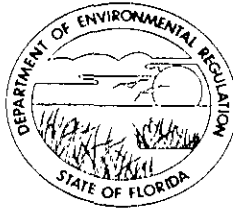


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

November 6, 1987

Mr. J. S. Crall, Director
Environmental Division
Orlando Utilities Commission
500 South Orange Avenue
P.O. Box 3193
Orlando, Florida 32802

Re: Proposed Air Quality Analysis Work Plan for the Proposed
Combustion Turbines at the OUC Indian River Plant

Dear Mr. Crall:

I have reviewed your proposed Air Quality Analysis Work Plan for this project and found it to be generally satisfactory. However, there are a few points that must be clarified.


1. For the proposed turbines, a demonstration that aerodynamic downwash is not needed must be included in the application package.
2. Aerodynamic downwash must be considered and modeled, if need be, at all other modeled sources.
3. The Brown Boveri Model GT-8 combustion turbine has higher emission rates for both CO and unburned hydrocarbons when burning gas as compared to oil. The exit velocity difference between burning gas and oil may not be enough to produce reduced impacts when burning gas as compared to oil. Consequently, both fuels should be modeled for CO for this turbine. Furthermore, the burning of gas in this type of turbine produces a potential annual emission of 104 TPY of unburned hydrocarbons. Any net increase of 100 TPY or more of volatile organic compounds subject to new source review would require an ambient impact analysis, including the gathering of ambient air quality data.
4. The modeling of minor sources, less than 20 TPY, is not necessary unless such a source is in the immediate vicinity of your facility.

Mr. J. S. Crall, Director
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5. Due to previously modeled high impacts near the Stanton Energy Center, special attention needs to be given to the placement of receptors near the Stanton Energy Center.

If I can be of any further assistance in this matter please don't hesitate to contact me at (904) 488-1344.

Sincerely,



Max A. Linn
Meteorologist
Bureau of Air Quality
Management

ML/ss



SEPT. 9, 1987
Tallahassee, FL

1. Jim CRALL Orlando Utilities 305/423-9141
2. Steven M. Day Black & Veatch 913/339-2880
3. BRIAN A. PETERMANN BLACK & VEATCH 913 339-2124
4. PRADDEEP RAVAL BAQM 904 488 1344
5. Max Linn BAQM (904) 488-1344
6. C H Fancy BAQM 904 488 1344

DO NOT WRITE IN THIS SPACE

PGN-172A

9/9/87 Orlando Utilities

Indian River Plant

Peeking Units

1 to 4 Turbines Oil or N. Gas

Just beyond SL for stack heights

Make a copy of N.C. Screening Technique ✓

Combined Sources Unit #1 & 2

Ask Tom about data tape for Orlando