

Preston -  
Is this  
it? I guess  
is working on  
it. Patsy

Patty Ed Godwin  
Reedy Creek (407) 224-4943

Delivered  
modification  
Oct 4, 1993.  
Eliminate fever oil  
and specify monitoring/  
test. How we  
responded? Preston

REEDY CREEK IMPROVEMENT DISTRICT

COST CENTER	ACCOUNT	PUR. ORDER	INVOICE NUMBER	AMOUNT	DESCRIPTION
260	3699999		AC48-137740	250.00	PERMIT AMEND PROCESS FEE

FL DEP FL DEPT OF ENVIRONMENTAL PROTECTION

41544

REEDY CREEK  
IMPROVEMENT DISTRICT  
P.O. BOX 10,170 LAKE BUENA VISTA, FL 32830-0170

SUN BANK, N.A.  
MAIN OFFICE  
P.O. BOX 3833  
ORLANDO, FL 32897  
63-838-215  
631

0000736 41544  
DATE 10/08/93

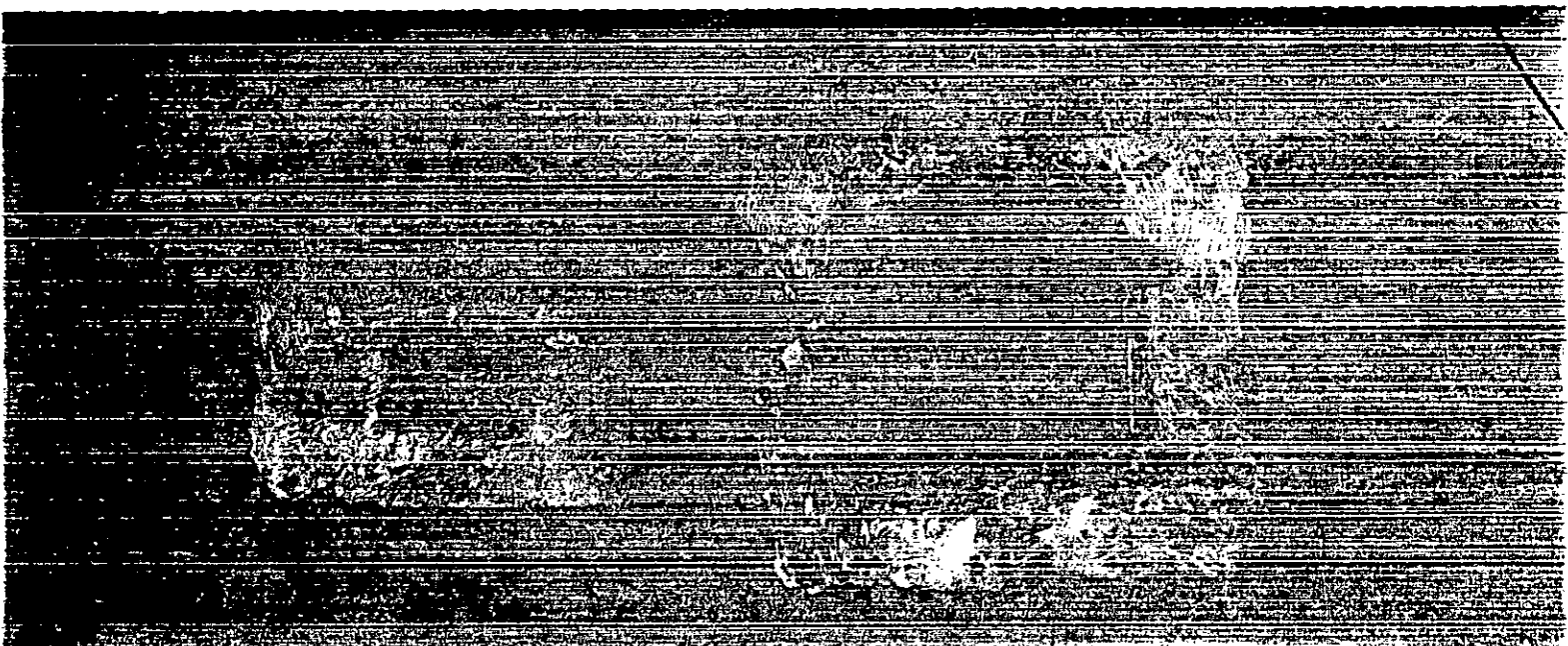
AMOUNT \*\*\*\*\*250.00\*\*

PAY TO THE ORDER OF \*\*\*\*\*250.00 DOLLARS

FL DEPT OF ENVIRONMENTAL PROTECTION  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FL  
32399-2400

*Ann G. Blakeslee*

⑈041544⑈ ⑈063108389⑈0215252036313⑈





**REEDY CREEK  
IMPROVEMENT  
DISTRICT**

DISTRICT ADMINISTRATOR  
**Thomas M. Moses**

October 8, 1993

RECEIVED  
D.R. - MAIL ROOM  
1993 OCT 11 AM 9:59

C. H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

0000736

Re: Reedy Creek Improvement District  
AC48-137740, Request for Permit Amendment

Dear Mr. Fancy:

We are enclosing our check in the amount of \$250 for a permit amendment submitted on September 29 for the above-referenced permit.

We appreciate your letter of October 5 advising us of the fee and allowing us to forward the check to you.

Sincerely,

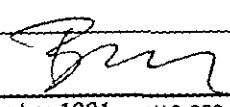
Thomas M. Moses  
District Administrator

TMM:dip  
Enclosure: Check

602222

Rec'd 10/11/93 KKW

Your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. Thomas M. Moses District Administrator Reedy Creek Improvement District Post Office Box 10170 Lake Buena Vista, FL 32830	4a. Article Number P 230 524 309	
	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
	7. Date of Delivery 10 7 93	
5. Signature (Addressee)	8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent) 		

Thank you for using Return Receipt Service.

P 230 524 309



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

Sent to	
Mr. Thomas M. Moses	
Street and No.	
Post Office Box 10170	
P.O., State and ZIP Code	
Lake Buena Vista, FL 32830	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark, or Date	
Mailed: 10/5/93 AC48-137740	

PS Form 3800, June 1991



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

October 5, 1993

## CERTIFIED MAIL-RETURN RECEIPT

Mr. Thomas M. Moses  
District Administrator  
Reedy Creek Improvement District  
Post Office Box 10170  
Lake Buena Vista, FL 32830-0170

Dear Mr. Moses:

RE: Reedy Creek Improvement District  
AC48-137740, Request for Permit Amendment

The Bureau of Air Regulation received your September 29, 1993, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$250 processing fee for a permit amendment; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

*for* C. H. Fancy, P.E.  
Chief

Bureau of Air Regulation

CHF/pa

cc: Teresa Heron



**REEDY CREEK  
IMPROVEMENT DISTRICT**

P.O. BOX 10170 LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 828-2241

RECEIVED

OCT 4 1993

Division of Air  
Resources Management

September 29, 1993

Mr. Claire H. Fancy, P.E.  
Central Air Permitting  
Division of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Orange County--AC48-137740 (AO48-170280)  
Reedy Creek Improvement District  
Gas Turbine Generator and Heat Recovery Steam Generator with Duct Burner

Dear Mr. Fancy:

The purpose of this correspondence is to request a change in the continuous opacity monitoring requirement for the above-referenced source. The construction permit Specific Condition #10(c) requires compliance with 40 CFR 60, Subpart Db, "Industrial Steam Generating Units". The subject Heat Recovery Steam Generator is equipped with duct burners that are capable of firing natural gas as the primary fuel and #2 fuel oil as a backup fuel. This capability to fire #2 fuel oil in the Heat Recovery Steam Generator results in the requirement to install, operate and maintain a Continuous Opacity Monitor System (COMS). RCID currently operates a COMS for this purpose. NSPS Section 60.48b(a) and Section 60.43b(f) are the pertinent references for this requirement.

RCID proposes to physically disconnect the fuel oil lines from the Heat Recovery Steam Generator, thereby rendering it incapable of firing fuel oil and eliminating the requirement for a continuous opacity monitor system. RCID requests that the construction permit language be modified as follows (new text is *italicized*):

Specific Condition #2:

Present:

"Natural gas shall be the primary fuel fired in the turbine and duct burner system. No. 2 fuel oil can be used as a backup fuel for up to 14 days per year.

Requested:

"Natural gas shall be the primary fuel fired in the turbine and duct burner system. No. 2 fuel oil can be used as a backup fuel *in the gas turbine only* for up to 14 days per year.

Mr. C.H. Fancy, P.E.  
29 September, 1992  
Page 2

Specific Condition #5:

Present:

"The duct burner NOX emissions shall not exceed (corresponding to 0.2 lb/MMBtu) 4.6 lb/hr for gas or oil at 23 MMBtu heat input or 40 lbs/hr for gas or oil at 198 MMBtu/hr."

Requested:

"The duct burner NOX emissions shall not exceed (corresponding to 0.2 lb/MMBtu) 4.6 lb/hr for gas at 23 MMBtu heat input or 40 lbs/hr for gas at 198 MMBtu/hr."

Specific Condition #10(c):

Present:

"The project shall comply with all the applicable requirements of:  
a. Chapter 17-2, FAC  
b. 40 CFR 60, Subpart GG, Gas Turbines  
c. 40 CFR 60, Subpart Db, Industrial Steam Generating Units."

Requested:

"The project shall comply with all the applicable requirements of:  
a. Chapter 17-2, FAC  
b. 40 CFR 60, Subpart GG, Gas Turbines"

RCID appreciates the Department's consideration in this matter. If you have any questions or comments, please call Ms. Elaine Potusky at (407) 824-6113 or Mr. Edward Godwin, P.E. at (407) 824-4943.

Sincerely,



Thomas M. Moses  
District Administrator

cc: Alex Alexander, P.E.  
John Brown, P.E.  
Edward Godwin, P.E.  
Glenn McLeod  
Elaine Potusky

PS Form 3801, July 1993 447-945

**SENDER: Complete items 1, 2, 3 and 4.**  
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1.  Show to whom, date and address of delivery.  
 2.  Restricted Delivery.

3. Article Addressed to:  
 Thomas M. Moses  
 Reedy Creek Improvement  
 P.O. Box 10170  
 Lake Buena Vista, FL 32830-0170

4. Type of Service:  Registered  Insured  Certified  Express Mail  COD  
 Article Number: P062921954

Always obtain signature of addressee or agent and  
**DATE DELIVERED.**

5. Signature - Addressee  
 X

6. Signature - Agent  
 X *BM*

7. Date of Delivery  
 1-15-93

8. Address *fee paid*

DOMESTIC RETURN R

P 062 921 954

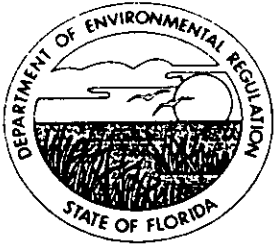


**Receipt for Certified Mail**  
 No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

Name <i>Thomas Moses</i>	
Street and No. <i>Reedy Creek Drp.</i>	
P.O. State and Zip Code <i>Lake Buena Vista, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>AC 48-137740 1-13-93 PSD-F1-123</i>	

PS Form 3800, June 1991





# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 7, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas M. Moses  
District Administrator  
Reedy Creek Improvement District  
Post Office Box 10170  
Lake Buena Vista, Florida 32830-0170

Re: Request for Amendment of Permit No. AC48-137740, PSD-FL-123

This is in reply to your letters dated September 22 and October 9, 1992, requesting amendment of the subject permit to (1) avoid the continuous emission monitoring requirement of Subpart Db, (2) include a limit on total annual hours for fuel oil firing, and (3) convert the weekly time limit on diesel generator operation to an annual time limit.

Item (1) above will not require an amendment for the following reason. Since 40 CFR 60, Subpart Db, Section 60.48b(h) provides an exemption from the continuous emission monitoring (CEM) requirement for the primary operation mode (i.e., turbine firing), the Department will not consider the "duct burner only" operation as a "stand alone boiler" but rather as a temporary operation mode of the combined cycle system wherein the turbine is unfired. Therefore, the Subpart Db CEM exemption will still apply when the facility must be operated without firing the turbine. No amendment is needed as long as the primary operation mode requires turbine firing.

Items (2) and (3) above will be amended since the permit language should be clarified. Therefore, specific conditions 2, 5, and 7 are amended as shown below.

## Specific Condition No. 2

Present:

Only natural gas shall be fired in the turbine and duct burner. No. 2 fuel oil shall be used in periods of curtailed natural gas supply. The duration of oil firing shall not exceed 14 days annually.

Mr. Thomas M. Moses  
Reedy Creek Improvement District  
Page 2

Amended:

Natural gas shall be the primary fuel fired in the turbine and duct burner system. No. 2 fuel oil can be used as a backup fuel for up to 14 days per year.

Specific Condition No. 5 (Footnote 1)

Present:

Oil will be fired only when there is natural gas curtailment. It will be fired for no more than 14 days annually.

Amended:

Fuel oil firing shall be limited to 14 days per year.

Specific Condition No. 7

Present:

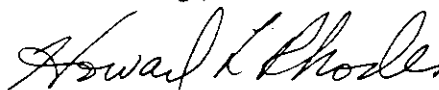
The "Black Start" Cummins No. 2 oil fired emergency generator, when fired on a normal basis to maintain a state of readiness shall not be operated beyond the 10 minutes/week check out period.

Amended:

The "Black Start" Cummins No. 2 oil fired emergency generator, when fired on a normal basis to maintain a state of readiness, shall not be operated for more than 9 hours per year.

This letter shall become an attachment of construction permit No. AC48-137740 (PSD-FL-123).

Sincerely,

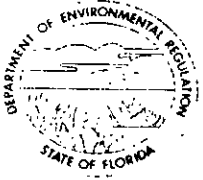


Howard L. Rhodes, P.E.  
Director  
Division of Air Resources  
Management

HR/JR/w

cc: A. Zahm, CD  
J. Harper, EPA

H. Culp, P.E.  
J. Bunyak, NPS



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From _____	Date: _____

# Interoffice Memorandum

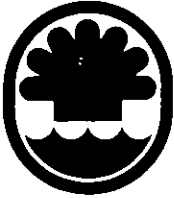
TO: Howard Rhodes  
FROM: Clair Fancy *CF*  
DATE: January 7, 1993  
SUBJECT: Amendment of Permit No. AC48-137740, PSD-FL-123  
Reedy Creek Improvement District

Attached for your approval and signature is a permit amendment prepared by the Bureau of Air Regulation. The amendments consist of minor changes in permit language to clarify the limitations on fuel oil use and emergency generator operation.

I recommend your approval and signature.

HR/CF/w

Attachments



**REEDY CREEK  
IMPROVEMENT DISTRICT**

PO. BOX 10170 LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 828-2241

October 9, 1992

RECEIVED  
DER - MAIL ROOM  
1992 OCT 13 AM 11:19

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: Orange County - A.P.  
Reedy Creek Improvement District  
Gas Turbine/Heat Recovery Steam Generator  
AC48-137740

Dear Mr. Fancy:

Please find enclosed our check for \$250 that represents the application processing fee referenced in your letter of September 30, 1992. This fee references our September 22, 1992 letter request for a construction permit modification for the subject source.

In reviewing our September 22 request, we have discovered that our discussion of the requested changes to Specific Condition 4 did not provide any information on the historical capacity factor of the HRSG. You may find this information to be of value in your consideration of our request. The annual capacity factors of the HRSG as a stand-alone boiler were: 1989 - 1.9%; 1990 - 3.0%; 1991 - 2.9%; 1992 (to date) - 2.9%.

RCID appreciates the Department's consideration in this matter. We trust that processing of our application may now proceed. Please do not hesitate to call Mr. Edward Godwin at (407) 824-4943 if you require any additional information.

Sincerely,

Thomas M. Moses  
District Administrator

Enclosure

001031

EG/TMM/jm

cc: Edward Godwin, P.E., Reedy Creek Energy Services, Inc.  
Kennard F. Kosky, P.E., KBN Engineering & Applied Sciences

*M. David J. Reynolds*  
*A. Zahn, C. West*



**REEDY CREEK  
IMPROVEMENT DISTRICT**

P.O. BOX 10170 LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 828-2241

October 9, 1992

RECEIVED  
PER-MAIL ROOM  
1992 OCT 13 AM 11:19

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: Orange County - A.P.  
Reedy Creek Improvement District  
Gas Turbine/Heat Recovery Steam Generator  
AC48-137740

Dear Mr. Fancy:

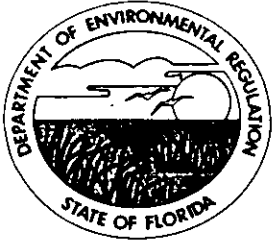
Please find enclosed our check for \$250 that represents the application processing fee referenced in your letter of September 30, 1992. This fee references our September 22, 1992 letter request for a construction permit modification for the subject source.

In reviewing our September 22 request, we have discovered that our discussion of the requested changes to Specific Condition 4 did not provide any information on the historical capacity factor of the HRSG. You may find this information to be of value in your consideration of our request. The annual capacity factors of the HRSG as a stand-alone boiler were: 1989 - 1.9%; 1990 - 3.0%; 1991 - 2.9%; 1992 (to date) - 2.9%.

RCID appreciates the Department's consideration in this matter. We trust that processing of our application may now

<b>REEDY CREEK IMPROVEMENT DISTRICT - UTILITIES DIVISION</b>		63-215 215 631	CHECK NO. <b>00215705</b>
REVENUE FUND - OPERATING ACCOUNT P. O. Box 10,170 Lake Buena Vista, FL 32830-0170		<b>215705</b>	
<b>TWO HUNDRED FIFTY DOLLARS NO CENTS</b>			
PAY TO THE ORDER OF	DATE	CHECK AMOUNT	
<b>DEPT OF ENVIR REGULATION 2600 BLAIR STONE RD TALLAHASSEE, FL 32399</b>	<b>10-08-92</b>	<b>*****250.00</b>	
	BY	  REEDY CREEK IMPROVEMENT DISTRICT	
SUN BANK, N.A. MAIN OFFICE, P.O. BOX 3833, ORLANDO, FL 32897			

⑈ 215705⑈ ⑆06310215210215252051550⑈



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

September 30, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Thomas M. Moses  
District Administrator  
Reedy Creek Improvement District  
P. O. Box 10170  
Lake Buena Vista, FL 32830-0170

Dear Mr. Moses:

RE: Air Construction Permit No. AC 48-137740  
Request for Permit Amendment

The Bureau of Air Regulation received your September 22, 1992, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$250 processing fee for a permit amendment; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

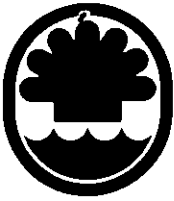
*Patricia G. Adams*

*for* C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

cc: Mirza Baig





**REEDY CREEK  
IMPROVEMENT DISTRICT-UTILITIES DIVISION**

P.O. BOX 10170, LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 824-4913

September 22, 1992

**RECEIVED**

SEP 25 1992

Division of Air  
Resources Management

Mr. C. H. Fancy, P.E., Chief  
Bureaus of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: Orange County - A.P.  
Reedy Creek Improvement District  
Gas Turbine/Heat Recovery Steam Generator  
AC 48-137740

Dear Mr. Fancy:

Reedy Creek Improvement District was issued the above referenced permit dated March 3, 1988, to construct and operate a cogeneration facility consisting of a 38 MW gas turbine and heat recovery steam generator (HRSG). The HRSG has a duct burner system capable of supplemental firing as well as firing as a stand-alone boiler. The primary fuel for both the gas turbine and duct burners is natural gas.

Representatives for RCID met with Mr. Alan Zahm of the Central District on July 16, 1992 to discuss the need to make some clarifications in the operation permit (A048-170280). While a few of the changes could be performed by the Central District, a federally enforceable condition must be added to provide clarification in the construction permit. It is RCID's understanding that federally enforceable provisions must be specified in the construction permit. Mr. Zahm indicated that RCID should request a change to the construction permit from your Bureau. In addition to the federally enforceable change requested by this letter, some other minor changes are also requested. Listed below are the changes requested.

Specific Condition 4--This condition of the construction permit states: "When the gas turbine is not in operation, the duct burner heat input may be increased up to, but not to exceed, 198 MMBtu/hr." This is the same condition incorporated into the operation permit (i.e., Specific Condition 4) and allows the operation of the HRSG as a stand-alone boiler. Since there is no limitation on the capacity factor of such operation, then all the requirements of the New Source

407-828-2241 - FAX 407-824-4529.



Mr. C. H. Fancy, P.E.  
September 22, 1992  
Page 2

Performance Standards (NSPS) Subpart Db apply. The NSPS require a continuous emission monitor for nitrogen oxides (NOx) in all affected facilities except those for which a specific exemption applies. Exemption applies only to duct burners in a combined cycle system [see 40 Code of Federal Regulations (CFR) Section 60.48b(h)] and facilities that combust oil and natural gas, have a 10 percent capacity factor, and have federally enforceable limits to the facility operation (see 40 CFR Section 60.44b(j)).

When the permit was submitted, it was RCID's intent to operate the HRSG as a stand-alone boiler only when the gas turbine was not operating which intuitively would be for a limited time. However, the specific condition issued does not limit operation of the HRSG as a stand-alone boiler. To date the HRSG has been operated as a stand-alone boiler for much less than a 10 percent capacity factor. RCID requests that Specific Condition 4 of the construction permit be amended to limit the operation of the HRSG as a stand-alone boiler to less than 10 percent capacity factor. The requested amendment would add the following wording to Specific Condition 4:

"The total annual heat input under this mode of operation shall not exceed 173,448 MMBtu/hr."

The requested heat input of 173,448 MMBtu/hr is the maximum heat input of the HRSG as a stand-alone boiler at a 10 percent capacity factor (198 MMBtu/hr x 8,760 hrs/yr x 0.1).

Specific Conditions 2 and 5--These conditions limit the operation of the gas turbine/heat recovery system on oil. Specifically, Specific Condition 2 states: "Only natural gas shall be fired in the turbine and duct burner. No. 2 fuel oil shall be used in periods of curtailed natural gas supply. The duration of oil firing shall not exceed 14 days annually." Footnote 1 of Specific Condition 5 states: "Oil will be fired only when there is natural gas curtailment. It will be fired for no more than 14 days annually." The same conditions were placed in the operation permit (Specific Conditions 2 and 5, respectively). However, the basis for the Prevention of Significant Deterioration (PSD) applicability and limitation on oil firing (i.e., tons per year limitations in annual emissions for oil firing) was 14 full-load equivalent days. In addition, these conditions would limit the operation on oil to only when gas curtailments occur. While this is normally the case, other conditions may occur where oil firing is required; e.g., testing or maintenance. Such conditions would appear to be unauthorized by these conditions. Since

Mr. C. H. Fancy, P.E.  
September 22, 1992  
Page 3

the wording in these conditions appear unclear, it is requested that these conditions be re-worded as:

Specific Condition 2--"Natural gas shall be the primary fuel fired in the turbine and duct burner system. No. 2 fuel oil can be used as a backup fuel and shall not exceed a heat input of 151,200 MMBtu/yr."

Specific Condition 5--"The maximum annual heat input when firing oil shall be limited to an equivalent of 151,200 MMBtu/yr."

The 151,200 MMBtu/yr is the maximum hourly heat input times the number of hours in 14 days (450 MMBtu/hr x 24 hr/day x 14 days/yr).

Specific Condition 7--This condition limits the operation of the "black start" Cummins diesel generator to 10 minutes/week. Such operation is insufficient for the purpose of testing the generator and maintain a state of readiness. Therefore, a change in this condition is requested which would allow using the generator for up to 520 minutes per year (10 minutes/week x 52 weeks/yr). The requested revision is:

"The Black Start Cummins No. 2 oil fired emergency generator, when fired on a normal basis to maintain a state of readiness, shall not be operated for more than 520 minutes per year." (Note: the remainder of condition remains the same).

RCID appreciates the Department's consideration in this matter. Please call if you have any questions.

Sincerely,



Thomas M. Moses  
District Administrator

EG/TMM/fjw

cc: Edward Godwin, P.E., Reedy Creek Energy Services, Inc.  
Kennard F. Kosky, P.E., KNB Engineering

*Bob Kohl*

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address.      2.  Restricted Delivery  
 †(Extra charge)†      †(Extra charge)†

3. Article Addressed to: Mr. H. Robert Kehl, P.E. Reedy Creek Energy Serv. Inc. P.O. BOX 10000 LAKE BUENA VISTA, FL 32830-1000	4. Article Number P 832 538 938
5. Signature - Addressee X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
6. Signature - Agent X RB	Always obtain signature of addressee or agent and <b>DELIVERED.</b> 8. Addressee's Address (ONLY if requested and fee paid) Division of Air Resources Management
7. Date of Delivery 8-26-91	


PS Form 3811, Mar. 1987

★ U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

P 832 538 938

**Certified Mail Receipt**  
 No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

 UNITED STATES POSTAL SERVICE

Sent to	Mr. H. Robert Kehl
Street & No.	Reedy Creek Energy
P.O., State & ZIP Code	Lake Buena Vista, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	8-23-91
	AC 48-137740

PS Form 3800, June 1990



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 23, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. H. Robert Kohl, P.E., Director  
Reedy Creek Energy Services, Inc.  
Post Office Box 10000  
Lake Buena Vista, Florida 32830-1000

Re: Combined Cycle Gas Turbine with Duct Burner  
Permit Number AC 48-137740

Dear Mr. Kohl:

The Central Florida District office has forwarded your letter dated May 3, 1991, requesting an amendment to Specific Condition No. 7 of the above referenced project. Specifically, you would like to operate the "Black Start" Cummins No. 2 oil fired emergency generator on a continuous basis during shortfall periods, and not be limited to the 10 minutes per week checkout period (as currently allowed) to maintain a state of readiness.

The Department will need the following information before it can process your request:

1. What is the new maximum time in hours/week and hours/year you would like to operate the emergency generator at?
2. Will there be a significant net increase in emissions if the emergency generator is allowed to operate at the new (higher) operating time?
3. Submit a list of all air sources with the corresponding permit numbers and expiration dates along with the allowable and actual emissions for the entire facility, before and after the proposed modification.

Mr. H. Robert Kohl  
Page 2 of 2

We will continue to process your request as soon as a satisfactory response to the above requested information has been received. If you have any questions, please feel free to contact Mirza Baig, of my staff, at 904-488-1344.

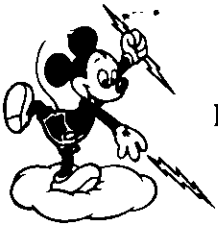
Sincerely,



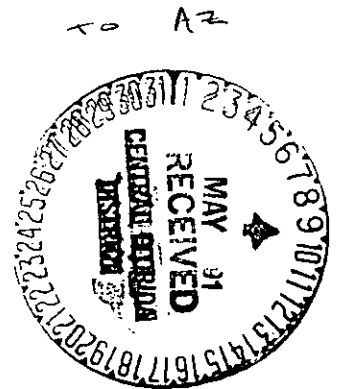
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/MB/plm

c: John Turner, Central Dist.



REEDY CREEK ENERGY SERVICES, INC.



May 3, 1991

Mr. Alex Alexander
Deputy Assistant Secretary
Florida Department of Environmental Regulation
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

RE: Combined Cycle Gas Turbine with Duct Burner
FDER Permit A048-170280

Dear Mr. Alexander: AC48-137740

RECEIVED
MAY 28 1991
Division of Air Resources Management

This letter will serve to confirm our conversation of May 2, 1991, wherein we discussed the potential use of our 1,200 kw "Black Start Emergency Diesel Generator". As you are aware, the electrical power system in the State of Florida has been and will continue to be in a state of duress where available reserves may not be adequate to meet the demand this summer. As a member of the Florida Coordinating Group, Reedy Creek Improvement District and Reedy Creek Energy Services Inc. have an obligation to assist in the support of the state power system.

We are proposing that we be allowed to use our 1,200 kw "Black Start Emergency Diesel Generator" in support of the state's power needs during periods of impending or actual electrical power shortfall. This would require continuous operation of the generator during said shortfall periods which would exceed the currently permitted usage of ten minutes/week.

In order to provide you with reasonable assurances that the generator is being operated in actual support of state power needs, we propose that an after-the-fact report be submitted to your agency by us within ten working days of the cessation of operation. This report would contain the actual hours and dates of operation, total megawatthours produced during that period and the reasons for having to operate the generator for an extended period.

S-C-# 7

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO	
		ACTION DUE DATE	
1. TO: (NAME, OFFICE, LOCATION)	Barry Andrews	Initial	Date
2.	Bureau of Air Regulation	Initial	Date
3.	Department of Environmental Regulation Twin Towers Office Building	Initial	Date
4.	2600 Blair Stone Road Tallahassee, FL 32399-2400	Initial	Date

REMARKS:

Please process Mr. Kohl's 5/3/91 letter as a request to change the construction permit AC48-137740 and copy us on correspondence.

**RECEIVED**

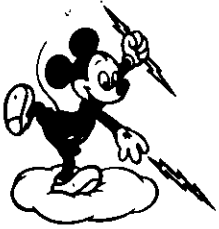
MAY 28 1991

Division of Air Resources Management

INFORMATION	
<input type="checkbox"/>	Review & Return
<input type="checkbox"/>	Review & File
<input type="checkbox"/>	Initial & Forward
DISPOSITION	
<input type="checkbox"/>	Review & Respond
<input type="checkbox"/>	Prepare Response
<input type="checkbox"/>	For My Signature
<input type="checkbox"/>	For Your Signature
<input type="checkbox"/>	Let's Discuss
<input type="checkbox"/>	Set Up Meeting
<input type="checkbox"/>	Investigate & Report
<input type="checkbox"/>	Initial & Forward
<input type="checkbox"/>	Distribute
<input type="checkbox"/>	Concurrence
<input type="checkbox"/>	For Processing
<input type="checkbox"/>	Initial & Return

FROM: John Turner

DATE 5/24/91  
PHONE SC 325-1202



Mr. Alex Alexander  
May 3, 1991  
Page 2

We respectfully request your favorable consideration of this proposal. If you have any comments or questions, please call me at (407) 824-4026.

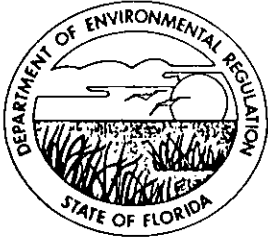
Sincerely,

*H. Robert Kohl*  
H. Robert Kohl, P.E.  
Director

EG/HK/fw

cc: Tom Moses  
Bob Penn  
*M. King*





# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

H. Robert Kohl, P.E., Director  
Reedy Creek Energy Services, Incorporated  
Post Office Box 10,000  
Lake Buena Vista, Florida 32830-1000

OCD-AP-91-423

Orange County - AP  
Combined Cycle Gas Fired  
Turbine Generator  
AO48-170280 and AC48-137740

Dear Mr. Kohl:

Your March 3, 1991 request to allow operation of the "Black Start Emergency Diesel Generator" in excess of the permitted limitation on hours of operation is being forwarded to the Bureau of Air Regulation staff in Tallahassee for their review. The air construction permit AC48-137740 issued by that office must be modified before our office can modify the air operating permit AO48-170280.

If you have any questions, please call John Turner at 407/894-7555 or write to the above address.

Sincerely,

Alan D. Zahm, P.E.  
Supervisor, Permitting  
Air Resources Management

22 May '91  
Date

AA/jtt

cc: Barry Andrews



REEDY CREEK  
IMPROVEMENT DISTRICT

P.O. BOX 10170 LAKE BUENA VISTA, FLORIDA 32830-0170 TELEPHONE (407) 828-2034

RECEIVED

March 1, 1991

MAR 05 1991

DER - BAQM

Mr. Clair H. Fancy, P.E.  
Central Air Permitting  
Division of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Orange County--AC 48-137740 (AO 48-170280)  
Reedy Creek Improvement District  
Gas Turbine and Heat Recovery Steam Generator with  
Duct Burner

Dear Mr. Fancy:

The purpose of this correspondence is to request a change in the sulfur dioxide emission limit for the above-referenced source when firing natural gas. The construction permit issued for the gas turbine plant has permitted SO<sub>2</sub> limits of 0.2 lb/hr and 0.8 ton per year (TPY) when firing natural gas. The operating permit has included these limits. This maximum SO<sub>2</sub> emission limit (i.e., 0.2 lb/hr) was based on the emission factor contained in the U.S. Environmental Protection Agency (EPA) document AP-42 (Compilation of Air Pollutant Emission Factors). The emission factor is based on an average sulfur content of natural gas of 0.2 grain/100 cubic feet (cf) of natural gas.

Initial compliance determinations using fuel analyses suggested that this limit was appropriate. However, recent fuel analyses provided by Florida Gas Transmission Company (FGT) during our compliance test period indicated a sulfur content of 0.35 gr/100 cf, which numerically exceeds the permitted amount. After further investigation and discussions with FGT, it is apparent that the sulfur content of pipeline natural gas in Florida is higher than the AP-42 emission factor and is somewhat variable. The main source of sulfur in pipeline natural gas is odorants (dimethyl sulfide and mercaptan) placed in the natural gas for safety reasons and small amounts of hydrogen sulfide. An evaluation of 8 months of data provided by FGT indicates an average sulfur content of 0.43 gr/100 cf with a maximum of 0.8 gr/100 cf (see Table 1).

FDER Permit AC48-170280  
March 1, 1991  
Page 2

Since Reedy Creek Improvement District has no control over the sulfur content in the pipeline natural gas (and neither does any other user), a permit modification is respectfully requested. In order to assure that future compliance determinations do not exceed a revised permit limit, we request an emission limit based on 1.2 gr/100 cf or 1.2 lb SO<sub>2</sub>/hr (345x10<sup>6</sup> Btu/hr x cf/1,024 Btu x 1.2 gr sulfur (S)/100 cf x lb/7,000 gr x 2 lb SO<sub>2</sub>/lb S). The annual SO<sub>2</sub> emissions would be calculated as 5.1 TPY for 8,760 hours/yr operation which was authorized in the construction permit. The total SO<sub>2</sub> emissions from both natural gas and oil firing would be 25.1 TPY with this requested permit change. It should be noted that oil firing is limited to no more than 14 days per year. The annual permit limit for SO<sub>2</sub> is less than the Prevention of Significant Deterioration (PSD) significant emission rate of 40 TPY.

Please call if you have any questions or comments.

Sincerely,



Thomas M. Moses  
District Administrator

EG/TMM/fjw

cc: Alex Alexander, P.E., FDER Central District  
Charles Collins, P.E., FDER Central District  
Edward Godwin, P.E., RCES  
Kennard F. Kosky, P.E., KBN

*B. Andrews*

TABLE I

90009A1  
11/20/90Sulfur Content, Heat Content, and SO<sub>2</sub> Emission Factors for Natural Gas

Date	Sulfur Content (gr/100 cf)	Heat Content (Btu)	SO <sub>2</sub> Emission Factor (lb/10 <sup>6</sup> Btu)	SO <sub>2</sub> Emission Factor (lb/10 <sup>6</sup> cf)
2/6/90	0.30	1,031	0.00083	0.857
2/13/90	0.05	1,028	0.00014	0.143
2/20/90	0.35	1,025	0.00098	1.000
2/27/90	0.45	1,024	0.00126	1.286
3/6/90	0.45	1,025	0.00125	1.286
3/13/90	0.30	1,026	0.00084	0.857
3/20/90	0.35	1,026	0.00097	1.000
3/27/90	0.35	1,025	0.00098	1.000
4/3/90	0.60	1,026	0.00167	1.714
4/10/90	0.25	1,022	0.00070	0.714
4/17/90	0.40	1,026	0.00111	1.143
4/24/90	0.30	1,022	0.00084	0.857
5/1/90	0.40	1,020	0.00112	1.143
5/8/90	0.25	1,034	0.00069	0.714
5/15/90	0.20	1,023	0.00056	0.571
6/5/90	0.45	1,020	0.00126	1.286
6/12/90	0.40	1,018	0.00112	1.143
6/19/90	0.70	1,017	0.00197	2.000
6/26/90	0.45	1,019	0.00126	1.286
7/3/90	0.55	1,022	0.00154	1.571
7/10/90	0.35	1,022	0.00098	1.000
7/17/90	0.45	1,021	0.00126	1.286
7/30/90	0.30	1,021	0.00084	0.857
8/7/90	0.50	1,024	0.00140	1.429
8/14/90	0.45	1,022	0.00126	1.286
8/21/90	0.40	1,022	0.00112	1.143
8/28/90	0.70	1,022	0.00196	2.000
9/4/90	0.55	1,029	0.00153	1.571
9/11/90	0.40	1,025	0.00111	1.143
9/18/90	0.45	1,026	0.00125	1.286
9/25/90	0.40	1,026	0.00111	1.143
10/2/90	0.45	1,029	0.00125	1.286
10/9/90	0.45	1,025	0.00125	1.286
10/16/90	0.70	1,028	0.00195	2.000
10/28/90	0.80	1,024	0.00223	2.286
Average:	0.43	1,024	0.00119	1.216
Maximum:	0.80	1,034	0.00223	2.286
Minimum:	0.05	1,017	0.00014	0.143
Std. Dev.	0.15	4	0.00042	0.427

Source: Florida Gas Transmission Company, 1990.

DELIVER
PICK-UP
SHIP
HOLD AT GATE

DELIVERY OR SHIPPING NOTICE

NO. \_\_\_\_\_  
 DATE 3/4/91  
 P.O. NO. \_\_\_\_\_  
 or REF. \_\_\_\_\_

TO:

Mr. Clair H. Fancy, P.E.  
 Central Air Permitting  
 Division of Air Regulation  
 Florida Department of  
 Environmental Regulation  
 2600 Blair Stone Road  
 Tallahassee, FL 32399-2400

- SHIPPER:
- THE WALT DISNEY COMPANY  
500 So. Buena Vista St., Burbank, CA 91521 • (818) 840-1000
  - WALT DISNEY PICTURES  
500 So. Buena Vista St., Burbank, CA 91521 • (818) 840-5151
  - WED ENTERPRISES, 1401 Flower St., Glendale, CA 91201 • (818) 956-6500
  - MAPO, 1400 Grand Central Ave., Glendale, CA 91201 • (818) 956-7300
  - WALT DISNEY TELECOMMUNICATIONS AND NON-THEATRICAL COMPANY  
500 So. Buena Vista St., Burbank, CA 91521 • (818) 840-1111
  - DISNEYLAND-VISTA RECORDS  
350 So. Buena Vista St., Burbank, CA 91521 • (818) 840-1000
  - BUENA VISTA DISTRIBUTION CO., INC.  
350 So. Buena Vista St., Burbank, CA 91521 • (818) 840-5000
  - WED ENTERPRISES  
6904 Tujunga Ave., North Hollywood, CA 91605 • (818) 956-6500
  - THE DISNEY CHANNEL, 4111 W. Alameda Ave., Burbank, CA 91505 • (818) 846-6661
  - WALT DISNEY WORLD CO.  
P. O. Box 10,000 Lake Buena Vista, FL 32830-1000 • (407) 824-2222
  - WALT DISNEY TELECOMMUNICATIONS AND NON-THEATRICAL COMPANY • WAREHOUSE  
4563 Colorado Blvd., Los Angeles, CA 90039 • (818) 956-3070
  - WALT DISNEY WORLD COMPANY • Park Printing  
7481 President's Drive, Orlando Central Park, Orlando, FL 32809
  - REEDY CREEK ENERGY SERVICES; 5300 N. Cast Dr.  
Lake Buena Vista, FL 32830 407-824-4952

VIA <u>Best Way</u>		SHIPPING CHARGES <input checked="" type="checkbox"/> Prepaid <input type="checkbox"/> Collect				
DATE REQUIRED AT DESTINATION <u>March 5, 1991</u>		ORIGIN	ACCOUNT		REVENUE AND COST CONTROL	
			CONTROL	SUB	DETAIL	
		6 19	3 1 3	5 3	0 0 J U 0 9 1 9 2 1	
ITEM	QUANTITY	DESCRIPTION OF ITEMS			INVENTORY ITEM CODE	VALUE
1	1	Letter; Orange County--AC 48-137740 (A) 48-170280 Gas Turbine and Heat Recovery Steam Generator with Duct Burner				
2	1	Letter; EPCOT Center Diesel Generators No.1 and No. 2				
NO. OF PIECES <u>2</u>		TOTAL WEIGHT			TOTAL VALUE \$	

REQUESTED BY: Fran Winchester

RECEIVED THE ABOVE GOODS IN SATISFACTORY CONDITION EXCEPT AS NOTED

DEPARTMENT: Engineering & Construction

AUTHORIZED BY: Edward Godwin

RECEIVED BY \_\_\_\_\_ DATE \_\_\_\_\_