

September 20, 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 21 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 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 (see Attachment 1) as per the Lake Cogen Limited's Specific Condition No. 20 (see Attachment 2).

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:
Attachment (2)

cc: Mr. Bill Thomas - FDEP, SW District

ATTACHMENT 1

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

SPECIFIC CONDITIONS:

18. 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.

Rule Requirements

19. This source shall comply with all applicable provisions of Chapter 403, Florida Statutes, Chapters 17-210, 212, 275, 296, 297 and 17-4, Florida Administrative Code and 40 CFR 60 (July, 1992 version).

20. The sources shall comply with all requirements of 40 CFR 60, Subpart GG and Subpart Dc, and F.A.C. Rule 17-296.800,(2)(a), Standards of Performance for Stationary Gas Turbines and Standards of Performance for Industrial, Commercial, and Institutional Steam Generating Units.

21. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements and regulations (F.A.C. Rule 17-210.300(1)).

22. This source shall be in compliance with all applicable provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; 17-296.800: Standards of Performance for New Stationary Sources (NSPS); 17-297: Stationary Sources-Emissions Monitoring; and, 17-4.130: Plant Operation-Problems.

23. If construction does not commence within 18 months of issuance of this permit, then the permittee shall obtain from the Department a review and, if necessary, a modification of the control technology and allowable emissions for the unit(s) on which construction has not commenced (40 CFR 52.21(r)(2)).

24. Quarterly excess emission reports, in accordance with the July 1, 1992 version of 40 CFR 60.7 and 60.334 shall be submitted to the Department's Southwest District office.

Florida Department of Environmental Protection



Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 22, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kevin Fullerton
Project Manager, Air Programs
Lake Cogen Limited
Post Office Box 2562
Tampa, Florida 33601

Dear Mr. Fullerton:

RE: Amendment to Construction Permit
AC 35-196459 (PSD-FL-176)
NSPS Custom Fuel Monitoring Schedule
Lake Cogen Limited

The Department has reviewed your March 17, 1994 letter, with supporting data, requesting an NSPS Custom Fuel Monitoring Schedule for sulfur dioxide (SO₂) and nitrogen oxide (NO_x) 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. NSPS 40 CFR 60.334(b) and 60.334(b)(2) of Subpart GG state that for sources utilizing pipeline quality natural gas 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 their determination. The Department received a letter from EPA, by fax on April 15, 1994, stating that a custom fuel monitoring schedule for this facility was acceptable if it complied with specific items of a custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987 (Refer to attachment No. 2). Since monitoring data was provided by the applicant which demonstrated compliance with the requirements of 2.a and 2.b in the EPA guidance memo, 2.a and 2.b were deleted from the custom fuel monitoring schedule. In compliance with the EPA determination, the permit specific conditions will be amended as follows:

A. Specific Condition Number;

20. From

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.

Mr. Kevin Fullerton
AC 35-196459 (PSD-FL-176)
Permit Amendment
April 22, 1994
Page 2 of 4

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 turbines.
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, 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 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

Mr. Kevin Fullerton
AC 35-196459 (PSD-FL-176)
Permit Amendment
April 22, 1994
Page 3 of 4

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.

B. Attachments to be Incorporated;

- KBN letter received March 21, 1994
- EPA letter received April 15, 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. 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, Florida Statutes.

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;
- (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



Department of Environmental Protection

Bruce JM

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"

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:

Mr. Robert S. Chatham, P.E.
Deslec Energy, Inc.
P.O. Box 4411
Houston, TX 77210-4411

4a. Article Number

2 751 859 984

4b. Service Type

- Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

SEP 27 1993

5. Signature (Addressee)

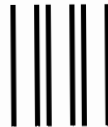
8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

C. X. Lee

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



Official Business

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



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SEP 30 1994

Bureau of
Air Regulation

Print your name, address and ZIP Code here

• Attn: Bruce Mitchell
Dept of Env. Protection MS 5505
2600 Blain Stone Rd
Tall., FL 32399-2400



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 7671		# 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

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. ^{Assessment} 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).

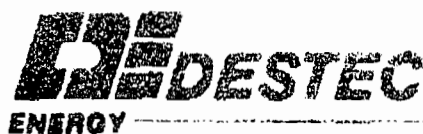
Date that the facility begins receiving & firing

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.
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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



BEST AVAILABLE COPY

DESTEC ENERGY, INC.
2500 CITYWESL 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

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 #	904 422-6979	Fax #	

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

Dear Mr. Logan:

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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:kzo
Attachment

cc. Mr. Bill Thomas - FDEP, SW District

Best Available Copy

CUSTOM FUEL MONITORING SCHEDULE

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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

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Specific Condition No. 18
Custom Fuel Monitoring Schedule
Page 2

BEST AVAILABLE COPY

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

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



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

September 20, 1994

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SEP 26 1994

Bureau of
Air Regulation

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Florida Department of Environmental Protection
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Senior Environmental Engineer

RSC:
Attachment (2)

cc: Mr. Bill Thomas - FDEP, SW District

ATTACHMENT 1

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

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24. Quarterly excess emission reports, in accordance with the July 1, 1992 version of 40 CFR 60.7 and 60.334 shall be submitted to the Department's Southwest District office.

ATTACHMENT 2

Florida Department of
Environmental Protection



Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 22, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kevin Fullerton
Project Manager, Air Programs
Lake Cogen Limited
Post Office Box 2562
Tampa, Florida 33601

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Mr. Kevin Fullerton
AC 35-196459 (PSD-FL-176)
Permit Amendment
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1. Monitoring of fuel nitrogen content shall not be required since natural gas is the only fuel being fired in the gas turbines.
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, 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 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

Mr. Kevin Fullerton
AC 35-196459 (PSD-FL-176)
Permit Amendment
April 22, 1994
Page 3 of 4

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.

B. Attachments to be Incorporated;

- KBN letter received March 21, 1994
- EPA letter received April 15, 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. 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, Florida Statutes.

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;
- (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



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

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,

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

Total Sulfur (GR/CCF) ASTM 4468	Date
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