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ELECTRIC



GAS  
SEWER

206 S. SIXTH STREET \* P. O. BOX 3191 \* FORT PIERCE, FLORIDA 34948 \* PHONE (407) 464-5600

January 15, 1991

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DER-BAQM

Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Attention: Mr. C. H. Fancy

RE: AC 56-185836 - Fort Pierce Utilities  
Authority - H. D. King, Unit 9

Dear Mr. Fancy:

This letter is in response to your comment letter dated January 4, 1991.

As stated in our December 5, 1990 letter, we are requesting that Unit 9 be permitted to burn natural gas only. The 1990 NO<sub>x</sub> compliance test for Unit 9 was conducted on December 27, 1990 and will be provided under separate cover as soon as the results are received from the testing contractor.

We emphasize that this permit application is for Unit 9 only. It was previously demonstrated that, for Unit 9, only NO<sub>x</sub> has the potential to be emitted at levels above the PSD significant emission rates. Therefore, a review of SO<sub>2</sub> and particulate matter impacts from Units 6, 7, and 8 is not applicable to the Unit 9 permit application.

Units 6, 7, and 8 are currently permitted to burn natural gas and fuel oil. Applications to renew these permits request a continuation of this authority. A separate emergency order has been requested which would relax the Units 6, 7, and 8 SO<sub>2</sub> and particulate limitations found in the existing Unit 9 permit. The SO<sub>2</sub> and particulate matter modeling requested in support of this emergency order has been completed for Units 6, 7, and 8. The results of this modeling were provided in our January 4, 1991 response to DER's December 26, 1990 letter. It demonstrated combined maximum impacts well below the AAQS.

~~Construction on Unit 8 began prior to January 6, 1975 and operational testing began in March of 1976. Based on FAC-17-2.500(4)(b)3.b., Unit 8 is a baseline source, not an increment consumer. Consequently, Unit 8 impacts have not (nor need not) be separately modeled.~~

Florida Department of Environmental Regulation  
Mr. C. H. Fancy

B&V Project 16589  
January 15, 1991

Once again, we are anxious for your letter of completeness on our Unit 9 permit application.

Sincerely,



Harry Schindehette, P.E.  
Director of Utilities

ckw

cc: Mr. Jack Miller  
Mr. Harry Lamb  
Mr. Steve Day

*P. Lewis*

*B. Andrews*

*C. Holladay*

*D. Harper, EPA*

*J. Kalamon SE Dist.*