



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 18, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas F. Donovan  
Orange Cogeneration Limited Partnership  
1901 Clear Springs Road  
Bartow, Florida 33830

Dear Mr. Donovan:

Re: AC 53-233851

The Department acknowledges receipt of your February 3, 1994, letter responding to Specific Condition No. 17 of the referenced permit. You stated that two GE LM 6000 combustion turbines (CT) were selected for the proposed cogeneration facility on November 8, 1993, but that the manufacturer's emission rate correction curves at ambient temperatures for different operating loads will not be available until mid - 1994. We also note that the units for the nitrogen oxides emission standard in the construction permit are parts per million by volume corrected to 15 percent oxygen and ISO standard ambient conditions (ppmvd @ 15% O<sub>2</sub> ISO conditions). The units for this emission standard in GE's November 19, 1993, letter to Mr. Williams does not mention the ISO standard ambient condition correction. You may want to clarify this matter with GE.

In response to your letter, the Department is amending Specific Condition No. 17 of Permit No. AC 53-233851 as follows:

FROM:

Manufacturer's curves for the emission rate correction to other temperatures at different loads shall be provided to DEP for review 90 days after selection of the CT. Subject to approval by the Department, the manufacturer's curve may be used to establish pollutant emission rates over a range of inlet air temperatures for the purpose of compliance determination. The maximum allowable emissions at different air inlet temperatures shall be based on the CT manufacturer's curve but shall not exceed the maximum rates listed in Tables 1 and 2, Allowable Emission Rates.

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3-10-94

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TO:

Manufacturer's curves for the emission rate correction to other temperatures at different loads shall be provided to DEP for review by September 1, 1994. Until new curves are approved by the Department or the combustion turbines meet the NO<sub>x</sub> emission standard of 15 ppmvd @ 15% ISO conditions (whichever occurs first), the stack, operating, and emission data for the proposed combustion turbines in Tables 2-2, 2-3, and 2-4 of the application 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.

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;

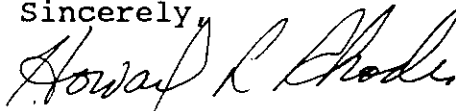
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(g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

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 request/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 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, F.A.C.

A copy of this letter must be filed with Permit No. AC 53-233851 and shall become a condition of that permit.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/WH/bjb

Attachment: Orange Cogeneration February 3, 1994 letter

cc: Bill Thomas, SWD  
Linda Novak, PCESD  
K. Kosky, KBN

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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 2/23/94 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      2/23/94  
Clerk      Date

Florida Department of  
**Environmental Protection**

**Memorandum**

CLAIR

TO: Howard L. Rhodes  
FROM: Clair H. Fancy   
DATE: February 18, 1994  
SUBJ: Amendment of Permit  
Orange Cogeneration L.P.

Attached for your approval and signature is a letter that will amend the construction permit for a natural gas fired cogeneration facility that is under construction in Bartow, Polk County, Florida. The amendment will allow additional time for the permittee to update the performance curves for the combustion turbines.

I recommend your approval and signature.

CHF/WH/bjb

Attachment