

LARRY MATTERN  
Vice President of Power Supply  
E-mail: [lmattern@kua.com](mailto:lmattern@kua.com)



P.O. BOX 423219, KISSIMMEE, FLORIDA 34742-3219  
(407) 933-7777 FAX: 407-847-0787

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BUREAU OF AIR REGULATION

September 23, 2009

Mr. Jonathan Holtom, P.E., CPM  
Title V Program Administrator  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Holtom,

I have attached comments and proposed changes to the Draft/Proposed Title V Permit 0970043-017-AV for our Cane Island Facility. Please consider these proposed changes for the final permit. I am the responsible official of the Title V source addressed in this submittal. I certify, based on information and belief formed after reasonable inquiry, that the statements made in this submittal are true, accurate and complete.

Sincerely,

A handwritten signature in cursive script that reads "Larry Mattern".

Larry Mattern  
Vice President of Power Supply

cc: Jerome Guidry, Perigee Technical Services, Inc.  
Amy Deese, FMPA

**Comments and Proposed Changes to  
Draft-Proposed Title V Permit 0970043-017-AV**

**Condition FW.9**

Move the words "when, and if, such requirement becomes applicable" so that the condition reads:

Prevention of Accidental Releases (Section 112(r) of CAA). When and if such requirement becomes applicable

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans ...

**Condition A.4**

Change "12 months of the total allowable hours of operation." to "12 months."

**Conditions A.9 and B.9**

Delete the words "and reported semi-annually to the Central District"

**Conditions A.15 and B.15**

Change Method "5B" to Method "5" in the table

**Conditions A.17, B.17 and C.29**

Change "each EU" to "this EU"

**Replace conditions A.19 and B.19 with the following wording and add a condition in Subsection C with the following wording:**

VE and NO<sub>x</sub> Testing. Emission testing for visible emissions and NO<sub>x</sub> shall be performed annually, in accordance with Specific Condition A.15. [or B.15 or C.27], with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using the following EPA reference methods in accordance with 40 CFR 60, Appendix A:

- a. Method 9 for VE;
- b. Method 7E or Method 20 for NO<sub>x</sub>.

NO<sub>x</sub> emissions data collected during the required continuous monitor Relative Accuracy Test Audits (RATA's) may be used to demonstrate compliance with the NO<sub>x</sub> standard. Three RATA test runs (each of at least 21 minutes duration) may be combined to provide each compliance test run. Calibrations for bias and drift correction may be performed after every three RATA test runs to allow for continuous compliance test run data collection.

**Conditions A.20 and B.20**

After the words "ASTM D129-91", insert the methods "D1552-01, D5453-06"

**EU 002 description**

Change "PG&111EA" to "PG7111EA"

**Comments and Proposed Changes to  
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**Condition B.17**

Change "See Specific Condition B.19" to "See Specific Condition B.20"

**Condition B.18**

Change "NO<sub>x</sub>, PM" to "NO<sub>x</sub>, PM, SO<sub>2</sub>"

**Condition B.23**

Make consistent with A.23

**Condition C.4**

Insert "(continuous operation)" after the words "8,760 hours per year"

**Condition C.14**

Change VE limit in table from "<10 percent opacity" to "10 percent opacity"

**Condition C.15(a)(2)**

Change "gas fuel oil" to "fuel oil"

**Condition C.26**

Insert at the end of the last sentence "to include the later editions of the methods specified"

**Condition C.32**

Change "62-297.340" to "62-297.310(7)"

**Condition C.37**

Change "60.7(a)(7)(c)" to "60.7(c)"

**Appendices Table 1, EU 003**

Pollutant VE: Change "< 10 percent opacity" to "10 percent opacity"

Pollutant SO<sub>2</sub>: Change "0.0005 sulfur" to "0.05 % sulfur"

**Appendix Condition TR7**

KUA understands that annual and renewal testing requirements are waived for parameters which relate to a specific fuel that has been burned for less than 400 hours during the prior year and the year prior to renewal per 62-297.310(7). As an example, we understand that the renewal testing requirements for Be, As, Hg, and Pb will be waived if fuel oil was burned for less than 400 hours during the year prior to renewal.