\_\_\_  
 Facility Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

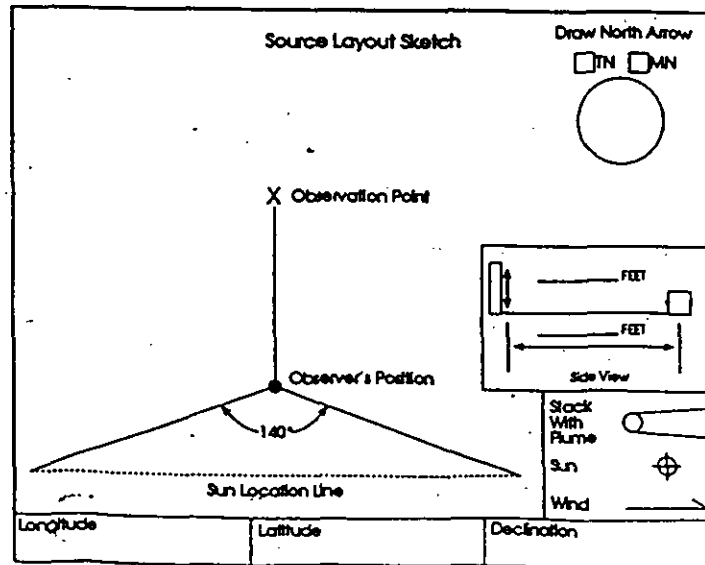
Process \_\_\_\_\_ Unit # \_\_\_\_\_ Operating Mode \_\_\_\_\_  
 Control Equipment \_\_\_\_\_ Operating Mode \_\_\_\_\_

Describe Emission Point  
1.5' dia  
 Height of Emiss. Pt. \_\_\_\_\_ Height of Emiss. Pt. Rel. to Observer \_\_\_\_\_  
 Start 73.5 End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance to Emiss. Pt. \_\_\_\_\_ Direction to Emiss. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_

Vertical Angle to Obs. Pt. \_\_\_\_\_ Direction to Obs. Pt. (Degrees) \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance and Direction to Observation Point from Emission Point  
 Start \_\_\_\_\_ End \_\_\_\_\_

Describe Emissions  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Emission Color \_\_\_\_\_ Water Droplet Plume \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Attached  Detached  None

Describe Plume Background  
 Start \_\_\_\_\_ End \_\_\_\_\_  
 Background Color \_\_\_\_\_ Sky Conditions \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Wind Speed \_\_\_\_\_ Wind Direction \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_  
 Ambient Temp. \_\_\_\_\_ Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_  
 Start \_\_\_\_\_ End \_\_\_\_\_ Start \_\_\_\_\_ End \_\_\_\_\_



Additional Information \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Sec Min	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
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2	0	0	0	0			
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26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print) \_\_\_\_\_  
 Observer's Signature \_\_\_\_\_ Date \_\_\_\_\_  
 Organization \_\_\_\_\_  
 Certified By \_\_\_\_\_ Date \_\_\_\_\_

VISIBLE EMISSION OBSERVATION FORM 1

Method used (Circle One)  
 Method 9 200A 200B Other \_\_\_\_\_

Company Name  
**DESTEC Energy**

Facility Name  
**TIGER BAY COGEN**

Street Address \_\_\_\_\_

City **FT. MEADE** State **FL** Zip \_\_\_\_\_

Process  
**SPRAY DRYER** Unit # \_\_\_\_\_ Operating Mode **100%**

Control Equipment  
**BAG HOUSE** Operating Mode **100%**

Describe Emission Point  
**CIRCULAR STEEL STACK GRAY**  
**1.4' dia**

Height of Emis. Pt.  
 Start **73.5'** End  Height of Emis. Pt. Rel. to Observer  
 Start **4'** End **4'**

Distance to Emis. Pt.  
 Start **25'** End  Direction to Emis. Pt. (Degrees)  
 Start **348** End **348**

Vertical Angle to Obs. Pt.  
 Start **~12°** End  Direction to Obs. Pt. (Degrees)  
 Start **348/168** End **168**

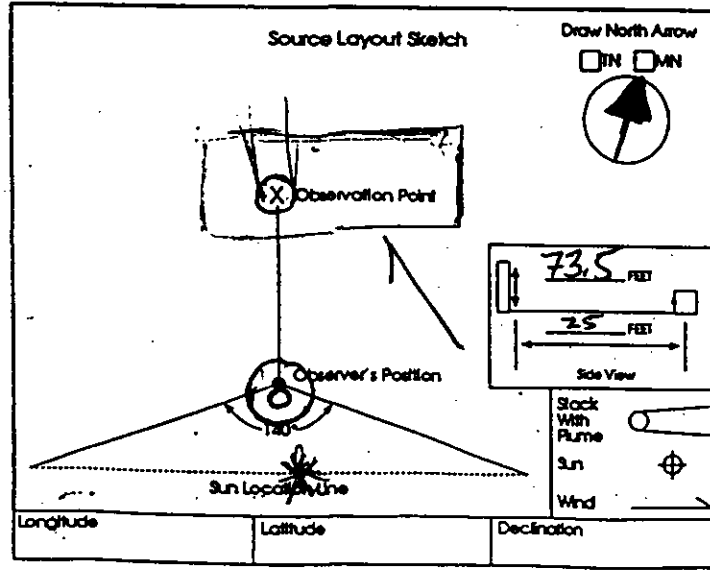
Distance and Direction to Observation Point from Emission Point  
 Start **25' SSE** End

Describe Emissions  
 Start **Non Visible** End   
 Emission Color  
 Start **Clear** End  Water Droplet Plume  
 Attached  Detached  None

Describe Plume Background  
 Start **Gray cloud** End   
 Background Color  
 Start **Gray** End  Sky Conditions

Wind Speed  
 Start **6-8** End **10-12** Wind Direction  
 Start **SE** End

Ambient Temp  
 Start **78** End **78** Wet Bulb Temp. **75** Rel. Humid. **86%**



Additional Information \_\_\_\_\_

Form Number **DC001** Page **1** of **2**  
 Continued on VEO Form Number **DC002**

Min	Time				Comments
	sec	15	30	45	
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28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print)  
**NORMAN R. CZARNIAK**

Observer's Signature  
**Norman R. Czarniak** Date **9/27/94**

Organization  
**E.S.E**

Certified by  
**EASTERN TECH. ASSOC.** Date **8/24/94**

# VISIBLE EMISSION OBSERVATION FORM 1

Form Number DC002 Page 2 of 2  
 Continued on VEO Form Number

Method Used (Circle One)  
 Method 9    203A    203B    Other \_\_\_\_\_

Company Name \_\_\_\_\_  
 Facility Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

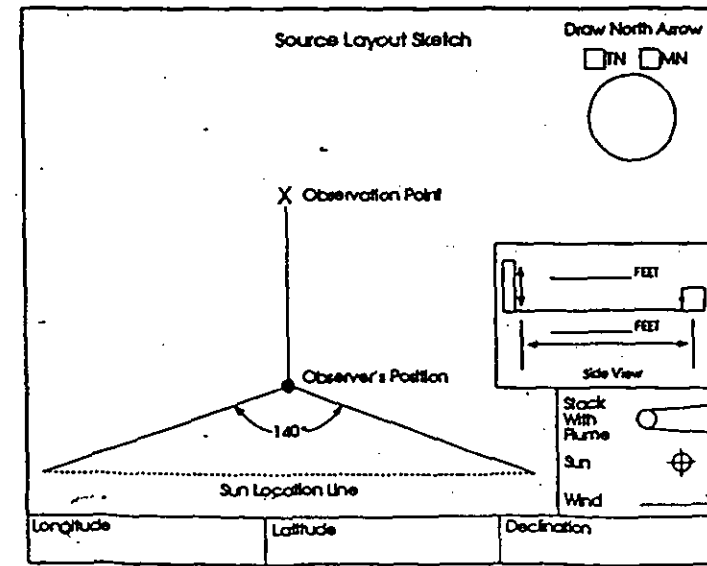
Process \_\_\_\_\_ Unit # \_\_\_\_\_ Operating Mode \_\_\_\_\_  
 Control Equipment \_\_\_\_\_ Operating Mode \_\_\_\_\_

Describe Emission Point  
1.5' dia  
 Height of Emiss. Pt. Start 75.5 End \_\_\_\_\_ Height of Emiss. Pt. Rel. to Observer Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance to Emiss. Pt. Start \_\_\_\_\_ End \_\_\_\_\_ Direction to Emiss. Pt. (Degrees) Start \_\_\_\_\_ End \_\_\_\_\_

Vertical Angle to Obs. Pt. Start \_\_\_\_\_ End \_\_\_\_\_ Direction to Obs. Pt. (Degrees) Start \_\_\_\_\_ End \_\_\_\_\_  
 Distance and Direction to Observation Point from Emission Point Start \_\_\_\_\_ End \_\_\_\_\_

Describe Emissions  
 Start \_\_\_\_\_ End \_\_\_\_\_ Emission Color \_\_\_\_\_ Water Droplet Plume Attached  Detached  None   
 Start \_\_\_\_\_ End \_\_\_\_\_

Describe Plume Background  
 Start \_\_\_\_\_ End \_\_\_\_\_ Background Color \_\_\_\_\_ Sky Conditions Start \_\_\_\_\_ End \_\_\_\_\_  
 Wind Speed Start \_\_\_\_\_ End \_\_\_\_\_ Wind Direction Start \_\_\_\_\_ End \_\_\_\_\_  
 Ambient Temp. Start \_\_\_\_\_ End \_\_\_\_\_ Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_



Additional Information \_\_\_\_\_

Sec Min	Time Zone				Start Time	End Time	Comments
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2	0	0	0	0			
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29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print) \_\_\_\_\_  
 Observer's Signature \_\_\_\_\_ Date \_\_\_\_\_  
 Organization \_\_\_\_\_  
 Certified by \_\_\_\_\_ Date \_\_\_\_\_



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

OCT 06 1994

RECEIVED  
OCT 12 1994  
Bureau of  
Air Regulation

4APT-AEB

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

SUBJ: Approval of NSPS Custom Fuel Monitoring Schedule for  
Tiger Bay Limited Partnership, Gas Turbine Cogeneration  
Facility, Permit Nos. AC53-214903 and PSD-FL-190

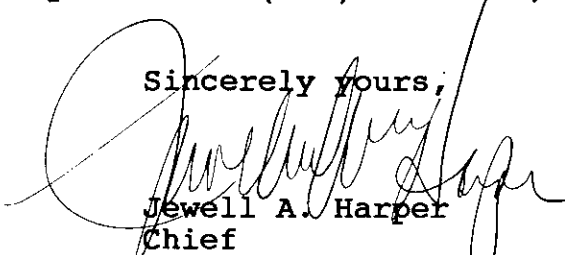
Dear Mr. Fancy:

This is to acknowledge a letter from Mr. Robert S. Chatham of Destec Energy (DE) dated August 3, 1994, requesting approval of a customized fuel monitoring schedule for the above referenced project. This letter was jointly transmitted to the U.S. Environmental Protection Agency (EPA), and to you.

Since the authority for approving a custom fuel monitoring plan under 40 CFR Part 60, Subpart GG has not been delegated to the State of Florida, we have reviewed DE's custom fuel monitoring schedule including the additional information submitted on September 22, 1994. Based on our review, we have determined that the proposed schedule is acceptable, as long as this source complies with all items of the attachment to the custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987. A copy of this memo was included with DE's request as an enclosure.

If you have any questions regarding this letter, please contact Mr. Mirza P. Baig of my staff at (404) 347-3555, voice mail extension 4147.

Sincerely yours,

  
Jewell A. Harper  
Chief

Air Enforcement Branch  
Air, Pesticides, & Toxics  
Management Division



September 26, 1994

William A. Proses  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RE: CEMS Certification and Source Testing  
Permit No: AC53-214903 and PSD-FL-190  
AC53-230744  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility

Dear Mr. Proses:

CEMS Certification and Source Testing was originally scheduled at Tiger Bay Limited (Permit No: AC53-2414903 and PSD-FL-190) for September 19 through September 25. Since the duct burner for the facility is not currently in service, CEMS Certification and Source Testing has tentatively been scheduled to begin either October 10 or 17. As soon as the duct burner is in service, a firm date will be selected for CEMS Certification and Source Testing.

As we discussed on September 26, the spray dryer unit for Permit No: AC53-230744 is currently in operation. Tiger Bay Limited has scheduled a visible emissions opacity test to be conducted on September 27.

If you have any questions regarding this issue, please call me at 805/392-7347 or 813/285-7137.

Sincerely,



Scott A. Kicker  
Environmental Engineer

cc: Teresa Heron, FDEP-Tallahassee

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

3. [Signature]

1. Teresa Heaton

4. \_\_\_\_\_

2. DARM

5. \_\_\_\_\_

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE \_\_\_\_\_

COMMENTS:

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

RECEIVED

OCT 05 1994

Bureau of  
Air Regulation

FROM: SWD/TPA/AP DATE: 9/29/94 PHONE: 572-6100 413

CLM

DESTEC ENGINEERING, INC.  
2500 CITYWEST BLVD., SUITE 150  
HOUSTON, TEXAS 77042  
POST OFFICE BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

September 26, 1994

William A. Proses  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**RECEIVED**  
OCT 14 1994  
Department of Environmental Protection  
by SOUTHWEST DISTRICT

RE: CEMS Certification and Source Testing  
Permit No: AC53-214903 and PSD-FL-190  
AC53-230744  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility

Dear Mr. Proses:

CEMS Certification and Source Testing was originally scheduled at Tiger Bay Limited (Permit No: AC53-2414903 and PSD-FL-190) for September 19 through September 25. Since the duct burner for the facility is not currently in service, CEMS Certification and Source Testing has tentatively been scheduled to begin either October 10 or 17. As soon as the duct burner is in service, a firm date will be selected for CEMS Certification and Source Testing.

As we discussed on September 26, the spray dryer unit for Permit No: AC53-230744 is currently in operation. Tiger Bay Limited has scheduled a visible emissions opacity test to be conducted on September 27.

If you have any questions regarding this issue, please call me at 805/392-7347 or 813/285-7137.

Sincerely,



Scott A. Kicker  
Environmental Engineer

cc: Teresa Heron, FDEP-Tallahassee

Z 751 859 984

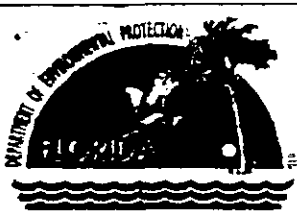


### Receipt for Certified Mail

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to Mr. Robert S. Cradham	
Street and No Destec Energy, Inc.	
P.O., State and ZIP Code P.O. Box 4411 Houston TX	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed 9/23/94 AC 53-214903 P5D-FL-190(A)	

PS Form 3800, March 1993



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

September 22, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert S. Chatham, P.E.  
Senior Environmental Engineer  
Destec Energy, Inc.  
P.O. Box 4411  
Houston, Texas 77210-4411

RE: NSPS Custom Fuel Monitoring Schedule  
Tiger Bay Cogeneration Facility  
Permit Amendment Request  
AC 53-214903 [PSD-FL-190(A)]

Dear Mr. Chatham:

To complete our review of your request, received on September 12, 1994, to amend the construction permit by incorporating a custom fuel monitoring schedule, it was necessary to request additional information. This information was received today and is adequate to complete the amendment request. Your amendment request, which includes the initial submittal and the additional information, is being mailed to the U.S. EPA for their review and determination. When a response from EPA is received, you will be notified. If your request is approved by EPA, the amendment will be processed.

Your consideration in this issue has been appreciated and if you have any questions please call Charles Logan at (904)488-1344.

Sincerely,

Bruce Mitchell  
Environmental Administrator  
Bureau of Air Regulation

BM/CSL/bjb

cc: J. Brown, DEP  
B. Thomas, SWD

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

September 22, 1994

Mr. Charles Logan  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED

SEP 23 1994

Bureau of  
Air Regulation

RE: NSPS Custom Fuel Monitoring Schedule  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility  
AC 53-214903 (PSD-FL-190)

Dear Mr. Logan:

This correspondence is submitted on behalf of Tiger Bay Limited Partnership (TBLP) to request approval of a natural gas custom fuel monitoring schedule and to supplement our September 9, 1994 correspondence. This request is made necessary by TBLP's Specific Permit Condition No. 18 of AC 53-214903 and 40 CFR Part 60.334(b)(2). It is our understanding that this schedule should address sulfur content of the natural gas; the nitrogen content in natural gas is not required. Please amend TBLP's Specific Condition No. 18 as per the attached custom fuel monitoring schedule.

Should you or your department have questions or comments about this letter, please contact me at (713) 735-4087.

Sincerely,

Robert S. Chatham, P.E.  
Senior Environmental Engineer

RSC:kro  
Attachment

cc: Mr. Bill Thomas - FDEP, SW District



## CUSTOM FUEL MONITORING SCHEDULE

### Specific Condition No. 18

#### From

Sulfur and nitrogen content and lower heating value of the fuel being fired in the combustion turbines shall be determined as specified in 40 CFR 60.334(b). Any request for a future custom monitoring schedule shall be made in writing and directed to the Southwest District office. Any custom schedule approved by DER pursuant to 40 CFR 60.334(b) will be recognized as enforceable provisions of the permit, provided that the holder of this permit demonstrates that the provisions of the schedule will be adequate to assure continuous compliance. The records of distillate fuel oil usage shall be kept by the company for a two-year period for regulatory agency inspection purposes. For sulfur dioxide, periods of excess emissions shall be reported if the fuel being fired in the gas turbine exceeds 0.05 percent sulfur by weight.

#### To

This source shall comply with all requirements of 40 CFR 60, Subparts GG and Dc and F.A.C. Rule 17-296.800(2)(a), Standard of Performance for Stationary Gas Turbines and Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. 40 CFR 60.334(b)(2) requires that a custom fuel monitoring schedule shall be followed for natural gas fired at this facility, as follows:

#### Custom Fuel Monitoring Schedule for Natural Gas

1. Monitoring of fuel nitrogen content shall not be required since natural gas is the only fuel being fired in the gas turbine.
2. Sulfur Monitoring
  - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).
  - b. This custom fuel monitoring schedule shall become effective on the date this permit becomes valid. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters. If monitoring data is provided by the applicant which demonstrates consistent compliance with the requirements herein, the applicant may begin monitoring as per the requirements of 2(c).

- c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
  - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state and local air pollution control agencies.

The records of distillate fuel oil usage shall be kept by the company for a two-year period for regulatory agency inspection purposes. For sulfur dioxide, periods of excess emissions shall be reported if the distillate fuel oil being fired in the gas turbine exceeds 0.05 percent sulfur by weight.





DESTEC ENERGY, INC.  
 2500 CITYWEST BLVD., SUITE 150  
 P.O. BOX 4411  
 HOUSTON, TEXAS 77210-4411  
 (713) 735-4000

September 22, 1994

Post-It™ brand fax transmittal memo 7871		# of pages	4
To	Charles Logan	From	Robert Chatham
Co.	FDEP	Co.	
Dept.	Air	Phone #	713 735 4087
Fax #	904 922-6979	Fax #	

Mr. Charles Logan  
 Bureau of Air Regulation  
 Florida Department of Environmental Protection  
 Twin Towers Office Building  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400

RE: NSPS Custom Fuel Monitoring Schedule  
 Tiger Bay Limited Partnership  
 Tiger Bay Cogeneration Facility  
 AC 53-214903 (PSD-FL-190)

Dear Mr. Logan:

This correspondence is submitted on behalf of Tiger Bay Limited Partnership (TBLP) to request approval of a natural gas custom fuel monitoring schedule and to supplement our September 9, 1994 correspondence. This request is made necessary by TBLP's Specific Permit Condition No. 18 of AC 53-214903 and 40 CFR Part 60.334(b)(2). It is our understanding that this schedule should address sulfur content of the natural gas; the nitrogen content in natural gas is not required. Please amend TBLP's Specific Condition No. 18 as per the attached custom fuel monitoring schedule.

Should you or your department have questions or comments about this letter, please contact me at (713) 735-4087.

Sincerely,

Robert S. Chatham, P.E.  
 Senior Environmental Engineer

RSC:kro  
 Attachment

cc: Mr. Bill Thomas - FDEP, SW District

## CUSTOM FUEL MONITORING SCHEDULE

### Specific Condition No. 18

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#### To

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- c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
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3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
  4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state and local air pollution control agencies.

The records of distillate fuel oil usage shall be kept by the company for a two-year period for regulatory agency inspection purposes. For sulfur dioxide, periods of excess emissions shall be reported if the distillate fuel oil being fired in the gas turbine exceeds 0.05 percent sulfur by weight.

Mr. Charles Logan  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
September 22, 1994

bcc: S. A. Kicker  
J. D. Sellers  
S. E. Stevens  
File 1253



Department of  
Environmental Protection

*File Copy*

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

September 21, 1994

Ms. Jewell Harper, Chief  
Air Enforcement Branch  
U.S. EPA., Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

RE: NSPS Custom Fuel Monitoring Schedule  
Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility  
AC 53-214903 [PSD-FL-190]

Dear Ms. Harper:

This letter serves to follow up a telephone conversation with Mr. Mirza Baig regarding a request by Tiger Bay Limited Partnership Corporation (JSC) to amend the Tiger Bay Cogeneration Facility construction permit. The amendment is requested pursuant to 40 CFR 60.334(b)(2), which would allow the applicant to use a custom fuel monitoring schedule for determining the sulfur and nitrogen content of natural gas being fired in combustion turbines at the facility.

Pursuant to 40 CFR 60.334(b)(2), the U.S. EPA Administrator must approve the custom fuel monitoring schedule. The supporting data needed for approval of the request has been enclosed for your review. We would appreciate a response as soon as possible. If you have any questions please call Charles Logan at (904)488-1344.

Sincerely,

*John Brown*  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

Attachment  
CHF/csl

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



DESTEC ENERGY, INC.  
2500 CITYWEST BLVD., SUITE 150  
P.O. BOX 4411  
HOUSTON, TEXAS 77210-4411  
(713) 735-4000

September 9, 1994

RECEIVED

SEP 12 1994

Bureau of  
Air Regulation

Mr. Charles Logan  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Tiger Bay Limited Partnership  
Tiger Bay Cogeneration Facility  
AC 53-214903 (PSD-FL-190)

Dear Mr. Logan:

The Florida Gas Transmission Company (FGT) is routing the natural gas to the facility's combustion turbine via a recently installed pipe line. The facility has no natural gas bulk storage capability.

On behalf of Tiger Bay Limited Partnership, I have attached the following documents in response to the Florida Department of Environmental Regulation letter dated August 18, 1994.

- Item 1: Enclosed is the \$250 processing fee.
- Item 2: Enclosed are several FGT natural gas analysis reports dated December 1993 to August 1994. According to FGT, the analysis method used to determine total sulfur is ASTM 4468. The natural gas that is fired by the combustion turbine will be sampled on the six-acre Tiger Bay site.

Please note that this is being submitted only to the Florida Department of Environmental Regulation. Should you or your department have questions or comments about this letter, please contact me at (713) 735-4087.

Sincerely,

for Robert S. Chatham, P.E.  
Senior Environmental Engineer

RSC:kro  
Attachments (2)

cc: Mr. Bill Thomas - FDEP, SW District (w/o att.)



**TIGER BAY LIMITED PARTNERSHIP**  
**September 8, 1994**

<b>Total Sulfur (GR/CCF) ASTM 4468</b>	<b>Date</b>
0.10	08/17/94
0.08	08/08/94
0.09	08/01/94
0.09	07/26/94
0.06	07/19/94
0.07	07/12/94
0.07	07/06/94
0.08	06/29/94
0.07	06/22/94
0.09	06/14/94
0.05	06/07/94
0.07	05/31/94
0.08	05/24/94
0.08	05/24/94
0.14	05/17/94
0.05	05/11/94
0.03	05/03/94
0.07	04/26/94
0.10	04/19/94
0.05	04/12/94
0.06	04/06/94
0.05	03/29/94
0.08	03/23/94
0.05	03/15/94
0.05	03/08/94

0.07	03/02/94
0.07	02/21/94
0.09	02/15/94
0.04	02/09/94
0.18	01/31/94
0.22	01/26/94
0.28	01/18/94
0.18	01/11/94
0.30	01/05/94
0.18	12/21/93
0.42	12/14/93
0.31	12/07/93
0.48	12/01/93

Source: Florida Gas Transmission Company, Maitland, Florida



05 07-92 11:45AM FROM EPA FPS/SSCD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 14 1992

OFFICE OF  
AIR AND SOLID WASTEMEMORANDUM

**SUBJECT:** Authority for Approval of Custom Fuel Monitoring Schedules Under NSPS Subpart GG

**FROM:** John B. Rasnic, Chief *John B. Rasnic*  
Compliance Monitoring Branch

**TO:** Air Compliance Branch Chiefs  
Regions II, III, IV, V, VI and IX

Air Programs Branch Chiefs  
Regions I-X

The NSPS for Stationary Gas Turbines (Subpart GG) at 40 CFR 60.334(b)(2) allows for the development of custom fuel monitoring schedules as an alternative to daily monitoring of the sulfur and nitrogen content of fuel fired in the turbines. Regional Offices have been forwarding custom fuel monitoring schedules to the Stationary Source Compliance Division (SSCD) for consideration since it was understood that authority for approval of these schedules was not delegated to the Regions. However, in consultation with the Emission Standards and Engineering Division, it has been determined that the Regional Offices do have the authority to approve Subpart GG custom fuel monitoring schedules. Therefore it is no longer necessary to forward these requests to Headquarters for approval.

Over the past few years, SSCD has issued over twenty custom schedules for sources using pipeline quality natural gas. In order to maintain national consistency, we recommend that any schedules Regional Offices issue for natural gas be no less stringent than the following: sulfur monitoring should

05 07-92 11:45AM FROM EPA FFS/SSCD

TO 29195413470

PG06/007

2

be bimonthly, followed by quarterly, then semiannual, given at least six months of data demonstrating little variability in sulfur content and compliance with §60.333 at each monitoring frequency; nitrogen monitoring can be waived for pipeline quality natural gas, since there is no fuel-bound nitrogen and since the free nitrogen does not contribute appreciably to NO<sub>x</sub> emissions. Please see the attached sample custom schedule for details. Given the increasing trend in the use of pipeline quality natural gas, we are investigating the possibility of amending Subpart GG to allow for less frequent sulfur monitoring and a waiver of nitrogen monitoring requirements where natural gas is used.

Where sources using oil request custom fuel monitoring schedules, Regional Offices are encouraged to contact SSCD for consultation on the appropriate fuel monitoring schedule. However, Regions are not required to send the request itself to SSCD for approval.

If you have any questions, please contact Sally M. Farrell at FTS 382-2875.

Attachment

cc: John Craneksw  
George Walsh  
Robert Ajax  
Earl Salo

05-07-92 11:45AM FROM EPA FPS/SSCD

TO 89195413470

P007/007

### Enclosure

#### Conditions for Custom Fuel Sampling Schedule for Stationary Gas Turbines

1. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
2. Sulfur Monitoring
  - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).
  - b. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
  - c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
  - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the State Air Control Board of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the State of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.