

Environmental and Energy Systems
Air Products and Chemicals, Inc.
7201 Hamilton Boulevard
Allentown, PA 18195-1501
Telephone (610) 481-4911



December 21, 1995

Mr. John C. Brown (MS 5505)
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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BUREAU OF
AIR REGULATION

RE: Acid Rain Phase II Permit Applications
Orlando CoGen Limited, L.P.

Dear Mr. Brown,

This letter is to clarify the Acid Rain Program Phase II permit application requirements for the Orlando CoGen Limited, L.P., facility (OCL). OCL received your November 30, 1995 letter requesting a permit application no later than January 1, 1996.

Under Chapter 62-214.200 (41) of the F.A.C. a new unit is defined as:

“a fossil fuel-fired combustion device that commences commercial operation on or after November 15, 1990, including any such unit that serves a generator with a nameplate capacity, as defined at 40 CFR 72.2, hereby incorporated by reference, or 25 megawatts-electrical (MWe) or less or that is a simple combustion turbine.”

OCL is a new unit under this definition. OCL commenced commercial operation on September 25, 1993.

Under Chapter 62-214.320 (1) (b) of the F.A.C. the Phase II permit application is due to the department “at least 24 months before the later of January 1, 2000, or the date on which the unit commences operation.” Therefore the deadline for OCL is January 1, 1998.

Based on these sections of the F.A.C. OCL believes that the Phase II Acid Rain permit application is not due at this time. If you have any questions about this information please contact Mr. Tom Hess at (610) 481-7620 or the undersigned at (610) 481-5240.

Sincerely,

A handwritten signature in cursive script that reads "Karen S. Winegardner".

Karen S. Winegardner
Environmental Engineer

cc: T. Hess
L. Adkins