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BUREAU OF AIR REGULATION

October 24, 2001

Mr. Alvaro Linero, P.E. Administrator, New Source Review Section Bureau of Air Regulation Department of Environmental Protection 111 South Magnolia Drive, Suite 4 Tallahassee, FL 32399

Responses to Florida DEP Comments on CPV Cana Power Generating Facility DEP File No. 1110103-001-AC (PSD-FL-323)

Reference: Letter from A. A. Linero to G. Lambert dated October 2, 2001

Dear Mr. Linero:

Enclosed please find seven copies of CPV Cana, Ltd's. response to the referenced letter. If you have any questions, please do not hesitate to contact me at (781) 848-0253.

Sincerely,

Peter J. Podurgiel

Put fly

Vice President Development

Enclosures

cc: Michael Anderson, TRC

J. Kum

Cathy Sellers, Moyle, Flanagan

Scott Sumner, P.E. TRC

1 balbrath

J. Galdman, ScD B. Worley, EPA J. Bunyak, NPS

35 Braintree Hill Office Park, Suite 107, Braintree, MA 02184

PHONE: (781) 848-0253

FAX: (781) 848-5804

Responses to Florida DEP Comments on CPV Cana Power Generating Facility DEP File No. 1110103-001-AC (PSD-FL-323)

The Florida Department of Environmental Protection (DEP) notified CPV via certified mail, dated October 2, 2001, of two additional information requests needed for application completeness. The three requested items, numbered 1., 2. and 3., are restated below for completeness. CPV's response to each request is provided herein.

1. **Request:** Proposed Emissions for Sulfuric Acid Mist are 7.62 TPY. This is above the PSD limit of 7 TPY. Please complete a BACT analysis for this pollutant.

Response: Attachment A contains Section 5.4 and Table 5-4 of the <u>CPV Cana Power Generating Facility Application for Air Permit</u> (the air permit application), which have been modified using the black-line editing function to include Sulfuric Acid Mist in the BACT analysis. It demonstrates that the use of low sulfur fuels results in the BACT emission rate limits for Sulfuric Acid Mist. For completeness, Tables 3-1 and 3-3 of the air permit application have also been modified to include sulfuric acid mist and the emissions form ancillary sources (see Request 2).

2. Request: Submit potential emissions for the fire pump and the diesel emergency generator as well as the diesel storage tank units. Although these units may be exempted from permitting (based on emissions and capacity), we need to include them in the construction permit.

Response: Attachment B contains the calculations of the potential emissions for the fire pump and the diesel emergency generator as well as the diesel storage tank. Emissions for the fire pump and diesel emergency generator were calculated using published emissions factors and an annual operating limit of 500 hours for each piece of equipment. Emissions for diesel storage tank were calculated using the TANKS program.

3. **Request:** What is the ammonia's concentration in the storage tank (i.e. < or > 20 percent)? Please refer to 40CFR 68, Chemical Accident Provisions.

Response: Section 3.8 of the air permit application states that the project will utilize aqueous ammonia with a concentration of less than 20 percent. It will therefore not require a Risk Management Plan (RMP) under the Chemical Accident Provisions of 40 CFR 68.

Scott G. Sumner, P.E.

Date

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein*, that:

- (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
- (2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

DO OCTOBER

Date

(seal)

^{*} Attach any exception to certification statement.

Attachment A Revisions to CPV Cana BACT Analysis

Table 3-1	New Power Generation Equipment Criteria
	Pollutant Emissions CPV Cana ¹

Pollutant	Potential Emissions ² (Tons/Year)
NO_x	96 102
SO_2	76
CO	226 228
PM/PM_{10}^{3}	96
VOC	15 <u>16</u>
<u>H₂SO₄</u>	7.62

Source: GE performance data in Appendix C.

Annual emission estimates based on combustion turbine operating 8760 hours at maximum hourly emission rate.

PM/PM₁₀ value includes combustion turbines and cooling tower drift.

Table 3-3 PSD Significant Emissions Increase Level and CPV Cana Project Net Emission Rates (Pursuant to 40 CFR 52.21 (b) (23) (i))

Pollutant	Significant Emissions Increase Level (TPY)	Annual Net Emissions Increases (TPY)
NO _x	40	96 <u>102</u>
SO ₂	40	76
CO	100	226 228
PM	25	96
PM_{10}	15	96
VOC	40	15 <u>16</u>
<u>H₂SO₄</u>	7_	<u>7.62</u>

5.4 BACT Analysis for Sulfur Dioxide and Sulfuric Acid

Strategies for the control of <u>sulfur dioxide</u> (SO₂) <u>and sulfuric acid</u> (H₂SO₄) emissions can be divided into pre- and post-combustion categories. Pre-combustion controls entail the use of low sulfur fuels or fuel sulfur removal. Post-combustion controls comprise various wet and dry flue gas de-sulfurization (FGD) processes. However, FGD alternatives are undesirable for use on combustion turbine power facilities due to <u>high-large</u> pressure drops across the device, and would be particularly impractical for the large flue gas volumes and low SO₂ <u>and H₂SO₄</u> concentrations.

The new power generation equipment will fire natural gas as the primary fuel (0.0065% sulfur by weight) and 0.05% sulfur distillate oil as back up, which is considered BACT for SO₂ and H₂SO₄ emissions. Based on these clean fuels, the proposed maximum SO₂ and H₂SO₄ emission rates for natural gas firing is are 10 lb/hr and 1 lb/hr, respectively. The proposed maximum SO₂ and H₂SO₄ emission rates for distillate oil firing is are 99 lb/hour and 10 lb/hr, respectively.

Table 5-2 Summary of Proposed BACT Limits for the CPV Cana Project						
Pollutant	Control Technology	Proposed BACT Limit				
Nitrogen Oxides	Low - NO _x Combustion Technology	2.5 ppmvd @ 15% O ₂ (gas)				
	Selective Catalytic Reduction	10 ppmvd @ 15% O ₂ (oil)				
Carbon Monoxide* Combustion Controls		9 ppmvd (gas)				
		15 ppmvd (power augmentation				
		mode)				
		24 ppmvd (oil)				
Particulate Matter-	Inherently Clean Fuels	19 lb/hr (gas)				
Combined-Cycle System	Combustion Controls	44 lb/hr (oil)				
Particulate Matter-	High Efficiency Drift Eliminators	0.0005% drift				
Cooling Tower						
Sulfur Dioxide	Low Sulfur Fuels	10 lb/hr (gas)				
		99 lb/hr (oil)				
Sulfuric Acid	Low Sulfur Fuels	1 lb/hr (gas)				
		10 lb/hr (oil)				

^{*}FDEP approved the following CO emission limits @ 15% O2 for the CPV Pierce Project: 8 ppmvd (gas)
13 ppmvd (power augmentation mode)
17 ppmvd (oil)

Attachment B

Emissions Calculations for Ancillary Equipment

CPV Cana Assumptions and Emission for the Fire Water Pump

Operating Hours	500
Type Fuel	Diesel
Fuel Heating Value (Btu/gal)	140,000
Gallons per Hour	13.8
Fuel Input in MMBtu per Hour	1.93
Assumed Efficiency	33%
BHP Rating	250
Annual Fuel Usage (gal/year)	6,886
Sulfur Content in Fuel	0.05%

Sulfur Content in Fuel	0.05%	F		St T	1 7	F
		Emission		Short Term	Long Term	Federal
	CAS#	Factor (Ibs/MMBtu)	C	Emissions	Emissions	HAP
	ÇAS#	(IDS/MMBtu)	Source	(lb/hr)	(ton/yr)	
Criteria Air Pollutants						
PM	na	0 310	2	0.598	0.149	
PM10	na	0 310	2	0.598	0.149	
SOx	na	0 051	1	0.097	0.024	
CO	630-08-0	0 950	1	1.832	0.458	
VOC	na	0.349	2	0.673	0.168	
NOx	na	4.410	2	8.503	2.126	
łazardous Air Pollutants						
1,3 Butadiene	106-99-0	3.91E-05	2	7.54E-05	1.88E-05	yes
Acetaldehyde	75-07-0	7.67E+04	2	1.48E-03	3.70E-04	•
Acrolein	107-02-8	9.25E-05	2	1.78E-04	4.46E-05	•
Benzene	71-43-2	9.33E-04	2	1.80E-03	4.50E-04	•
Beryllium	7440-41-7	6.90E-08	3	1.33E-07	3.33E-08	•
Formaldehyde	50-00-0	1.18E-03	2	2.28E-03	5.69E-04	•
Mercury	na	3.01E-07	3	5.81E-07	1.45E-07	•
Napthalene	91-20-3	8.48E-05		1.64E-04	4.09E-05	,
PAH	130498-29-2	1.68E-04	2	3.24E-04	8.10E-05	,
Acenaphthene (POM)	83-32-9	1.42E-06	2	2.74E-06	6.84E-07	,
Acenaphthylene (POM)	208-96-8	5.06E-06	2	9.76E-06	2.44E-06	,
Anthracene (POM)	120-12-7	1.87E-06	2	3.61E-06	9.01E-07	•
Benz(a)anthracene (POM)	56-55-3	1.68E-06	2	3.24E-06	8.10E-07	•
Benzo(a)pyrene (POM)	50-32-8	1.88E-07	2	3.62E-07	9.06E-08	,
Benzo(b)fluoranthene (POM)	205-99-2	9.91E-08	2	1.91E-07	4.78E-08	•
Benzo(g,h,i)perylene (POM)	191-24-2	4.89E-07	2	9.43E-07	2.36E-07	,
Benzo(k)fluoranthene (POM)	207-08-9	1.55E-07	2	2.99E-07	7.47E-08	,
Chrysene (POM)	218-01-9	3.53E-07	2	6.81E-07	1.70E-07	,
Dibenzo(a,h)anthracene (POM)	53-70-3	5.83E-07	2	1.12E-06	2.81E-07	•
Fluoranthene (POM)	206-44-0	7.61E-06	2	1.47E-05	3.67E-06	,
Fluorene (POM)	86-73-7	2.92E-05	2	5.63E-05	1.41E-05	,
Indeno(1,2,3-cd)pyrene (POM)	193-39-5	3.75E-07	2	7.23E-07	1.81E-07	,
Naphthalene (POM)	91-20-3	8.48E-05	2	1.64E-04	4.09E-05	-
Phenanthrene (POM)	85-01-8	2.94E-05	2	5.67E-05	1.42E-05	,
Pyrene (POM)	129-00-0	4.78E-06	2	9.22E-06	2.30E-06	,
Toluene	108-88-3	4.09E-04	2	7.89E-04	1.97E-04	,
Xylenes	1330-20-7	2.85E-04	2	5.50E-04	1.37E-04	•
Other Non-Criteria Air Pollutants	.000.20-7	2.002-04	-	3.30E 04		,03
		7.000.00	2	4 355 04	3 375 44	
Aidehydes	na 445.07.4	7.00E-02	2	1.35E-01	3.37E-02	
Propylene	115-07-1	2.58E-03	2	4.97E-03	1.24E-03	
Sulfuric Acid	7664-93-9	1.03E-03	3/4	2.00E-03	4.99E-04	no
<u>Totals</u>					4.045.00	
Federal HAPs					1.91E-03	
Other Non-criteria Pollutants					3.55E-02	

^{1.} Emissions based on AP-42 Compilation of Air Pollutant Emission Factors Volume I: Stationary Point and Area Sources; Tables 3.4-1, 5th Edition - Supplement B November, 1996.

^{2.} Emissions based on AP-42 Compilation of Air Pollutant Emission Factors Volume I: Stationary Point and Area Sources; Tables 3.3-1 and 3.3-2, 5th Edition - Supplement B November, 1996.

Emissions based on Toxic Air Pollutant Emission Factors - A Compilation for Selected Air Toxics Compounds and Sources. October, 1990, EPA-450/2-90-011.

^{4.} Emission factor for sulfuric acid is 8 9(S) ng/J

CPV Cana Assumptions and Emission for the Emergency Generator

Operating Hours	500
Type Fuel	Diesel
Sulfur Content of Fuel	0.05%
Fuel Heating Value (Btu/gal)	140,000
Gallon per Hour	3 6
Fuel Input in MMBtu per Hour	5.0
Output in kW	500
Assumed Heat Rate (Btu/kW-hr)	10,000

		Emission Factor		Short Term Emissions	Long Term Emissions	Federa HAP
	CAS#	(lbs/MMBtu)	Source	(lb/hr)	(ton/yr)	
riteria Air Pollutants						
РМ	na	0.068	2	0.340	0.085	
PM10	na	0.057	2	0.287	0.072	
SOx	na	0.051	1	0.253	0.063	
co	630-08-0	0.850	1	4.250	1.063	
VOC	na	0.090	1	0.450	0.113	
NOx	na	3.20	1	16.00	4.000	
Hazardous Air Pollutants						
Acetaldehyde	75-07-0	2.52E-05	3	1.26E-04	3.15E-05	ye
Acrolein	107-02-8	7.88E-05	3	3.94E-04	9.85E-05	ye
Benzene	71-43-2	7.76E-04	3	3.88E-03	9.70E-04	ye
Beryllium		6.90E-08	5	3.45E-07	8.63E-08	ye
Formaldehyde	50-00-0	7.89E-05	3	3.95E-04	9.86E-05	ye
Mercury	na	3.01E-07	5	1.51E-06	3.77E-07	ye
Napthalene	91-20-3	1.30E-04	4	6.50E-04	1.63E-04	ye
PAH	130498-29-2	2.45E-04	4	1.22E-03	3.06E-04	ye
Acenaphthene (POM)	83-32-9	4.68E-06	4	2.34E-05	5.85E-06	ye
Acenaphthylene (POM)	208-96-8	9.23E-06	4	4.62E-05	1.15E-05	ye
Anthracene (POM)	120-12-7	1.23E-06	4	6.15 E- 06	1.54E-06	ye
Benz(a)anthracene (POM)	56-55-3	6.22E-07	4	3.11E-06	7.78E-07	ye
Benzo(a)pyrene (POM)	50-32-8	2.57E-07	4	1.29E-06	3.21E-07	ye
Benzo(b)fluoranthene (POM)	205-99-2	1.11E-06	4	5.55E-06	1.39E-06	ye
Benzo(g,h,i)perylene (POM)	191-24-2	3.46E-07	4	1.73 E- 06	4.33E-07	ye
Benzo(k)fluoranthene (POM)	207-08-9	2.18E-07	4	1.09E-06	2.73E-07	ye
Chrysene (POM)	218-01-9	1.53E-06	4	7.65E-06	1.91E-06	уе
Dibenzo(a,h)anthracene (POM)	53-70-3	3.46E-07	4	1.73E-06	4.33E-07	
Fluoranthene (POM)	206-44-0	4.03E-06	4	2.02E-05	5.04E-06	ye
Fluorene (POM)	86-73-7	1.28E-05	4	6.40E-05	1.60E - 05	ye
Indeno(1,2,3-cd)pyrene (POM)	193-39-5	2.57E-07	4	1.29E-06	3.21E-07	ye
Naphthalene (POM)	91-20-3	1.30E-04	4	6.50E-04	1.63E-04	ye
Phenanthrene (POM)	85-01-8	4.08E-05	4	2.04E-04	5.10E-05	ye
Pyrene (POM)	129-00-0	3.71E-05	4	1.86E-04	4.64E-05	
Toluene	108-88-3	2.81E-04	3	1.41E-03	3.51E-04	-
Xylenes	1330-20-7	1.93E-04	3	9.65E-04	2.41E-04	ye
Other Non-Criteria Air Pollutants						
Propylene	115-07-1	2.79E-03	3	1.40E-02	3.49E-03	n
Sulfuric Acid	7664-93-9	1.03E-03	5/6	5.17E-03	1.29E-03	n
Totals						
Federal HAPs					2.26E-03	
Other Non-criteria Pollutants					4.78E-03	

^{1.} Emissions based on AP-42, Table 3.4-1

^{2.} Emissions based on AP-42, Table 3.4-2

^{3.} Emissions based on AP-42, Table 3.4-3.

^{4.} Emissions based on AP-42, Table 3.4-4.

Emissions based on Toxic Air Pollutant Emission Factors - A Compilation for Selected Air Toxics Compounds and Sources: October, 1990, EPA-450/2-90-011.

^{6.} Emission factor for sulfuric acid is 8.9(S) ng/J.

TANKS 4.0

Emissions Report - Summary Format Tank Identification and Physical Characteristics

Identification

User Identification: CPV Cana Oil Storage Tank

City: Port St. Lucie State: Florida Company: **CPV**

Type of Tank: Vertical Fixed Roof Tank

Description: Nominal 975,000 gallon distillate oil storage tank

Tank Dimensions

Shell Height (ft): 45.00 Diameter (ft): 67.75 Liquid Height (ft): 36.15 Avg. Liquid Height (ft): 30.00 Volume (gallons): 975,000.00 Turnovers: 10.86 Net Throughput (gal/yr): 10,593,000.00 Ν

Is Tank Heated (y/n):

Paint Characteristics

Shell Color/Shade: Gray/Medium

Shell Condition: Good

Roof Color/Shade: Gray/Medium

Roof Condition: Good

Roof Characteristics

Type: Dome

Height (ft): 5.00 Radius (ft) (Dome Roof): 67.75

Breather Vent Settings

Vacuum Settings (psig): -0.03 Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Vero Beach, Florida (Avg Atmospheric Pressure = 14.75 psla)

TANKS 4.0 Emissions Report - Summary Format Liquid Contents of Storage Tank

			/ Liquid Surf. ratures (deg F)		Liquid Bulk Temp.	Vanor	Pressures (psia	· · - · · - ·	Vapor Mol.	Liquid Mass	Vepor Mass	Mal.	Basis for Vapor Pressure
Mixture/Component	Month	Avg.	Min.	Max.	(deg F)	Avg.	Min,	Max.	Weight	Fract.	Fract.	Weight	Calculations
Distillate fuel oil no. 2	Jan	74.75	66.07	B3.43	75.49	0.0104	0.0079	0.0136	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Feb	76.48	66.73	86.23	75.49	0.0110	0.0081	0.0148	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Mar	80.20	69.09 ,	91.31	75.49	0.0123	0.0087	0.0172	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Apr	83.37	71.04	95.69	75.49	0.0136	0.0093	0.0195	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	May	85.49	73.29	97.58	75.49	0.0144	0.0099	0.0207	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Jun	86.42	75.17	97.67	75.49	0.0149	0.0105	0.0208	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Jul	78.91	74.83	82.99	75.49	0.0118	0.0104	0.0134	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Aug	86.96	75.89	98.02	75.49	0.0151	0.0108	0.0209	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Sep	85.13	75.43	94.84	75.49	0.0143	0,0106	0.0190	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Oct	82.04	73.14	90.94	75.49	0.0130	0.0099	0.0170	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Nov	78.48	70.07	86.89	75.49	0.0117	0.0090	0.0151	130.0000			188.00	Option 5: A=12.101, B=8907
Distillate fuel oil no. 2	Dec	75.45	67.14	83.75	75.49	0.0106	0.0082	0.0137	130,0000			188.00	Option 5: A=12.101, B=8907

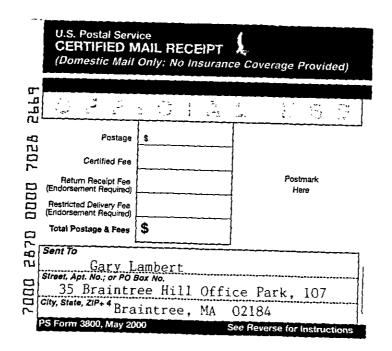
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TANKS 4.0 Emissions Report - Summary Format Individual Tank Emission Totals

Emissions Report for: January , February , March , April , May , June , July , August , September , October , November , December

		Losses(lbs)	
Components	Working Loss	Breathing Loss	Total Emissions
Distillate fuel oil no. 2	418.28	446.97	865.25

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly) B. Date of Delivery J. Blanc 10/9/ C. Signature X. L. Blanc Agent Addressee
Article Addressed to:	D. Is delivery address different from item 1? Yes If YES, enter delivery address below: No
Mr. Gary Lambert Executive Vice President CPV Cana, Ltd. 35 Braintree Hill Office Park Suite 107 Braintree, MA 02184	3. Service Type A Certified Mail Registered Registered Registered Registered Registered Registered Registered Registered Registered Registered
	4. Restricted Delivery? (Extra Fee)
2. Article Number (Copy from service label) 7000 2870 0000 7028 2669	
PS Form 3811, July 1999 Domestic Ret	urn Receipt 102595-99-M-1789





Department of Environmental Protection

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

David B. Struhs Secretary

October 2, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary Lambert
Executive Vice President
CPV Cana, Ltd.
35 Braintree Hill Office Park, Suite 107
Braintree, Massachusetts 02184

Re: DEP File No. 1110103-001-AC (PSD-FL-323)

Proposed Nominal 245 MW Combined Cycle Power Plant

Dear Mr. Lambert:

On September 5, 2001 the Department received your application and complete fee for an air construction permit for a nominal 245 megawatts (MW) combined cycle power plant in Port St. Lucie, St. Lucie County, Florida. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Proposed Emissions for Sulfuric Acid Mist are 7.62 TPY. This is above the PSD limit of 7 TPY. Please complete a BACT analysis for this pollutant.

Submit potential emissions for the fire pump and the diesel emergency generator as well as the diesel storage tank units. Although these units may be exempted from permitting (based on emissions and capacity), we need to include them in the construction permit.

What is the ammonia's concentration in the storage tank (i.e. < or > 20 percent)? Please refer to 40CFR 68, Chemical Accident Provisions.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/921-9519. Matters regarding modeling issues should be directed to Debra Galbraith (meteorologist) at 850/921-9537 and e-mail debra.galbraith@dep.state.fl.us. Matters regarding the technical information may be directed to Teresa Heron at 850/921-9529 and e-mail teresa.heron@dep.state.fl.us

Sincerely,

A. A. Linero, P.E. Administrator New Source Review Section

AAL/ch

cc: Gregg Worley, EPA John Bunyak, NPS Bill Thomas, SWD Scott Sumner, P.E., TRC



Department of Environmental Protection

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

September 7, 2001

David B. Struhs Secretary

Mr. Gregg Worley, Chief Air, Radiation Technology Branch Preconstruction/HAP Section U.S. EPA, Region 4 61 Forsyth Street Atlanta, Georgia 30303

RE: CPV Cana Power Generating Facility

St. Lucie County, Florida

DEP File No. 1110103-001-AC, PSD-FL-323

Dear Mr. Worley:

Enclosed for your review and comment is an application for a PSD source submitted by CPV Cana, Ltd. for the construction of an electrical power generating facility in St. Lucie County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact Teresa Heron, review engineer, at 850/921-9529.

Sincerely,

Al Linero, P.E.

Administrator

New Source Review Section

AAL/pa

Enclosure

Cc: Teresa Heron

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Department of **Environmental Protection**

leb Bush Governor

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

David B. Struhs Secretary

September 7, 2001

Mr. John Bunyak, Chief Policy, Planning & Permit Review Branch NPS - Air Quality Division Post Office Box 25287 Denver, Colorado 80225

RE: CPV Cana Power Generating Facility

St. Lucie County, Florida

DEP File No. 1110103-001-AC, PSD-FL-323

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for a PSD source submitted by CPV Cana, Ltd. for the construction of an electrical power generating facility in St. Lucie County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact Teresa Heron, review engineer, at 850/921-9529.

Patty Adams

Al Linero, P.E.

Administrator

New Source Review Section

AAL/pa

Enclosure

Cc: Teresa Heron