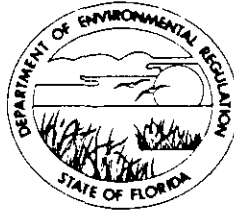


STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

December 1, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Harry Schindehette, Director  
311 North Indian River Drive  
Ft. Pierce Utilities Authority  
Post Office Box 3191  
Ft. Pierce, Florida 33448

Dear Mr. Schindehette:

Re: File No. AC 56-141460

The Bureau of Air Quality Management has received your application for permit to construct a new cogeneration system at your facility in Ft. Pierce, St. Lucie County, Florida. We have reviewed your data and have determined your application is not complete.

Therefore, to complete the application, you need to submit the following information:

In reference to Attachment No. 9, Contemporaneous Emissions Calculations, we want to confirm that the decrease of emissions listed on page 6 are creditable in accordance with the Prevention of Significant Deterioration regulations. Rule 17-2.500(2)(e)4., FAC, which reads as follows:

4. Creditable Emissions Changes.

a. An increase or decrease in the actual emissions or in the quantifiable fugitive emissions of a facility is creditable if:

(i) The Department has not relied on it in issuing a permit under the provisions of Rule 17-2.500 or EPA has not relied on it in issuing a permit under the provisions of 40 CFR 52.21, which permit is in effect when the increase in emissions of the modification occurs; or

(ii) The Department has not relied on it in demonstrating attainment, defining reasonable further progress, or issuing a permit under the provisions of Rule 17-2.17 (repealed), 17-2.510, or 17-2.650, which permit is in effect when the increase in emissions of the modification occurs.

b. An increase or decrease in the actual emissions or in the quantifiable fugitive emissions of sulfur dioxide or particulate matter which occurs before the applicable baseline date is

Mr. Harry Schindehette  
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creditable only to the extent that it must be considered in calculating the amount of any maximum allowable increase in ambient concentration remaining available.

c. A decrease in the actual emissions or in the quantifiable fugitive emissions of a facility is creditable only if:

(i) The old level of actual emissions, the old level of federally enforceable allowable emissions, or the old level of allowable emissions under Rule 17-2.650, whichever is lowest, exceeds the new level of actual emissions;

(ii) It is federally enforceable on and after the date that the owner or operator obtains from the Department a permit to construct the new or modified facility; and

(iii) It has approximately the same qualitative significance for public health and welfare as that attributed to the increase in the emissions of the modification.

Please refer specifically to Rules 17-2.500(2)(e)4.a.(i), 17-2.500(2)(e)4.a.(ii) and 17-2.500(2)(e)4.c.(ii). Please document that with copies of the construction and current operation permits for these sources. List the maximum emissions (lb/hr and ton/year) you are requesting from existing sources at this facility.

In addition, the following data needs some clarification and/or response:

1. Is the  $285.8 \times 10^6$  Btu/hr the lower heating value of the fuel (LHV)?
2. Is the 12.87 kilojoules/watt-hr the actual manufacturer's rated heat rate at manufacturer's rated load, or actual measured heat rate based on LHV of fuel as measured at actual peak load for the turbine? Please refer to 40 CFR, Subpart GG. The efficiency factor must be based on the gas turbine efficiency itself, not the overall efficiency of the gas turbine combined with other equipment.
3. What is the maximum heat input to the boiler based on operating data?
4. What is the maximum hours a year that fuel oil No. 2 will be used in the proposed equipment?

We will resume reviewing your application after receipt of the requested information.

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Please call Teresa Heron at (904)488-1344 or write to me if you have any questions on this matter.

Sincerely,



C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/TH/s

cc: S. Brooks  
L. Stebbins

P 274 010 115

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

\* U.S.G.P.O. 1985-460-794

PS Form 3800, June 1985

Harry Schindehette, Dir. <del>Ft. Pierce Utilities Authori.</del> Street and No. P.O. Box 3191	
P.O., State and ZIP Code Ft. Pierce, FL 33448	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 02/12/88 Permit: AC 56-141460	

SENDER: Complete items 1 through 4. Add additional boxes in items 5 and complete items 6 through 8. If you do not wish to use items 5 through 8, please check the return receipt box. If you provide you the name of the person delivered to and the date of delivery, see the following services are available. Consult computer for cost. Check certain for additional services or insurance.

1. Article Number  
 P 274 010 115

2. Registered  Insured   
 Certified  Registered   
 Express Mail  Registered  Registered

3. Address of Recipient  
 Mr. Harry Schindehette, Director  
 Ft. Pierce Utilities Authority  
 P.O. Box 3191  
 Ft. Pierce, FL 33448

4. Address of Sender  
 Registered  Registered  
 Certified  Registered  
 Express Mail  Registered  Registered

5. Date of Delivery  
 228 17 888

6. Return Receipt (OPTIONAL) (Requested and Fee Paid)

7. Date of Delivery  
 228 17 888

8. Return Receipt (OPTIONAL) (Requested and Fee Paid)

U.S.G.P.O. 1985-460-794

DOMESTIC RETURN RECEIPT