

Florida Department of Environmental Regulation

Central District ● 3319 Maguire Boulevard, Suite 232 ● Orlando, Florida 32803-3767 ● 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary, Alex Alexander, Deputy Assistant Secretary

Permittee: Reedy Creek Improvement District P.O. Box 36 Lake Buena Vista, FL 32830

Attention: Thomas M. Moses

Director/ General Manager

I. D. Number:
Permit/Certification
Number: A048-170280
Date of Issue:

Expiration Date: 12/15/94

County: Orange Latitude/Longitude: 28°25'34"N/81°34'48"W

UTM: 17-442.0 KmE; 3139.0 KmN
Project: Gas Fired Turbine
Generator with Heat Recovery

System

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate a 30.8 MW GE LM5000 gas fired turbine generator system with a heat input capacity of 345 MMBTU/hr. The project includes an in-line duct burner, heat recovery boiler and steam turbine, at the Central Energy Plant. This source is located at Bay Lake, near Lake Buena Vista, Orange County, Florida.

General Conditions are attached to be distributed to the permittee only.

PERMITTEE:

Reedy Creek Improvement District

I. D. Number:

Permit/Certification Number:

A048-170280

Attention: Thomas M. Moses

Director/General Manager

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Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

1. The turbine may operate continuously (8760 hrs/yr).

- 2. Only natural gas shall be fired in the turbine and duct burner. No. 2 oil shall be used in periods of curtailed natural gas supply. The duration of oil firing shall not exceed 14 days annually.
- 3. The maximum heat input to the turbine and the duct burner combined shall not exceed 345 MMBTU/hr. (normal duct burner heat input rate of 23 MMBTU/hr).
- 4. 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.
- 5. The emissions, from the turbine and duct burner combined, shall not exceed:

	Gas Fir	ed	Oil Fir	\mathtt{ed}^{1}
Pollutant	<u>lb/hr.</u>	<u>TPY*</u>	1b/hr_	<u>TPY</u>
Nitrogen Oxides (NOX) peak @ 40°F	112		132	
average	77	337	100	17
Sulfur Dioxide (SO ₂)	0.2	0.8	118	20
Particulates (PM)	0.8	3.5	9	2
Carbon Monoxide (CO)	11	48	24	4
Volatile Organics (VOCs)	6	26	6	1
Visible Emissions (VE)	5% opac	ity	10% opa	
NOx, at 15% 02 dry basis peak	74 ppmv	•	82 ppmv	2
Average	58 ppmv	•	68 ppmv	
SO ₂ , at 15% oxygen dry basis	_		58 ppmv	

*TPY (tons per year)

- 1 Oil will be fired only when there is natural gas curtailment. It will be fired for no more than 14 days annually.
- Variation in concentration with variation in ambient air temperature documented by a plot of pollutant concentration versus ambient temperature, as per initial compliance test results.

PERMITTEE:

Reedy Creek Improvement District

Attention: Thomas M. Moses

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SPECIFIC CONDITIONS:

The average emissions will be calculated using hourly logged averages to obtain a 30 day average and then using 12 consecutive 30 day averages to obtain an annual average. The DER District Office may alter this averaging method after due consideration of alternative compliance plans.

The duct burner NOx emissions shall not exceed (corresponding to 0.2 1b/MMBTU) 4.6 1b/hr for gas or oil at 23 MMBTU heat input or 40 lbs/hr. for gas or oil at 198 MMBTU/hr.

- 6. The No. 2 oil sulfur content shall not exceed 0.4 percent.
- 7. 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.

For inventory purposes only, the emergency generator's expected emissions are listed below:

Pollutant	<u>lbs/year</u>
NOx	232
CO	36
VOC	9
PM	8
S0 ₂	30

- 8. Water injection shall be utilized for NOx control at a minimum of 0.55 water to fuel ratio. If compliance testing warrants this ratio to be re-investigated, the ratio at which compliance is maintained shall be incorporated into the permit.
- 9. Annual compliance testing conducted annually from the date of February 1, 1989 shall be conducted with the fuels used in the preceding 12 months period using:
 - 1. EPA Method 20 for NOx and SO2
 - 2. EPA Method 10 for CO
 - 🔁 3. EPA Method 5 for PM
 - 4. EPA Method 9 for VE

Other DER approved methods may be used for compliance testing only after prior Departmental approval.

PERMITTEE:

Reedy Creek Improvement District

keedy Creek improvement bistrict

Attention: Thomas M. Moses

Director/General Manager

I. D. Number:

Permit/Certification Number:

A048-170280

Date of Issue:

Expiration Date: 12/15/94

SPECIFIC CONDITIONS:

10. 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.
- 11. DER's District Office shall be notified in writing 15 days prior to source testing. Written reports of the tests shall be submitted to the district office within 45 days of test completion.
- 12. Any change in the method of operation, fuels, equipment or operating hours shall be submitted for approval to DER's District Office.
- 13. Each calendar year on or before March 1, submit for each source, an Annual Operations Report DER Form 17-1.202(6) for the preceding calendar year in accordance with Rule 17-4.14, F.A.C.
- 14. An operation permit renewal must be submitted at least 60 days prior to the expiration date of this permit (Rule 17-4.09, F.A.C.).

TSSUED

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

608

/ Alexander

Deputy Assistant Secretary 3319 Maguire Boulevard

Suite 232

Orlando, Florida 32803

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4 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 services 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)		
3. Article Addressed to:	4. Article Number	
Mr. Thomas M. Moses	P 938 762 762	
Reedy Creek Improvement District	Type of Service:	
P. O. Box 10170	Registered Insured	
Lake Buena Vista, FL 32830-0170	XCertified COD Express Mail Return Receipt for Merchandise	
	Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature — Address	8. Addressee's Address (ONLY if	
X	requested and fee paid)	
6. Signature - Agent	⊣ ু≱	
× / Christian		
7. Date of Delivery		

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PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT

P 938 768 768

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED

NOT FOR INTERNATIONAL MAIL (See Reverse)

	Mr. Thomas M. Mose	≥s,	RCID
	Lake Buena Vista,	FL	32830
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	TOTAL Postage and Fees	3	
	Postmark or Date Mailed: 11-27-89 Permit: AC 48-137	7740)



Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 52399-2400 Bob Martinez, Governor Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 13, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Moses:

RCID Cogeneration Plant Permit Extension

AC 48-137740

The Department has reviewed your request for the extension of the expiration date for the above mentioned permit and agrees with your request. The following shall be changed and added to the permit:

Change Expiration Date

From: November 1, 1989

To: May 1, 1990

Attachment to be Added

RCID letter received November 1, 1989.

This letter must be attached to the above mentioned permit and shall become a part of that permit.

Sincerely,

Dale Twachtmann

Secretary

DT/plm

C. Collins, Central District

H. Culp, P.E.





	For Routing To Other Than The Addressee		
To:		Location:	
Ta:		Location:	
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DEPARTMENT/OF ENVIRONMENTAL REGULATION

Interoffice Memorandun Please call patty asams when signed when signed

Dale Twachtmann TO:

Steve Smallwood FROM:

DATE: November 13, 1989

Permit Expiration Date Extension SUBJ:

Reedy Creek Improvement District

AC 48-137740

Attached for your approval and signature is a permit expiration date extension, for the Reedy Creek Cogeneration project, prepared by the Bureau of Air Regulation.

I recommend your approval and signature.

Attachment

SS/PR/plm

erse side. Failure to do this will prevent this provide you the name of the person delivered ag services are available. Consult postmaster sted. ddress. 2. Restricted Delivery (Extra charge)
4. Article Number
P 938 762 573
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NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL (See Reverse)

	Sent to Mr. Thomas M. Mose	<u>s,</u>	RCID
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	Return Receipt showing to whom and Date Delivered		
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3800	Postmark or Date		
PS Form 3800, June 1985	Permit: AC 48-1377 Mailed: 5-24-89	740	

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PART # 112676 REV, 10/88 WCSC 1988 Federal Express Curporation 189

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From

Ship Date

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FL 32830

CLAIR H. FANCY FL. DEFT.OF ENVIRONMENTAL 2600 BLAIR STONE RO. TALLAHASSEE FL 32301

Release No.

Heference Info

SERVICE 1 PROMETY 2 COMMETAN 3 COMMETAN 4 COMMETAN 5 STANDARD 6 DEFINITION 1 THE TENTON 1 THE TE





31 October, 1989

RECEIVED

Mr. Clair H. Fancy Bureau Chief - Air Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, FL 32301-2400 MOY 2 1989

DER - BAQM

RE: RCID Cogeneration Plant

Gas Fired Turbine Generator

Construction Permit AC48-137740

Dear Mr. Fancy:

The construction permit for the RCID Cogeneration Plant expires November 1, 1989. It appears that the Operational Permit #A048-170280 will not be issued by your department prior to the expiration of the construction permit. Therefore, we respectfully request an extension of Construction Permit #AC48-137740 for six months, the extension to expire May 1, 1990.

If you have any additional questions or comments, please let us know as soon as possible. Thank you for your assistance in this project and we look forward to receiving our final operating permit.

Very Bruly yours Mills

Thomas M. Moses

District Administrator

TMM: fw



Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

May 17, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas M. Moses Reedy Creek Improvement District Post Office Box 36 Lake Buena Vista, Florida 32830

Dear Mr. Moses:

Re: Extension of Expiration Date, RCID Cogeneration Plant, AC 48-137740

The Department has received and reviewed your request dated April 27, 1989, for an extension of the expiration date of the above referenced permit.

The Department is in agreement with your request. The following shall be changed and added to the permit:

Expiration Date Change:

From: June 1, 1989

To: November 1, 1989

Attachment to be Added:

RCID letter dated April 27, 1989.

This letter must be attached to your construction permit, AC 48-137740, and shall become a part of the permit.

Sincerely

Dale Twachtmann

Secretary

DT/PR/plm

cc: C. Collins, CF District

W. Aronson, EPA

M. Flores, NPS



State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

DECEIVE

MAY 16 1989

TO: Dale Twachtmann

FROM: Steve Smallwood

Office of the Secretary

SUBJ: Approval of Permit Extension for Reedy Creek

Improvement District Cogeneration Plant, AC 48-137740

DATE: May 15, 1989

Attached for your approval and signature is a permit extension prepared by Central Air Permitting for the above mentioned company to allow for the retesting of the gas turbine with the duct burner in low fire mode.

I recommend your approval and signature.

SS/PR/s

Attachments

RECEIVED.

-LIC-BAQM



State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
ъ	Location:
To:	Location:
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From:	Oate

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Steve Smallwood

Approval of Permit Extension for Reedy Creek SUBJ:

Improvement District Cogeneration Plant, AC 48-137740

DATE: May 15, 1989

Attached for your approval and signature is a permit extension prepared by Central Air Permitting for the above mentioned company to allow for the retesting of the gas turbine with the duct burner in low fire mode.

I recommend your approval and signature.

SS/PR/s

Attachments

Patty-

this must upstairs 5/16 Clam



P.O. BOX 36 LAKE BUENA VISTA, FLORIDA 32830





Mr. C.H. Fancy, PE
Deputy Chief
Bureau of Air Quality Management
FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION
2600 Blair Stone Road
Tallahassee, FL 32399-2400

P.M 5-8-67 Delands, FL fell deply



DIRECTOR/GENERAL MANAGER
Thomas M. Moses

EIVED

MAY 5 1989

DER-BAQM

April 27, 1989

Mr. C.H. Fancy, PE Deputy Chief Bureau of Air Quality Management Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, Florida 32399-2400

RE: RCID Cogeneration Plant

Gas Fired Turbine Generator Construction Permit

Extension Request AC 48-137740

Dear Mr. Fancy:

Pursuant to our records, the above noted Permit will expire on June 1, 1989.

After field construction was substantially completed, we conducted emission compliance testing on the unit and forwarded our Source Test Report to Mr. Collins of your Orlando office on March 14, 1989.

One facet of the extended testing indicated possible non-compliance (duct burner operation on low-fire mode) and the Orlando office suggested this part of the testing be redone. While obtaining new test pricing for this work, the 12,000 hp steam turbine mechanically failed and is now under extended repair. While this part of the plant is out of service we cannot effectively re-test our duct burner emissions. Thus, it does not appear we will be able to file a Certificate of Completion, Operating Permit Application, and renewed test results 90 days prior to the current expiration date of the existing Construction Permit.

As of now we hope to re-test in late May or early June and be able to submit the results in July. Assuming no additional mechanical or performance problems, it is our intention to file an Operating Permit Application shortly thereafter.

The 90 day advance submission period needed prior to expiration of the construction Permit (Rules 17-2 and 17-4, FAC) indicates a date of November 1, 1989. Therefore, we hereby request that the Bureau approve an additional five (5) month extension of our construction Permit to allow completion of our requirements by November 1, 1989.

We appreciate your interest in behalf of this project, and your specific concern. Please contact us if you have questions.

Yours very truly,

Thomas M. Moses

Director/General Manager

TMM/dh

CC:

Charles Collins

CF District

Florida DER, Orlando

copied P. Raval CHF/BT

SENDER: Complete items 1 and 2 when additional and 4. Put your address in the "RETURN TO" Space on the revicerd from being returned to you. The return receipt feed delivered to and the date of delivery. For additional fees postmaster for fees and check box(es) for additional service 1. AD Show to whom delivered, date, and addressee's addre	erse side. Failure to do this will prevent this will provide you the name of the person the following services are available. Consult (s) requested.
3. Article Addressed to:	4. Article Number
Mr. Thomas M. Moses	P 274 007 458
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	Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature – Addressee	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature – Agent X	
7. Date of Delivery 9-24-81	
PS Form 3811, Mar. 1987 * U.S.G.P.O. 1987-178-268	DOMESTIC REJURN RECEIPT

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P 274 007 458

RECEIPT FOR CERTIFIED MAIL
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NOT FOR INTERNATIONAL MAIL

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Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Sectetary

September 14, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas M. Moses Reedy Creek Improvement District Post Office Box 36 Lake Buena Vista, Florida 32830

Dear Mr. Moses:

Re: Extension of Expiration Date, RCID Cogeneration Plant, AC 48-137740

The Department has received and reviewed your request dated August 23, 1988, for an extension of the expiration date of the above referenced permit.

The Department is in agreement with your request. The following shall be changed and added to the permit:

Expiration Date Change:

From: December 1, 1988

To: June 1, 1989

Attachment to be Added:

11. RCID letter dated August 23, 1988.

This letter must be attached to your construction permit, AC 48-137740, and shall become a part of the permit.

Sincerely,

Dale Twachtmann

Secretary

DT/ks

cc: C. Collins, CF District

W. Aronson, EPA

M. Flores, NPS



State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Th	an The Addressee
то	Location:
То	_ Location
To	Location
From:	Date:

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Steve Smallwood

SUBJ: Extension of Expiration Date

Reedy Creek Improvement District Cogeneration Plant

Permit No. AC 48-137740

DATE: September 14, 1988

Attached for your approval and signature is a letter prepared by Central Air Permitting to extend expiration date of the construction permit issued to the above mentioned company for a cogeneration plant. The facility is located in Orange County, Florida.

I recommend your approval and signature.

SS/PR/s

attachments



P.O. BOX 36 LAKE BUENA VISTA, FLORIDA 32830









Mr. C.H. Fancy, PE
Deputy Chief
Bureau of Air Quality Management
Florida Dept. of Env. Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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file topy

PM 6-23-88 Orlando, FL



DIRECTOR/GENERAL MANAGER
Thomas M. Moses

RECEIVED

AUG 26 1988

August 23, 1988

DER - BAQM

Mr. C. H. Fancy, PE
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

RCID Cogeneration Plant Gas Fired Turbine Generator Permit Application Extension Request AC 48-137740

Dear Mr. Fancy:

As your files will indicate, the above cited Construction Permit will expire on December 1, 1988.

Although the construction phase is well underway it does not appear we will be able to file a Certificate of Completion, Operation Permit Application and related testing results 90 days prior to the expiration date of the current Construction Permit.

We expect start-up to occur in early November 1988 with compliance testing later that month. Assuming no mechanical or performance problems ensue, we'd expect test data results and completion activities to occur in December. With onset of the holidays and leaving some margin for operational shake-down needs for this 38 MW facility, it appears that our Operating Permit Application submittal will occur in January, 1989.

Noting the 90 day advance submission period needed prior to expiration of the Construction Permit (Rules 17-2 and 17-4, FAC) brings us to a date of May 1, 1989. Therefore, we formally request that the Bureau approve this request for a five (5) month extension of our Construction Permit allowing us to complete our activities by May 1, 1989.

Your attention to this matter is sincerely appreciated. Please contact us if you have any questions.

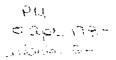
nohous

Thomas M. Moses

Director/General Manager

TMM:dh

copied: Prader Raval
Chuck Collins, CF Dist.
Asyne avonson, EPA
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CHF/BT





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

APR 0 5 1988

345 COURTLAND STREET ATLANTA, GEORGIA 30365

4APT-APB

RECEIVED

year set

APR 7 1988

DER-BAQM

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

Re: Reedy Creek (PSD-FL-123)

Dear Mr. Fancy:

This is to acknowledge receipt of your final determination and permit for the Reedy Creek Improvement District. We have reviewed your determination and permit and determined the documents to be satisfactory.

Thank you for the opportunity to provide you with our input. If you have any additional comment or information, please feel free to contact me or Gary Ng of my staff at (404) 347-2864.

Sincerely yours,

Proce P. Miller Bruce P. Miller, Chief

Air Programs Branch Air, Pesticides, and Toxics Management Division

Copusi CHF/67 (4-8-8800)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

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

Regulation Regulation Page 1888

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State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

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

MEMORANDUM

TO: Bill Thomas

FROM: Vivian F. Garfein

DATE: March 10, 1988

RE: OGC Case No. 87-1624

Permit Application No. 48-137740

On December 3, 1987, REEDY CREEK IMPROVEMENT DISTRICT was granted an extension of time until February 8, 1988, in which to file a petition for administrative proceedings concerning the above captioned case. No petition was filed within the allotted extension of time.

If you have not already done so, please have a final order prepared as soon as possible which appropriately disposes of the permit application so that our file in the case can be closed. Please send me a copy of the final order, or, if the permit application has been withdrawn, a letter confirming the withdrawal date.

Please call if there are any questions.

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DEPARTMENT OF ENVIRONMENT	TAL REC	SULATION
ROUTING AND		ACTION NO
1. TO: "(NAME, OFFICE, LOCATION)	199	ACTION GUE DATE
Bill Thomas		Initial Date
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