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ORLANDO UTILITIES COMMISSION

DER-BAQM

500 SOUTH ORANGE AVENUE • P. O. BOX 3193 • ORLANDO, FLORIDA 32802 • 407/423-9100

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

November 21, 1989

Mr. Bill Thomas  
Florida Department of  
Environmental Regulation  
Bureau of Air Regulation  
2600 Blairstone Road  
Tallahassee, FL 32399-2400

Re: PSD-FL-130

Dear Mr. Thomas:

We appreciate your continuing efforts in modifying our PSD construction permit for the four unit combustion turbine project at our Indian River Plant.

We would like to present the following comments on two specific conditions of the proposed modifications to the permit attached to Mr. Fancy's letter of October 26.

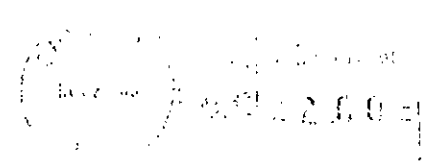
Specific Condition 7 needs to reflect the 20 lbs/hr/unit Total Particulates and PM<sub>10</sub> as described in the Technical Evaluation and Preliminary Determination for Permit Modification signed and sealed on October 26.

Specific Condition 17 appears to be a significant change from the previous language regarding when an operational permit application must be submitted. The original language in the third paragraph of Specific Condition 10 allowed us to apply for an operational permit 90 days prior to expiration of the construction permit, thus recognizing we could make application for all four operational permits at one time. We are concerned that the new language could be read to imply that an application for an operational permit must be sought within 45 days after performance testing of each combustion turbine and, therefore, places us in immediate non-compliance with CT-A and CT-B. We propose to retain the original language in the new format.



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- 2 -

November 21, 1989

Except for the above two comments, the new permit appears to be an improvement with regards to clarity and organization. Again, thank you for your cooperation.

Very truly yours,



J. S. Crall  
Director  
Environmental Division

JSC/cs

xc: W. H. Herrington  
F. F. Haddad  
K. P. Ksionek  
T. D. Slepow  
S. M. Day (B&V)

*copied: P. Laval  
C. Collins  
CHF/BT*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

4APT-APB-cdw

NOV 15 1989

Mr. C.H. Fancy, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

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NOV 20 1989  
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RE: Orlando Utilities Commission, Indian River Plant (PSD-FL-130)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft permits for the above referenced facility's permit modification request, dated October 26, 1989.

We have reviewed the request to alter the particulate emission limits for the turbines when firing fuel oil and concur with your decision.

Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact Mr. Gregg Worley of my staff at (404) 347-2864.

Sincerely yours,

*Wayne Johnson*

Bruce P. Miller, Chief  
Air Programs Branch  
Air, Pesticides, and Toxics  
Management Division

cc: P. Raval  
C/F/BT