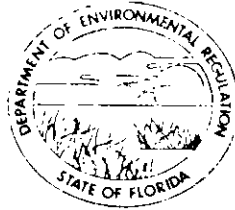


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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

June 9, 1987

Mr. Stephen L. Neck, P.E.
Air Consulting & Engineering
2106 N.W. 67th Place, Suite 4
Gainesville, Florida 32606

Dear Mr. Neck:

Re: Kissimmee Utilities Commission, Gas Turbine/Allowable,
NOx Emissions, Permit Nos. AO 49-093754 and PSD-FL-87

The Bureau of Air Quality Management (BAQM) has received your request and additional information dated February 25, 1987, and April 27, 1987, respectively, on behalf of Kissimmee Utilities Commission.

We forwarded this information to the USEPA, Region IV. Their response, as you can see in the copy attached, is to deny your request since the reported nitrogen content of the natural gas is not fuel bound nitrogen.

Unless supporting documentation, as specified in Bruce P. Miller's letter of June 1, 1987, is provided, credit cannot be given in the calculation of allowable NOx emissions under 40 CFR 60, Subpart GG.

Should you choose to pursue this request, please direct future correspondence on this matter to Mr. Bruce P. Miller, Air Program Branch, Region IV, 345 Courtland Street, N.E., Atlanta, Georgia 30365 and send a copy to our office.

Sincerely,

C. H. Fancy
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/TH/s

cc: Bruce P. Miller
Tom Sawicki

attachment



PM
6-2-87
Atlanta, Ga.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUN - 1 1987

4APT/APB-ljf

Mr. Clair Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
JUN 4 1987
BAQM

Re: Kissimmee Utilities (Osceola County)

Dear Mr. Fancy:

This is in regard to your letter of April 10, 1987, forwarding the above company's request to increase the allowable nitrogen oxides emissions from their 49.9 MW combined cycle gas turbine. They have requested to increase their allowable emissions concentration limit from 79 ppm to 130 ppm using the fuel bound nitrogen credit as provided for in the New Source Performance Standards, Subpart GG.

We have reviewed the company's request to use the nitrogen content of their natural gas supply in calculating the emissions rate from equations contained in Subpart GG, New Source Performance Standards. During our review, we contacted the Office of Air Quality Planning and Standards regarding the definition of fuel bound nitrogen and data regarding measured concentrations of fuel bound nitrogen in natural gas. Their response was that natural gas does not contain measurable amounts of fuel bound nitrogen and that the nitrogen content reported by the supplier is probably atmospheric nitrogen which is not credible as fuel bound nitrogen. Therefore, the company's analysis supporting their request to increase their nitrogen oxides emissions rate is not valid.

In summary, the company's request to increase nitrogen oxides emissions when burning natural gas should be denied on the basis that the reported nitrogen content of the natural gas is not fuel bound nitrogen. Unless the supplier is able to provide an analysis of their natural gas which determines fuel bound nitrogen only, with supporting documentation of test methods and procedures, credit cannot be given in the calculation of allowable nitrogen oxide emissions as provided under the New Source Performance Standards, Subpart GG.

If you have any questions regarding this determination, you may contact Michael Brandon of my staff at (404) 347-2864.

Sincerely,

Bruce P. Miller

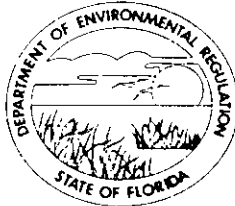
Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides and Toxics
Management Division

Terese Wilson }
Bill Thomas } 6-4-87 RAN

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Teresa's (copy)

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

April 10, 1987

Mr. Bruce Miller
Chief, Air Facilities Branch
Air & Waste Management Division
USEPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Miller:

Re: PSD-FL-087
Kissimmee Utilities (Osceola County)

Attached, for your information, is a copy of Kissimmee Utilities' request to increase NOx emission concentrations from their 49.9 MW-Combined Cycle Gas Turbine.

The construction permits for this unit, PSD-FL-087 and AC 49-46521, were originally issued on February 19, 1982, and November 25, 1981, respectively.

In 1983, the Company failed to apply for an operating permit within the time allowed by the construction permit. Therefore, we requested a submission of a new application. The application was reviewed and a new state permit was issued on March 30, 1984.

On April 1, 1984, we received the above mentioned request. Currently, we are in the process of modifying the BACT determination and specific conditions for state permits AC 49-74856 and AO 49-093754.

If you have any questions, please call Teresa Heron (Review Engineer) or Barry Andrews (BACT Coordinator) at (904)488-1344.

Sincerely,

Clair Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/TH/s

cc: John Turner, DER Orlando