

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 30, 1995

**CERTIFIED MAIL- RETURN RECEIPT REQUESTED**

Mr. Thomas M. Moses  
District Administrator  
Reedy Creek Improvement District  
Post Office Box 10170  
Lake Buena Vista, Florida 32830-0170

Dear Mr. Moses:

RE: Reedy Creek Improvement District (RCID)  
GE Gas Turbine with Heat Recovery Steam Generator  
PSD-FL-123, AC48-137740

The Department is in receipt of your letter dated February 1, 1995, requesting revisions and deletions of several conditions of the above mentioned permit. The Department considered your request and agreed to revise your permit as proposed in your letter.

The revisions of the specific conditions of the permit are finalized as follows:

**SPECIFIC CONDITION No.**

*9 see original permit*

**FROM:**

Initial and annual compliance testing shall be conducted with the fuels used in the preceding 12 month period using:

1. EPA Method 20 for NOx and SO2
2. EPA Method 10 for CO
3. EPA Method 5 for PM
4. EPA Method 9 for VE

Other DER approved methods may be used for compliance testing only after prior Department approval.

**TO:**

Pursuant to Rule 62-297.340, F.A.C., Frequency of Compliance Tests, initial and annual compliance testing shall be conducted with the fuels used in the preceding 12 month period using:

Mr. Thomas M. Moses  
March 30, 1995  
Page Two

1. EPA Method 20 for NOx and SO2
2. EPA Method 10 for CO
3. EPA Method 9 for VE

Other DEP approved methods may be used for compliance testing only after prior Department approval.

**SPECIFIC CONDITION No.7**

**FROM:**

The Black Start Cumming No. 2 oil fired emergency generator, when fired on a normal basis to maintain a state of readiness shall not be operated beyond the 10 minutes/week check out period.

For inventory purposes only, the emergency generator's expected emissions are listed below:

POLLUTANT	lb/yr
NOx	232
CO	36
VOC	9
PM	8
SO2	30

**TO:**

Pursuant to Rule 62-210.300(3)(u) F.A.C., this condition will be deleted.

It should be noted that pursuant to Rule 62-210.300(3), F.A.C., this source, although exempt from permitting requirements of Chapter 62-210 and Chapter 62-4, F.A.C., is subject to any applicable emission standard specified in Rule 62-252.300, and 62-296, F.A.C., other than Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) requirements.

Furthermore, pursuant to Rule 62-213.420(3)(m), F.A.C., this source, although currently exempt from permitting, is required to be included in the Title V operation permit application.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the

Mr. Thomas M. Moses  
March 30, 1995  
Page Three

information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

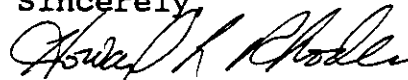
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right

Mr. Thomas M. Moses  
March 30, 1995  
Page Four

such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

A copy of this letter shall be filed with the construction permit, Nos. AC48-137740 and PSD-FL-123, and shall become a part of the permit.

Sincerely,



Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/th/t

Enclosure:

Mr. T.M. Moses' letter dated February 1, 1995

cc: Charles Collins  
Jewell Harper, EPA

Fold at line over top of envelope to line

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Thomas M. Moses Dist. Admin  
 Reedy Creek Improve. District  
 P O BOX 10170  
 Lake Buena Vista, FL  
 32830-0170

4a. Article Number  
 2 311 902 934

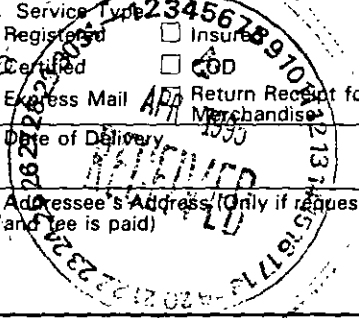
4b. Service Type 2345678910  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 APR 13 1993

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)



Thank you for using Return Receipt Service.

2 311 902 934



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, March 1993


Name Thomas Moses	
Street and No. Reedy Creek	
P.O. Box and ZIP Code Lake B.V., FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date PSD-FI-123 A448-137740	

3-31-95

Memorandum

Florida Department of  
**Environmental Protection**

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TO: Howard L. Rhodes  
FROM: Clair Fancy   
DATE: March 29, 1995  
SUBJECT: Reedy Creek Improvement District (RCID)  
Amendment of Permit No. AC 48-137740, PSD-FL-123  
and Construction Permit Nos. AC48-105243 &  
AC48-106650

Attached for your approval and signature are two letters to amend the referenced permits.

There will be no change in the intent of the previously issued permits, nor will it result in an increase of emissions.

CHF/th/t

attachment

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Thomas M. Moses  
 Reedy Creek Improv. Dist  
 Utilities Division  
 P.O. BOX 10170  
 Lake Buena Vista, FL  
 32830-0170

4a. Article Number  
 Z 751 860 027

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 2-15-95

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

Z 751 860 027

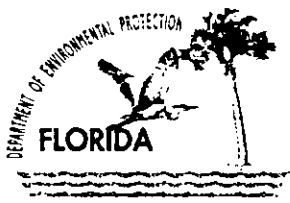


**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, March 1993

Sender Thomas Moses	
Street and No. Reedy Creek Util	
P.O. State and Zip Code Lake Buena Vista, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 2-15-95	
PM # AC48-137750 PSD-FI-123	
PM #'s AC 48-105243 AC 48-106650	



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 15, 1995

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Thomas M. Moses  
District Administrator  
Reedy Creek Improvement District  
Utilities Division  
P. O. Box 10170  
Lake Buena Vista, Florida 32830-0170

Dear Mr. Moses:

RE: Reedy Creek Improvement District  
Permit No. AC48-137750, PSD-FL-123  
Permit Nos. AC48-105243 and AC48-106650

The Bureau of Air Regulation has reviewed the above referenced requests and determined that they will require permit amendments as well as a processing fee of \$500 (\$250 for each request). As soon as the fee is received, we will begin processing your requests. If you have any questions, please call Patty Adams at (904) 488-1344.

Sincerely,

*Patricia G. Adams*  
for C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

cc: Teresa Heron





**REEDY CREEK  
IMPROVEMENT DISTRICT**

P.O. BOX 10170 LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 828-2241

0102056

March 7, 1995

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

RE: Reedy Creek Improvement District  
Permit No. AC48-137750, PSD-FL-123  
Permit Nos. AC48-105243 and AC48-106650

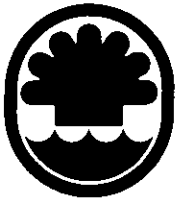
Dear Mr. Fancy:

In accordance with your letter dated February 15, 1995, Reedy Creek Improvement District herewith provides a check in the amount of \$500.00 for the processing fee associated with requested amendments of the above referenced permits. Please direct any questions to Elaine Potusky at (407) 824-6113.

Sincerely,

Thomas M. Moses

TM/EP/skl



**REEDY CREEK  
IMPROVEMENT DISTRICT**

PO. BOX 10170 LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 828-2241

*al*  
*et al*

April 17, 1995

**RECEIVED**

**APR 18 1995**

Division of Air  
Resources Management

Mr. Howard L. Rhodes  
Director  
Division of Air Resources Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Reedy Creek Improvement District  
GE Gas Turbine with Heat Recovery Steam Generator  
PSD-FL-123, AC48-137740

Dear Mr. Rhodes:

Reedy Creek Improvement District (RCID) is in receipt of your letter dated March 30, 1995 in which the Department agrees to RCID's proposed revisions of the above referenced permit. RCID respectfully requests the Department's deletion of the reference (in its amended Specific Condition No. 7) that the Black Start Cummings No. 2 oil fired emergency generator is subject to any applicable emission standard specified in Rule 62-252.300 since this rule applies to Gasoline Dispensing Facilities - Stage I Vapor Recovery.

Please contact Elaine Potusky with any questions or concerns you may have regarding this request.

Sincerely,

Thomas M. Moses  
District Administrator

cc: Chuck Collins, Central District  
Office of General Counsel  
Jewell Harper, USEPA



**REEDY CREEK  
IMPROVEMENT DISTRICT**

PO. BOX 10170 LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 828-2241

**RECEIVED**  
FEB 7 1995

February 1, 1995

Mr. C.H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Bureau of  
Air Regulation

RE: Reedy Creek Improvement District  
GE Gas Turbine with Heat Recovery Steam Generator  
PSD-FL-123, AC48-137740

Dear Mr. Fancy:

On March 3, 1988, the Department issued Construction Permit AC48-137740 to Reedy Creek Improvement District (RCID) authorizing construction and operation of a GE gas turbine (GT) and heat recovery steam generator system (HRSG). The GT is fired primarily with natural gas with back-up distillate fuel oil. In accordance with Specific Condition No. 2, use of distillate fuel oil in the GT is limited to no more than 14 days per year (336 hours per year).

Specific Condition No. 9 of Construction Permit AC48-137740 requires initial and annual compliance testing for particulate matter (PM) in addition to visible emissions (VE). Regulation 62-297.340(e), F.A.C. states that annual compliance tests for PM emissions shall not be required for any fuel burning source that does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours per year. Because liquid fuel will not be burned in the GT for more than a total of 400 hours per year, RCID requests that Construction Permit AC48-137740 be revised to delete the requirement for PM testing consistent with 62-297.340(e), F.A.C.

Specific Condition No. 7 contains requirements pertinent to the "Black Start" Cummins oil-fired emergency generator. Regulation 62-210.300(3)(u), F.A.C. exempts emergency diesel generators, heating units and general purpose diesel engines operating no more than 400 hours per year from Department permit requirements. Because the "Black Start" generator operates no more than 400 hours per year, RCID requests that Construction Permit AC48-137740 be revised to delete Specific Condition No. 7 in accordance with 62-210.300(3)(u), F.A.C.

Your expeditious response to these permit revision requests is appreciated. Please contact Ed Godwin at (407) 824-4943 if you have any questions.

Sincerely,

Thomas M Moses  
District Administrator

cc: Mr. Charles Collins, P.E.  
Central District