

**HOPPING GREEN SAMS & SMITH**

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

FAX (904) 425-3415

JAMES S. ALVES  
BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
ELIZABETH C. BOWMAN  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
RALPH A. DEMEO  
THOMAS M. DEROSE  
WILLIAM H. GREEN  
WADE L. HOPPING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
DAVID L. POWELL  
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GARY V. PERKO  
KAREN M. PETERSON  
MICHAEL P. PETROVICH  
DOUGLAS S. ROBERTS  
LISA K. RUSHTON  
R. SCOTT RUTH  
JULIE R. STEINMEYER

OF COUNSEL  
CARLOS ALVAREZ  
W. ROBERT FOKES

**MEMORANDUM**

**RECEIVED**  
AUG 2 1995

Bureau of  
Air Regulation

**TO: Syed Arif**

**FROM: Doug Roberts** *DR*

**RE: Cedar Bay Cogeneration Project Final Order Modifying Site Certification**

**DATE: August 2, 1995**

=====  
Attached is a copy of the final signed order modifying the site certification for the Cedar Bay Cogeneration Project. You indicated that upon your receipt of this order, the Bureau would proceed to issue the separate PSD permit amendment for the Project to address these issues.

Your attention to this matter is appreciated. I would ask you to call me when the final permit amendment is issued. In the interim, should you have any questions, please do not hesitate to contact me.

Attachment

cc: Mark Carney, US Gen. Co.  
Steve Herman, US Gen. Co.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN RE: SITE CERTIFICATION	)	
CEDAR BAY COGENERATION PROJECT	)	OGC NO. 88-1089
CEDAR BAY COGENERATION, INC.	)	CERTIFICATION NO. PA 88-24B
U.S. GENERATING COMPANY	)	
<hr/>		

FINAL ORDER MODIFYING CONDITIONS OF CERTIFICATION

On February 18, 1991, the Governor and Cabinet, acting as the Siting Board, issued a final order approving certification of the Cedar Bay Cogeneration Project. That certification ~~order approved the construction and operation of a fluidized bed, coal fired cogeneration power plant and associated facilities to be located in Duval County, Florida.~~ The facility is operated by Cedar Bay Cogeneration, Inc. (CBC) a subsidiary of U.S. Generating Company.

On October 31, 1994, CBC filed a request to modify the conditions of certification pursuant to section 403.516(l)(b), Florida Statutes (F.S.). CBC requested relief from conditions controlling emissions from the material handling system and the storage, handling, shipping disposal and reuse of solid wastes produced by the combustion of coal.

Copies of CBC's request were distributed to all parties to the certification proceeding and made available for public review. On March 24, 1995, the Department published a Notice of Intent to Issue the Proposed Modification in the Florida Administrative Weekly. Copies of the intent to issue were sent to all parties to the original proceeding. As of March 23, 1995, all of the parties to the original proceeding had received copies of the intent to issue. The notice specified that a hearing would be held if a party to the original certification hearing objects within 45 days from receipt of the proposed modification or if a person whose substantial interests will be affected by the proposed modification objects in writing within 30 days after issuance of the public notice. No timely objection to the proposed modifications that are set forth below was received by the Department. The other matters that were addressed in the original modification request and in the Department's proposed order of modification, but that are not further addressed herein, will be addressed in separate orders at a later date.

Accordingly, in the absence of any timely objection, IT IS ORDERED :

The proposed modifications to the Conditions of Certification relating to material handling emissions sources and solid waste disposal at the Cedar Bay Cogeneration Facility are hereby APPROVED. Pursuant to section 403.516(1)(b), F.S., the Department hereby modifies the conditions of certification for the Cedar Bay Cogeneration Project as follows:

II. B. 4. Material handling sources shall be regulated as follows:

a. The material handling and treatment area sources with either fabric filter or baghouse controls are as follows:

Coal Crusher Building

Coal Silo Conveyor

Limestone Pulverizers(2)/Conveyors

Limestone Storage Bins (2)

Bed Ash Hopper

Bed Ash Separator

Bed Ash Silo Vent

Fly Ash Silo Vent

Fly Ash Separators (2)

Bed Ash Receiver Bin

Fly Ash Receiver Bin

Pellet Vibratory Screen System

Pelletizing Ash-Recycle Tank

Pelletizing Recycle Hopper

Cured Pellet Screening Recycle Conveyor System

Pellet Recycle Conveyor

Pelletizing Rail Loadout

The emissions from the above listed sources are subject to the particulate emission

limitation requirement of 0.003 gr/dscf (applicant-requested limitation which is more stringent than what is allowed by Rule 62 17-296.711, F.A.C.). Since these sources are RACT standard type then a one-time verification test on each source shall be required for PM mass emissions to demonstrate that the baghouse control systems can achieve the 0.003 gr/dscf. The performance tests shall be conducted using EPA Method 5 pursuant to Rule 62 17-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992+ version).

b. The PM emissions from the following process, equipment, and/or facility in the material handling and treatment area sources shall be controlled ~~using wet suppression/removal techniques as follows:~~

<u>Coal Car Unloading</u>	
Ash Pellet Hydrator:	<u>Scrubber</u>
Ash Pellet Curing Silos:	<u>Scrubber</u>
Ash Pelletizing Pan:	<u>Scrubber</u>

The above listed sources are subject to a visible emission (VE) and a particulate matter (PM) emission limitation requirement of 5 percent opacity and 0.01 gr/dscf (applicant-requested limitation, which is more stringent than what is allowed by rule), respectively, in accordance with Rule 62 17-296.711, F.A.C. Initial and subsequent compliance tests shall be conducted for VE and PM using EPA Methods 9 and 5, respectively, in accordance with Rule 62 17-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992+ version).

c. Fugitive emissions from the following material handling and transport sources shall be controlled as follows:

<u>Coal Car Unloading:</u>	<u>Wet Suppression using continuous watersprays during unloading.</u>
----------------------------	---

Dry Ash Rail Car Loadout:

Using closed or covered containers under negative air pressure during ash loadout; and using water sprays prior to removal of rail car loadout cap when loading open rail cars.

The above listed sources are subject to a visible emissions (VE) limitation requirement of five percent (5%) opacity in accordance with Rule 62-296.711, F.A.C. Initial and subsequent compliance tests shall be conducted for VE using EPA Method 9 or other FDEP approved methods in accordance with Rule 62-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version). Initial visible emission testing shall be conducted within 90 days after final DEP approval of these facilities or within 90 days after completion of construction of the source, whichever occurs last. Ash shipped in open rail cars will either be pelletized or be sprayed with water to create a crust on the top layer of non-pelletized ash. Removal of bottom and fly ash from the Project site by any means other than by rail shall require the prior approval of DEP and RESD of the method(s) of fugitive emissions control.

7. The maximum emissions from each of the Limestone Pulverizers/Conveyors (including limestone dryer) limestone dryers shall not exceed the following: while using oil shall not exceed the following (based on AP 42 factor, Table 1, 3-1, Industrial Distillate, 10/86)

Estimated Limitations

<u>Pollutant</u>	<u>lbs/hr.</u>	<u>TPY</u>	<u>TPY for 2 pulverizers/conveyors</u>	<u>dryers</u>
PM/PM10	<u>1.26*</u> <del>0.24</del>	<u>1.68</u> <del>0.32</del>	<u>3.36</u>	<u>0.64</u>
SO2	0.85	1.15	2.3	
CO	0.60	0.81	1.62	
NOx	2.40	3.25	6.5	
VOC	0.05	0.06	0.12	

The emissions for SO2, CO, NOx, and VOC are based on AP-42 factors, Table 1, 3-1, Industrial Distillate, 10/86).

\* This reflects the emission limitation for the limestone pulverizers/conveyors in Condition II.B.4.a. and limits the emission for the Limestone Pulverizers/Conveyors and the dryer.

Visible emissions from the limestone pulverizers/conveyors ~~dryers~~ shall not exceed 5% opacity.

IX. SOLID WASTE STORAGE AND DISPOSAL

CBCP shall be responsible for arranging for the proper storage, handling, disposal, or reuse of any solid waste generated by the CBCP facility. Solid waste produced by the operation of the CBCP facility shall be removed from the site and disposed of in a permitted disposal facility, with the exception of bottom ash and fly ash. Bottom ash and fly ash ~~may will~~ be pelletized, or made into aggregate form, and shall be either shipped by rail back to the mine, or to a permitted disposal area outside Duval County. ~~utilizing the trains to deliver the coal, or sold as an additive to concrete, or utilized by~~ Ash may be shipped offsite to companies specializing in the marketing and utilization of combustion by-products. Fugitive emissions from storage and handling of ash materials will be controlled in accordance with these conditions and Department

rules. Open rail cars used to ship dry ash will be sealed to prevent leaks of ash during transport. There shall be no outside storage of CFB ash prior to pelletization or load out of ash to sealed rail cars for removal from the site. The bottom ash and fly ash shall not be disposed of in a landfill within Duval County. If the CBCP decides to dispose of the bottom ash or fly ash by other than returning it to the mine site or a permitted disposal site outside Duval county, they shall notify RESD and DEP. Subsequent changes to the ash pelletization system which result in new or modified emissions sources or discharges shall require submittal of a request for modification of this certification, in accordance with section 403.516,F.S.

The remainder of Condition IX remains the same.

Any party to this Order has the right to seek judicial review of the Order pursuant to section 120.68, Florida Statutes, by the filing of Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Blvd., Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date that the Final Order is filed with the Department of Environmental Protection.

DONE AND ENTERED this 1<sup>st</sup> day of Aug, 1995 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

**FILING AND ACKNOWLEDGEMENT**  
FILED, on this date, pursuant to S120.52  
Florida Statutes, with the designated  
Department Clerk, receipt of which  
is hereby acknowledged.

Rebecca Brown 8-1-95  
Clerk Date

Virginia B. Wetherell  
VIRGINIA B. WETHERELL  
Secretary  
Marjory Stoneman Douglas Bldg.  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
(904) 488-4805

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that a true and correct copy of the foregoing document has been sent by U.S. Mail to the following listed persons:

Doug Roberts, Esq.  
Hopping Green Sams & Smith  
P O Box 6526  
Tallahassee FL 32314

Gregory K. Radlinski, Esq.  
City of Jacksonville  
600 City Hall  
220 E Bay St  
Jacksonville FL 32202

Terry Cole, Esq.  
Scott Shirley, Esq.  
Oertel Hoffman Fernandez & Cole  
P O Box 6507  
Tallahassee FL 32314-6507

Nancy B. Barnard, Esq.  
St. Johns River Water  
Management District  
P.O. Box 1429  
Palatka, FL 32178-1429

Jim Antista, General Counsel  
Florida Game & Fresh Water  
Fish Commission  
620 S Meridian Rd  
Tallahassee FL 32399-1600

Rob Vandiver, General Counsel  
Mike Palecki, Esquire  
Bureau of Electric & Gas  
Florida Public Service Comm.  
101 E Gaines St  
Tallahassee FL 32399-0850

David Russ, Esq.  
Department of Community Affairs  
2740 Centerview Dr  
Tallahassee FL 32399-2100

James A. Heard, Esq.  
4741 Atlantic Blvd., Ste. C  
Jacksonville FL 32207

Earl M. Barker, Esq.  
Slott & Barker  
334 East Duval St  
Jacksonville, FL 32302

Lisa B. Cooper, Esq.  
Margol & Pennington  
76 Laura St  
Jacksonville FL 32202

Lawrence N. Curtin, Esq.  
Holland & Knight  
P O Drawer 810  
Tallahassee FL 32302

this 1st day of August, 1995.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
CHARLES T. "CHIP" COLLETTE  
Assistant General Counsel

Twin Towers Office Bldg.  
2600 Blair Stone Rd.  
Tallahassee FL 32399-2400  
904/488-9730



**HOPPING GREEN SAMS & SMITH**

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

FAX (904) 425-3415

July 18, 1995

KRISTIN M. CONROY  
CONNIE C. DURRENCE  
JONATHAN S. FOX  
JAMES C. GOODLETT  
GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
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GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

Mr. A.A. Linero  
Bureau of Air Regulation  
Department of Environmental Protection  
Magnolia Plaza  
Tallahassee, FL 32399

Re: Cedar Bay Cogeneration Project; PSD-FL-137(B)  
Comments on Proposed PSD Permit Amendment

RECEIVED

JUL 20 1995

Bureau of  
Air Regulation

Dear Mr. Linero:

On behalf of Cedar Bay Generating Co. (CBGC), I wish to offer the following comments on the proposed amended permit issued on June 30, 1995, for the Cedar Bay Cogeneration Project. Most of the comments are shown as hand-written additions or changes to the attached copy of the draft permit amendment.

Consistent with CBGC's permit amendment request, the words "fly-ash receiver bin" should be added to the list of sources in Condition II.B.4.a. This source appears to have been omitted as an oversight in the preparation of this document. We have also indicated using the plural form of "pulverizer" at several places in the permit, specifically Condition II.B.4.a. and Condition 7. This does not represent any change in the Project since submittal of the permit amendment request but instead clarifies that there are multiple pulverizers already at the site. It does not cause any increase in emissions or other changes to the project.

We appreciate the opportunity to provide these comments. Should you or your staff have any questions concerning these items, please do not hesitate to contact either Mark Carney at the U.S. Generating Co. (301-718-6899) or me.

Sincerely,



Douglas S. Roberts

DSR/gs



cc: Syed Arif, DEP BAR  
Hamilton S. Oven, DEP OSC  
Chip Collette, DEP OGC  
Mark Carney, U.S. Generating Co.  
Sandy Hartman, U.S. Generating Co.  
Frank Stallwood, Cedar Bay Plant  
Tim Cotner, Cedar Bay Plant



# Department of Environmental Protection

# DRAFT

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July XX, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kent L. Fickett  
Cedar Bay Generating Company, L.P.  
7500 Old Georgetown Road *13TH FLOOR*  
Bethesda, Maryland 20814

Dear Mr. Fickett:

RE: Request for Permit Amendment  
Cedar Bay Cogeneration Project  
PSD-FL-137(B); Duval County

The Department received your request of May 12, 1995, to make minor amendments to the material handling systems for ash pelletization, coal unloading, dry ash loading and removal, and limestone pulverizer/conveyor for the above referenced PSD permit. The permit's specific conditions are amended as shown:

II. B. 4. Material handling sources shall be regulated as follows:

a. The material handling and treatment area sources with either fabric filter or baghouse controls are as follows:

- Coal Crusher Building
- Coal Silo Conveyor *S(2)*
- Limestone Pulverizer/Conveyors
- Limestone Storage Bins *(2)*
- Bed Ash Hopper
- Bed Ash Separator
- Bed Ash Silo Vent
- Fly Ash Silo Vent
- Fly Ash Separators *(2)*
- Bed Ash Receiver Bin *< Fly Ash Receiver Bin*
- Pellet Vibratory Screen System
- Pelletizing-Ash Recycle Tank
- Pelletizing-Recycle-Hopper
- Cured Pellet Screening Recycle Conveyor System
- Pellet Recycle Conveyor
- Pelletizing Rail Loadout

↑  
STRIKE THRU  
TEXT

# DRAFT

Mr. Kent Fickett  
July XX, 1995  
Page Two

The emissions from the above listed sources are subject to the particulate emission limitation requirement of 0.003 gr/dscf (applicant-requested limitation which is more stringent than what is allowed by Rule 62 17-296.711, F.A.C.). Since these sources are RACT standard type then a one-time verification test on each source shall be required for PM mass emissions to demonstrate that the baghouse control systems can achieve the 0.003 gr/dscf. The performance tests shall be conducted using EPA Method 5 pursuant to Rule 62 17-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version).

- b. The PM emissions from the following process equipment, and/or facility equipment, in the material handling and treatment area sources shall be controlled using-wet suppression/removal-techniques as follows:

<u>Coal-Car-Unloading</u>	
Ash Pellet Hydrator:	<u>Scrubber</u>
Ash Pellet Curing Silos:	<u>Scrubber</u>
Ash Pelletizing Pan:	<u>Scrubber</u>

The above listed sources are subject to a visible emissions (VE) and a particulate matter (PM) emissions limitation requirement of 5 percent % opacity and 0.01 gr/dscf (applicant requested limitation, which is more stringent than what is allowed by rule), respectively, in accordance with Rule 62 17-296.711, F.A.C. Initial and subsequent compliance tests shall be conducted for VE and PM emissions using EPA Methods 9 and 5, respectively, in accordance with Rule 62 17-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version).

- c. Fugitive emissions from the following material handling and transport sources shall be controlled as follows:

<u>Coal Car Unloading:</u>	<u>Wet Suppression using continuous water sprays during unloading.</u>
<u>Dry Ash Rail Car Loadout:</u>	<u>Using closed or covered containers under negative air pressures during ash loadout; and using water sprays prior to removal of rail car loadout cap when loading open rail cars.</u>

DRAFT

Mr. Kent Fickett  
July XX, 1995  
Page Three

The above listed sources are subject to a visible emission (VE) limitation requirement of five percent (5%) opacity in accordance with Rule 62-296.711, F.A.C. Initial and subsequent compliance tests shall be conducted for VE using EPA Method 9 or other FDEP approved methods in accordance with Rule 62-297, F.A.C., and 40 CFR 60, Appendix A (July, 1992 version). Initial visible emission testing shall be conducted within 90 days after final DEP approval of these facilities or within 90 days after completion of construction of the source, whichever occurs last. Ash shipped in open rail cars will either be pelletized or be sprayed with water to create a crust on the top layer of non-pelletized ash. Removal of bottom and fly ash from the Project site by any means other than by rail shall require the prior approval of DEP and RESD of the method(s) of fugitive emissions control.

7. The maximum emissions from each of the Limestone Pulverizer/Conveyors (including limestone dryer) limestone-dryers shall not exceed the following: while-using-oil-shall-not-exceed the following (based on AP-42 factor, Table 1, 3-1, Industrial Distillate, 10/86)

Estimated Limitations

Pollutant	lbs/hr	TPY	TPY for 2 Pulverizer <sup>S</sup> Conveyors Dryers
PM/PM <sub>10</sub>	1.26*	0-24	3.36 0-64
SO <sub>2</sub>	0.85	1.15	2.3
CO	0.60	0.81	1.62
NO <sub>x</sub>	2.40	3.25	6.5
VOC	0.05	0.06	0.12

The emissions for SO<sub>2</sub>, CO, NO<sub>x</sub>, and VOC are based on AP-42 factor, Table 1, 3-1, Industrial Distillate, 10/86.

\* This reflects the emission limitation for the limestone pulverizer<sup>S</sup>/conveyor<sup>S</sup> in Condition II.B.4.a. and limits the emission for the Limestone Pulverizer<sup>S</sup>/Conveyor<sup>S</sup> and the dryer.

Visible emissions from the limestone pulverizer<sup>S</sup>/conveyors<sup>S</sup> dryers shall not exceed 5% opacity.

# DRAFT

Mr. Kent Fickett  
July XX, 1995  
Page Four

A copy of this letter shall be attached to the above mentioned permit, No. PSD-FL-137(B), and shall become a part of the permit.

Sincerely,

Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sa/t

cc: C. Kirts, NED  
S. Pace, RESD  
H. Oven, PPS  
J. Harper, EPA  
J. Bunyak, NPS  
D. Roberts, HGS&S

**REGULATORY & ENVIRONMENTAL  
SERVICES DEPARTMENT**  
Air Quality Division

June 5, 1995

RECEIVED  
JUN 8 1995

Bureau of  
Air Regulation



Mr. Hamilton S. Oven, P.E., Administrator  
Office of Siting Coordination  
Department of Environmental Protection -  
3900 Commonwealth Boulevard, Room 953  
Tallahassee, Florida 32399-3000

**RE: Cedar Bay Cogeneration Project  
Request for Modification of Site Certification, PA 88-24B  
Request for Amendment of PSD Permit, PSD-FL-137A**

Dear Mr. Oven:

The Air Quality Division (AQD) has reviewed the subject modification and amendment requests.

The proposed modified site certification conditions submitted by Mr. Douglas S. Roberts, Esquire, of Hopping, Green, Sams & Smith, dated May 26, 1995, have addressed the concerns of the AQD. However, in order to provide a consistent source name throughout Condition II.B.7., AQD suggests the sentence "Visible emissions from the dryers shall not exceed 5% opacity." be changed to "Visible emissions from the limestone pulverizer/conveyors shall not exceed 5% opacity."

By copy of this letter to Mr. Syed Arif, DEP/BAR, AQD has no objections to the use of these proposed conditions in amending the PSD permit with the exception noted above and Condition IX. Solid Waste Storage and Disposal - not required in the PSD permit. Also, AQD would appreciate DEP establishing APIS point numbers for the bed ash receiver, fly ash receiver, pelletizing rail loadout and the dry ash rail car loadout.

We appreciate the opportunity to participate in this review. If there are any questions, please contact me.

Very truly yours,

Robert S. Pace, P.E.  
Division Chief

RSP/RLR/sa

c: Mrs. Barbara Broward  
Mr. Chris Kirts, P.E., FDEP/N.E. District  
Mr. Syed Arif, DEP/BAR  
Mr. Kevin Grant, CBGC  
Mr. Mark Carney, U.S. Generating Company  
Mr. John Keith, Earth Tech  
Mr. Douglas Roberts, Esquire, Hopping, Green, Sams & Smith  
AQD File 1065 A



421 West Church Street - Suite 412  
Jacksonville, Florida 32202-4111

Area Code 904/630-3484