

Florida Department of
Environmental Protection

Memorandum

TO: Virginia B. Wetherell
FROM: Howard L. Rhodes *HLR*
DATE: August 9, 1994
SUBJECT: Amendment of Permit
Orange Cogeneration L.P.

Attached for your approval and signature is an amended (reissued) permit to construct two cogeneration units in Bartow, Polk County, Florida. The original construction permit was issued on December 30, 1993. It was amended in February, 1994, to allow the permittee to update the performance curves for the combustion turbines. The permittee is now asking for additional time to provide the performance curves for the combustion turbine and clarification of some operation, monitoring, and testing requirements. The reissued permit incorporates all approved amendments since the original permit was issued.

I recommend your approval of the amended (reissued) construction permit.

Attachment

CHF/WH/bjb

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the Matter of an Application
for Permit by:

DEP File No. AC53-233851A
Polk County

Orange Cogeneration Limited Partnership
23046 Avenida De La Carlota, Suite 400
Laguna Hills, California 92650

Enclosed is revised Permit Number AC53-233851A to construct two natural gas/equivalent biogas fired gas turbines with heat recovery steam generators and a steam turbine in Bartow, Polk County, Florida. This permit is being revised to allow additional time for the permittee to furnish the manufacturer's curves for the combustion turbine, clarify the monitoring and testing requirements, and to make footnoted of Table 1 consistent with Specific Condition No. 11. This permit is issued pursuant to Chapter 403, Florida Statutes, and Chapters 17-212 and 17-4, Florida Administrative Code.

A person whose substantial interests are affected by this permit 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, within 14 days of receipt of this Permit. 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; 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.

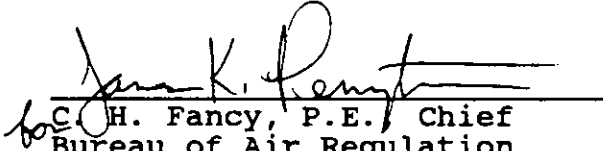
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application 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 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


for C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on 8/16/94 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.

Barbara J. Boutwell 8/16/94
(Clerk) (Date)

Copies furnished to:

B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
L. Novak, PCESD
R. Kosky, KBN (8-25-94)



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
**Orange Cogeneration Limited
Partnership**
23046 Avenida De La Carlota
Suite 400
Laguna Hills, CA 92653

**Permit Number: AC53-233851A
PSD-FL-206A**
Expiration Date: April 1, 1998
County: Polk
**Latitude/Longitude: 27°52'15"N
81°49'31"W**
Project: Two Combustion Turbines

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto and specifically described as follows:

Installation of two natural gas/equivalent biogas fired GE LM 6000 (or equivalent) combustion turbines (CT), two heat recovery steam generators, one steam turbine and, being permitted separately, an auxiliary boiler (AC53-233852). The CTs will be equipped with a staged combustion technology dry low NO_x system to control nitrogen oxides (NO_x) emission. Each CT will be equipped with a 100 ft. high, 11 ft. diameter stack that will handle approximately 300,000 actual cubic feet per minute of flue gas at 230°F. The cogeneration facility will be located on Clear Springs Road, Bartow, Polk County, Florida 33830.

The UTM coordinates of this facility are Zone 17, 418.75 kmE and 3083.0 kmN.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

This permit replaces permit Nos. AC53-233851 and PSD-FL-206.

Attachments are listed below:

1. Application received July 1, 1993
2. DEP July 22, 1993, letter
3. KBN August 5, 1993, letter
4. KBN August 29, 1993, letter
5. Tables 1 and 2, Allowable Emission Rates
6. KBN October 28, 1993, letter
7. KBN October 29, 1993 letter
8. DEP February 18, 1994, letter
9. KBN March 11, 1994, letter
10. DEP March 29, 1994, letter
11. KBN June 22, 1994, letter

PERMITTEE:
Orange Cogeneration Limited
Partnership

Permit Number: AC53-233851A
Expiration Date: April 1, 1998

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Orange Cogeneration Limited
Partnership

Permit Number: AC53-233851A
Expiration Date: April 1, 1998

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Orange Cogeneration Limited
Partnership

Permit Number: AC53-233851A
Expiration Date: April 1, 1998

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (X) Determination of Best Available Control Technology (BACT)
- (X) Determination of Prevention of Significant Deterioration (PSD)
- (X) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
Orange Cogeneration Limited
Partnership

Permit Number: AC53-233851A
Expiration Date: April 1, 1998

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Construction Requirements

1. Dry low NO_x combustion technology systems shall be installed and operated on each combustion turbine (CT).
2. A system, accurate to within 5 percent, to continuously monitor the fuel consumption shall be installed on each CT.
3. The heat recovery steam generator (HRSG) installed on each CT shall not be equipped with an auxiliary/duct burner.
4. Each CT stack shall be equipped with stack sampling facilities (sample ports, work platforms, access, and electrical power) that meet the specifications given in F.A.C. Rule 17-297.345.

Operation Limitations

5. The CTs shall comply with all requirements of 40 CFR 60, Subpart GG (July, 1993), Standard of Performance for Stationary Gas Turbines, which is adopted by reference in F.A.C. Rule 17-296.800(2)(a).

PERMITTEE:
Orange Cogeneration Limited
Partnership

Permit Number: AC53-233851A
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

6. The facility is allowed to operate continuously, 8760 hours per year.
7. Only natural gas/equivalent biogas fuel shall be used for fuel at this facility.
8. Each CT shall have a maximum heat input (LHV) of 368.3 MMBtu/hr, which is approximately 389,300 CFH of natural gas, when using dry low NO_x technology to control NO_x emissions.
9. The operation of this facility shall not create a nuisance or discharge air pollutants that cause or contribute to objectionable odors.

Emission Limitation

10. Prior to January 1, 1998, the maximum NO_x concentration, 1 hour average, from each CT/HRSG unit shall not exceed 25 parts per million by volume dry corrected to 15 percent oxygen at ISO standard ambient conditions (ppmvd @ 15% O₂ at ISO conditions), as determined by the procedures in Specific Conditions No. 16, 17 and 18.
11. After December 31, 1997, the maximum NO_x concentration, 1-hour average, from each CT/HRSG unit shall not exceed 15 ppmvd @ 15% O₂ at ISO conditions as determined by the procedure in Specific Conditions Nos. 16, 17 and 18. Should 15 ppmvd NO_x @ 15% O₂ at ISO conditions not be achieved during the initial compliance tests, the permittee will provide the Department with a plan and schedule to meet this standard. The permittee shall obtain prior approval from the Department for any air pollution control equipment not addressed in this permit that is needed to meet the NO_x emission standard.
12. The maximum emission rates for particulate matter (PM/PM₁₀), volatile organic compounds (VOC), NO_x, and carbon monoxide (CO) shall not exceed any of the rates listed in Table 1, Allowable Emission Rates.
13. Visible emissions shall not exceed 10 percent opacity, 6 minute average.

ORANGE COGENERATION LIMITED PARTNERSHIP
 AC53-233851 (PSD-FL-206)
 42 MW COMBINED CYCLE GAS TURBINE

Table 1 - Allowable Emission Rates for each Combustion Turbine

Pollutant ^a	Control ^e	Basis	Allowable Emissions Standards/Limitations		ISO Conditions ^b		Maximum Corrected ^c		Basis for Limit
			lb/hr	TPY	lb/hr	TPY			
NO _x	DLN	25 ppmvd at 15% O ₂ /ISO at full load	34.8	152.3	37.0	161.9			BACT
CO	DLN	30 ppmvd	27	118.2	27.8	127.0			BACT
PM/PM ₁₀	DLN	5 lb/hr	5	21.9	5	21.9			BACT
VOC	DLN	10 ppmvd	3.86	16.9	3.98	17.4			BACT

^a Pollutant emissions are based on 8,760 hours per year operation firing natural gas or equivalent biogas at 59° F.

^b Emissions rates are based on 100% load and at ISO conditions. Pollutant emission rates may vary depending on the air inlet temperature to the combustion turbine (CT) and CT characteristics. Manufacturer's curves for the emission rate correction to other temperatures at different loads shall be provided to DEP for review by January 1, 1995. Subject to approval by the Department, the manufacturer's curve shall be used to establish pollutant emission rates over a range of temperature for the purpose of compliance determination.

^c Maximum emission rates not to be exceeded.

^d The NO_x maximum concentration will be lowered to 15 ppmvd at 15% O₂ at ISO conditions by 1/1/98 using appropriate combustion technology improvements. Should this level of control not be achieved when the initial compliance demonstration stack tests are performed, the permittee must provide the Department with a plan and schedule to meet this standard. NO_x emission concentrations are to be corrected to ISO conditions to demonstrate compliance with the NO_x emissions standard.

^e Dry Low-NO_x (DLN) combustors.

PERMITTEE:
Orange Cogeneration Limited
Partnership

Permit Number: AC53-233851A
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

14. The emission rates for sulfur dioxide (SO₂) and sulfuric acid mist (H₂SO₄), listed in the following table, shall be used for inventory purposes only.

Maximum Emission Rates for Each Combustion Turbine
for inventory purposes or PSD tracking

Pollutant	Combustion Turbine	
	Dry Low NO _x Combustion lb/hr	TPY
SO ₂	1.11	4.87
H ₂ SO ₄	0.085	0.37

15. Manufacturer's curves for the emission rate correction to other temperatures at different loads shall be provided to DEP for review by January 1, 1995. Until new curves are approved by the Department or the combustion turbines meet the NO_x emission standard of 15 ppmvd @ 15% at ISO conditions (whichever occurs first), the stack, operator, and emission data for the proposed combustion turbines in Table 2-4 (October 28, 1993) will be used. The data will be used to determine compliance with the maximum allowable emission rates of the regulated air pollutants at different air inlet temperatures for these turbines.

Compliance Determination

16. Testing of emissions shall be conducted at 95-100% of the manufacturer's rated heat input based on the average air inlet temperature for the CT during the test. Compliance for NO_x emission limits shall be determined by calculating the concentration of NO_x (ppmvd at 15% O₂ at ISO) and using the turbine manufacturer's thermal throughput rating for the average air inlet temperature by multiplying the permitted emission limit at ISO conditions (59°F) by the ratio of the tested heat input to the maximum heat input (MMBtu/hr) at ISO conditions. Compliance with the visible emissions, NO_x, SO₂, CO, PM/PM₁₀, and VOC emission standards shall be determined within 60 days of achieving maximum production but not later than 180 days after initial firing of each CT (40 CFR 60.8). Compliance with the visible emission, NO_x, and SO₂ standards shall be determined annually thereafter. Unless fuel analyses show the composition of natural gas and the biogas are identical, tests shall be conducted on both natural gas and biogas fuels. If the initial tests or fuel analyses show the emissions of air pollutants from the combustion turbines are independent of the fuel (natural gas or equivalent biogas fuel), then annual compliance tests can be conducted while the combustion turbines are burning either fuel.

PERMITTEE:
Orange Cogeneration Limited
Partnership

Permit Number: AC53-233851A
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

17. Compliance shall be determined by the following test methods listed in 40 CFR 60, Appendix A (July, 1993).

<u>EPA Method</u>	<u>Pollutant</u>
5, 17*, or 201A and 202	PM/PM ₁₀
9	Visible Emissions
10	CO
20	NO _x and SO ₂
18, 25, or 25A	VOC

Other test methods may be used for compliance testing after prior Department approval.

*Stack flue gas temperature must be less than 320°F to use Method 17.

18. NO_x and oxygen monitoring to meet the requirements of 40 CFR 60, Subpart GG, shall be accomplished using a continuous emission monitoring (CEM) system. The CEM system shall meet the requirements of 40 CFR 60, Appendix B. The requirements of 40 CFR 75, Appendices A and B, can be substituted for those of 40 CFR 60 provided the minimum criteria of 40 CFR 60 are met. NO_x monitoring to demonstrate performance with the BACT limit shall be based on one hour average emissions determined on ppmvd @ 15% O₂ at ISO conditions.

Administrative Requirement

19. Prior to January 1, 1998, the permittee shall provide a report showing how the allowable NO_x emissions of 15 ppmvd @ 15% O₂ ISO conditions is achieved by the CTs.

20. The permittee shall provide the Southwest District office with the following notifications required by 40 CFR 60.7:

- When construction commenced within 30 days of commencement of construction
- Anticipated date of initial starting 30 to 60 days prior to startup
- Actual date of startup up within 15 days after the starting
- Notification of the date of the compliance tests not less than 30 days prior to the test

21. Pursuant to F.A.C. Rule 17-210.300(2), Air Operating Permits, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. These reports shall include, but are not limited to the following: sulfur content and the lower heating value of the fuel being fired, fuel usage, hours of operation, and air emissions. Annual reports shall be sent to the Department's Southwest District office by March 1 of each calendar year.

PERMITTEE:
**Orange Cogeneration Limited
Partnership**


Permit Number: AC53-233851A
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

22. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

23. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Virginia B. Wetherell, Secretary

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. William R. Malenius
 Orange Cogeneration Limited Partnership
 23046 Avenida De La Carlota
 Suite 400
 Laguna Hills, California 92650

4a. Article Number
 P 872 562 710

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

7. Date of Delivery
 8-19-94

5. Signature (Addressee)

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

6. Signature (Agent)
Cindy Stone

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

Thank you for using Return Receipt Service.

P 872 562 710



Receipt for Certified Mail

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

Sent to Mr. William R. Malenius	
Street and No. 23046 Avenida De La Carlota	
P.O., State and ZIP Code Laguna Hills, CA 92650	
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: 8/16/94 AC53-233851A	

PS Form 3800, JUNE 1991

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Prattville AL 7/18 3. Chair

2. Libon JB 4. Howard

5. Virginia

PLEASE PREPARE REPLY FOR:	COMMENTS:
<input type="checkbox"/> SECRETARY'S SIGNATURE	Proposed response to KBN's Request to amend Orange Co. Const. permit.
<input type="checkbox"/> DIV/DIST DIR SIGNATURE	
<input type="checkbox"/> MY SIGNATURE	
<input type="checkbox"/> YOUR SIGNATURE	
<input type="checkbox"/> DUE DATE	Request received 6/23/94
ACTION/DISPOSITION	Fee requested 6/27/94
<input type="checkbox"/> DISCUSS WITH ME	Fee received 7/1/94
<input type="checkbox"/> COMMENTS/ADVISE	The marked up copy of the Const permit attached to KBN's 6/22/94 letter shows the areas of the permit that were amended
<input type="checkbox"/> REVIEW AND RETURN	
<input type="checkbox"/> SET UP MEETING	
<input type="checkbox"/> FOR YOUR INFORMATION	
<input type="checkbox"/> HANDLE APPROPRIATELY	
<input type="checkbox"/> INITIAL AND FORWARD	
<input type="checkbox"/> SHARE WITH STAFF	
<input type="checkbox"/> FOR YOUR FILES	

FROM: Wmk DATE: 7/13/94 PHONE: _____

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. Kennard F. Kosky, P.E.
President
KBN Engineering and Applied
Sciences, Inc.
1034 NW 57th Street
Gainesville, Florida 32605

4a. Article Number
P 872 562 715

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

7. Date of Delivery
6-29

5. Signature (Addressee)
Mr. Kennard F. Kosky

6. Signature (Agent)

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.

P 872 562 715



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

Sent to Mr. Kennard F. Kosky, P.E.	
Street and No. 1034 NW 57th Street	
P.O., State and ZIP Code Gainesville, FL 32605	
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: 6/27/94 AC 53-233851, PSD-FL-206	