



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 9, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John P. Jones
President
Orlando CoGen (I), Inc.
Orlando CoGen Limited, L.P.
7201 Hamilton Boulevard
Allentown, PA 18195-1501

Dear Mr. Jones:

RE: Request for Construction Permit Amendments
AC 48-206720(A)/PSD-FL-184(A)

The Department has considered Mr. Kennard F. Kosky's request for amendments of the construction permit, referenced above, as outlined in the December 12, 1994 meeting with the Department. Each request will be addressed and the Department's response (R) and any changes will follow:

o Specific Condition 7.b.: Requested that EPA Method 17 be allowed for testing for particulate matter (PM).

R: The request is acceptable and the following will be changed:

FROM: EPA Method 5 for PM.

TO: EPA Method 5 or 17 for PM (initial only, unless opacity >10%).

o Specific Condition 8.: If EPA Method 17 is approved as a testing option in Specific Condition 7.b., then the request is that it also be included as a testing option in this condition.

R: The request is acceptable and the following will be changed:

FROM: EPA Method 5 must be used to determine the initial compliance status of this unit. Thereafter, the opacity emissions test may be used unless 10% opacity is exceeded.

TO: EPA Method 5 or 17 must be used to determine the initial compliance status of this unit. Thereafter, the opacity emissions test may be used unless 10% opacity is exceeded.

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o Specific Condition 10.: Requested that the word "proposed", referring to the NO_x standard, be changed to "NSPS".

R: The request is acceptable and the following will be changed:

FROM:

During performance tests, to determine compliance with the proposed NO_x standard, measured NO_x emission at 15 percent oxygen shall be adjusted to ISO ambient atmospheric conditions by the following equation in accordance with 40 CFR 60.335(c)(1):

$$NO_x = (NO_{xO}) (P_r/P_o)^{0.5} e^{19(H_o - 0.00633)} (288^\circ K/T_a)^{1.53}$$

where:

NO_x = Emission rate of NO_x at 15 percent O₂ and ISO standard ambient conditions, volume percent.

NO_{xO} = Observed NO_x emission at 15 percent oxygen, ppmv.

P_r = Reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere) ambient pressure, mm Hg.

P_o = Measured combustor inlet absolute pressure at test ambient pressure, mm Hg.

H_o = Observed humidity of ambient air at test, g H₂O/g air.

e = Transcendental constant (2.718).

T_a = Temperature of ambient air at test, °K.

TO:

During performance tests, to determine compliance with the **NSPS** NO_x standard, **the** measured NO_x emission at 15 percent oxygen shall be adjusted to ISO ambient atmospheric conditions by the following equation in accordance with 40 CFR 60.335(c)(1):

$$NO_x = (NO_{xO}) (P_r/P_o)^{0.5} e^{19(H_o - 0.00633)} (288^\circ K/T_a)^{1.53}$$

where:

NO_x = Emission rate of NO_x at 15 percent O₂ and ISO standard ambient conditions, volume percent.

NO_{xO} = Observed NO_x emission at 15 percent oxygen, ppmv.

P_r = Reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere) ambient pressure, mm Hg.

P_o = Measured combustor inlet absolute pressure at test ambient pressure, mm Hg.

H_o = Observed humidity of ambient air at test, g H₂O/g air.

e = Transcendental constant (2.718).

T_a = Temperature of ambient air at test, °K.

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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 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 permit applicant 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 publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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 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 intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a

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waiver of any right 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 must be attached to the construction permit, No. AC 48-206720(A)/PSD-FL-184(A), and shall become a part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/SA/bjb

cc: C. Collins, CD
D. Nester, OCEPD
J. Harper, EPA
J. Bunyak, NPS
T. Hess, Orlando CoGen (I), Inc.
K. Kosky, P.E., KBN

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 2/9/95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is
hereby acknowledged.



2/9/95

Clerk

Date

Z 392 940 715



Receipt for Certified Mail

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

PS Form 3800, March 1993

Sent to	
Mr. John P. Jones	
Street and No.	
7201 Hamilton Boulevard	
P.O., State and ZIP Code	
Allentown, PA 18195-1501	
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	
Mailed: 2/9/95	
AC 48-206720(A)/PSD-FL-184(A)	

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:

Mr. John P. Jones
President
Orlando CoGen (I), Inc.
Orlando CoGen Limited, L.P.
7201 Hamilton Boulevard
Allentown, PA 18195-1501

5. Signature (Addressee)

6. Signature (Agent)

4a. Article Number
Z 392 940 715

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


7. Date of Delivery
FEB 13 1995

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

Thank you for using Return Receipt Service.

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy 
DATE: February 8, 1995
SUBJECT: Construction Permit Amendments
Orlando CoGen (I), Inc.
AC 48-206720(A)/PSD-FL-184(A)
Orange County

Attached for your approval and signature are amendments to a permit for Orlando CoGen (I), Inc., which is a natural gas fired cogeneration facility. The amendments will allow an alternate testing method for particulate matter (PM), establish the frequency of the PM tests, and clarify the NOx standard ("proposed" to "NSPS"). This action is not controversial.

I recommend your approval and signature.

CF/SA/rbm

Attachment