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**BUREAU OF
AIR REGULATION**

H. D. KING POWER PLANT

311 North Indian River Drive
Fort Pierce, Florida 34950

(561) 464-5792

December 31, 1997

Mr. Edward Svek
Bureau of Air Regulations
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**Subject: Comments on the Proposed Title V Permit No. 1110003-003-AV
for the H. D. King Power Plant**

Dear Mr. Svek:

We would like to comment on the proposed Title V Permit for the H. D. King Power Plant (No. 1110003-003-AV). Subsection C of Section I (Relevant Documents) references a letter that we had sent you on November 6, 1997. It was our understanding that the conditions contained within this letter would be incorporated into the permit. However, according to the language of the above referenced subsection, the conditions contained within the letter are not part of the permit, but rather are considered only on file.

We hereby request that you include the November 6, 1997 letter as part of the permit. We believe that such action is necessary to ensure that future FDEP compliance personnel will fully understand the intent of the letter and associated requirements of the permit. We have enclosed a copy of the letter for your review.

Please advise us if you cannot incorporate this letter into the permit so that we may take appropriate action. If you have any questions or comments please do not hesitate to call me at 561-466-1600, extension 3400.

Sincerely,

A handwritten signature in black ink, appearing to read "TWR", is written over the word "Sincerely,".

Thomas W. Richards, P.E.
Director of Operations

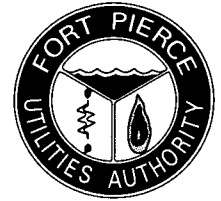
TWR:rwb/s

Enclosure

1/6/98 cc: Ed Svek

FORT PIERCE UTILITIES AUTHORITY

"Committed to Quality"



206 South Sixth Street (34950)
Post Office Box 3191
Fort Pierce, Florida 34948-3191

Phone 561-466-1600
Fax 561-489-0396

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BUREAU OF
AIR REGULATION

November 6, 1997

Mr. Edward Svek
Bureau of Air Regulations
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: **Proposed Permit Determination, H. D. King Power Plant**
Permit No. 1110003-003-AV

Dear Mr. Svek:

We have reviewed the DEP's responses to our comments on the H. D. King Power Plant's proposed permit. Our comments were transmitted to the DEP in a letter dated July 17, 1997. The following reiterates our understanding of some of the comments and responses on conversations between our consultant, Ms. Linda Long of R. W. Beck, and yourself.

10.R. Stack testing on the combustion turbine, E.U.-003, at four load points within the operating range of the turbine as specified in 40 CFR 60.335(a)(2) will only be required when the steam to fuel ratios need to be reestablished. If the steam to fuel ratios do not need to be reestablished, stack testing will only be required at full load.

14.R. Specific condition A.30.4.b and 4.c specifically limit emissions of lead and NESHAP pollutants with no applicable requirement for compliance testing of lead or lead components measured as lead from a pipeline natural gas emissions unit. It is our understanding that compliance testing for lead or lead components is not a requirement.

17.R. Specific condition A.36 simply states that a sketch of the stack or duct showing eight diameters upstream and two diameters downstream of the sampling ports is to be submitted with the compliance test reports. This statement does not supersede the alternative sampling port location specified in USEPA Method 1 as two stack or duct diameters downstream and a half diameter upstream from any flow disturbance. Specific condition A.36 requires submitting a sketch showing where the eight and two diameters location would be.

30.R. Specific condition A.20 specifies that compliance with the sulfur dioxide standard by calculations based on the fuel analysis for sulfur content can be used. Compliance testing is referenced because it is the standard method of determining sulfur dioxide emissions and can be required by the agency upon request. However, the use of fuel analysis as the compliance method was approved in accordance with Rule 62.297.620.

32.R. Specific conditions B.32., C.32., and D.35 specifically state that annual and permit renewal compliance testing for particulate matter emissions is not required if liquid fuels or a combination of liquid and gaseous fuels is burned for less than 400 hours per year. If in any year the units burn these fuels for 400 or more hours per year, compliance testing will be required. Results of compliance testing in the year that the units burn these fuels for 400 or more hours can be used at the following permit renewal time even if the year of the compliance test does not correspond to the year of renewal.

If the above information does not correspond with your understanding, please contact us at 561-466-1600, extension 3400.

Sincerely,

FORT PIERCE UTILITIES AUTHORITY



Thomas W. Richards, P.E.
Director of Operations

TWR/s

pc: H. Lamb
E. Leongomez
S. Treece
J. Stevens
L. Long/R. W. Beck

11/10/97 cc - Ed Svek

Date: 11/10/97 8:36:17 AM
From: Elizabeth Walker TAL
Subject: New Posting
To: See Below

There is a new posting available on the Florida website

1110003003AV
FT PIERCE UTILITIES AUTHORITY

Proposed

The notification letter is encoded and attached. If you have any questions, please let me know.

Thanks
Elizabeth