



Technical Services, Inc.

December 15, 1995

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AIR REGULATION

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

Dear Mr. Brown:

This letter is submitted on behalf of Kissimmee Utility Authority in response to your letter of November 30, 1995 sent to them regarding the Acid Rain Program Phase II Permit Application and my recent telephone conversation with you on this matter. Kissimmee Utility Authority operates electric power generating equipment at two facilities in Osceola County: the Hansel facility in Kissimmee (facility ID 30 ORL 49 0001) and the Cane Island facility near Intercession City (facility ID 30 ORL 49 0043). Both facilities include a combined cycle gas turbine (CCGT). The CCGT at the Cane Island facility is subject to the acid rain regulations and a phase II permit application will be submitted for that facility. The CCGT at the Hansel facility, however, is not subject to the acid rain regulations since it is considered by the rules to be a simple combustion turbine.

The CCGT at the Hansel facility began operation in 1984 with the capability to use auxiliary firing. However, the auxiliary firing was never used and the capability for auxiliary firing was recently removed from the unit. According to 40 CFR 72.2 and 62-214.200(49), the definition of *Simple combustion turbine* "excludes combined cycle units with auxiliary firing, unless the unit did not use the auxiliary firing from 1985 through 1987 and does not use auxiliary firing at any time after November 15, 1990."

Since the CCGT at the Hansel facility has never used auxiliary firing and will not use auxiliary firing in the future, it is considered by the rule to be a simple combustion turbine. For this reason, it is not an affected source according to 40 CFR 72.6(b)(1) since it is "a simple combustion turbine that commenced operation before November 15, 1990."

My recent discussion with EPA staff in the acid rain program confirms this opinion and also indicates that the Hansel facility is not listed in any of the tables of affected sources. They also indicated that it was not necessary to request a formal applicability determination in this matter since the rule was reasonably clear in excluding this unit from the acid rain program.

Mr. John C. Brown, P. E.
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Please call me at (407) 859-7374 if you have any questions on this matter.

Very truly yours,

PERIGEE TECHNICAL SERVICES, INC.



Jerome J. Guidry, P.E., Q.E.P.
President

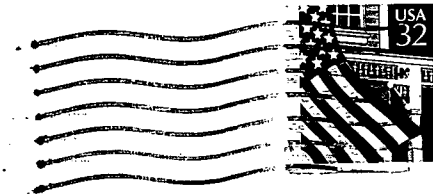
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cc: A. K. Sharma
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Kathleen Condon

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