



September 10, 1997

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BUREAU OF
AIR REGULATION

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: DRAFT Title V Permit No.: 1050231-001-AV
Orange Cogeneration Facility

Dear Mr. Sheplak:

I am writing to provide comments on the Draft Title V Air Operation Permit for the Orange Cogeneration Facility. I recently received a copy of a letter dated September 3, 1997, from Mr. Joseph Kahn, P.E. from your office to Mr. David McNeal of the EPA regarding a custom fuel monitoring plan for the Orange Cogeneration Facility. We request that such a plan be included in Section III, Subsections A.12 and B.10 of the Title V Air Operation Permit. In addition, we request the following modifications to the Draft Title V Air Operation Permit:

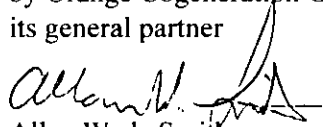
1. The correct address for the facility is: 1901 Clear Springs ~~Mine~~ Road, Bartow, FL 33830. The address for the Permittee in the Draft permit is 1901 Clear Springs Road, Bartow, FL 33830.
2. There is a typo in the third paragraph of Section I, Subsection A. It should read "..., this facility is not a major source ..."
3. I would like to clarify something in Section III, Subsection A. in the first chart where the emissions units are described. Typically the steam produced by the HRSGs is delivered to the steam turbine. Steam is then extracted from the steam turbine and delivered to the juice processing facility. Technically the HRSGs supply the steam, so I do not know that a wording change is necessary, but I wanted to ensure that you understand how the process typically works.
4. The second sentence of Section III, Subsection A.9 defines the permitted capacity as "95 - 100 percent of the maximum heat input rate allowed by this permit, achievable for the average ambient air temperature during the test." Both of the combustion turbines at the Orange Cogeneration Facility have inlet air conditioning capability which allows the operators to control, to some degree, the inlet air temperature to the combustion turbines. Should the word ambient be stricken from the definition?
5. The requirement to maintain records of the sulfur content of the biogas fuel referenced in Section III, Subsections A.12 and B.10 should be contingent upon biogas fuel becoming available.

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6. the first chart in Section III, Subsection B where the emissions unit is described should read as: "..., with a maximum heat input of 100 mmBtu/hr ..."

I hope these comments help in the preparation of the Final Title V Air Operation Permit for the Orange Cogeneration Facility. Please contact me at 941-682-6338 with any questions regarding these comments.

Sincerely,
Orange Cogeneration Limited Partnership
by Orange Cogeneration GP, Inc.
its general partner



Allan Wade Smith
General Manager

cc: Dennis Oehring - CSWE Orange Cogeneration Facility



August 27, 1997

Mr. Scott M. Sheplak, P.E.
Administrator, Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
AUG 28 1997
BUREAU OF
AIR REGULATION

Re: Public Notice of Intent to Issue Title V Air Operation Permit
Orange Cogeneration Facility
Permit No: 1050231-AV

Dear Mr. Sheplak:

Please find enclosed the public notice from the Polk County Democrat and Affidavit of Publication.

If you have any questions please call me at (941) 682-6338.

Sincerely,
Orange Cogeneration Limited Partnership
By: Orange Cogeneration G.P., Inc.
its general partner

Allan Wade Smith
General Manager

9/2/97 Joe Kahn
Scott Sheplak