



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kennard F. Kosky, P.E.  
KBN Engineering & Applied Sciences, Inc.  
1034 N.W. 57th Street  
Gainesville, Florida 32605

Re: Request for Construction Permit Amendments  
Orlando CoGen (I), Inc.  
AC 48-206720/PSD-FL-184

Dear Mr. Kosky:

The Department has reviewed your requests as outlined in the December 12, 1994 meeting with the Department. The following is a synopsis of the Department's decisions concerning your requests:

1. Clarify that the ISO correction is required only to determine compliance with NSPS NO<sub>x</sub> limit.

The Department agrees with the changes as it relates to the ISO correction for determining compliance with the NSPS standard. Specific Condition 10 will be changed to reflect that. The Department does not agree in making that requirement only for the initial test, but for all annual performance tests, as specified in that condition presently for showing annual compliance with the standard.

2. Revise the CT/Db limit for PM.

The Department will reconsider this issue after the initial performance test is performed, as required by the construction permit, and the test report is submitted to the Bureau of Air Regulation. The testing should be performed simultaneously at both the combustion turbine (CT) outlet and the heat recovery steam generator (HRSG) stack to determine compliance with the Db limits. The Department will agree to change Specific

Mr. Kennard F. Kosky  
Letter Addressing Request for Construction Permit Amendments  
Orlando CoGen (I), Inc.  
AC 48-206720; PSD-FL-184  
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Conditions 7a and 8 to include EPA Method 17 as an alternate method for determining PM emissions. Also, the PM emissions test will be required only on an initial basis, and thereafter only if the opacity exceeds 10% and at permit renewal time. The VE test will be required annually.

3. Revise the CT/Db limits for CO and VOC.

The Department will reconsider this issue after the initial performance test is performed, as required by the construction permit, and the test report is submitted to the Bureau of Air Regulation. The testing should be performed simultaneously at both the CT outlet and the HRSG stack to determine compliance with the Db limits. Compliance with the CO limitation is, by Specific Condition 9 of the permit, an acceptable surrogate method for determining compliance with the VOC emission.

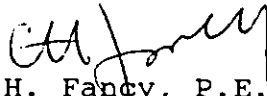
4. The initial NO<sub>x</sub> compliance is to be demonstrated using EPA Method 20 and, afterwards, NO<sub>x</sub> compliance is to be demonstrated using a CEM; and, annual NO<sub>x</sub> tests not be required.

The Department does not agree with this request because of reasons specified in our previous correspondence of July 8, 1994. 40 CFR 60.8(a) requires the owner or operator to perform an initial performance test; but, it also requires the owner to perform testing at such other times as directed by the Administrator. The Department will reconsider this issue after the initial performance test is performed, as required by the construction permit, and the test report is submitted to the Bureau of Air Regulation. The testing should be performed simultaneously at both the CT outlet and the HRSG stack to determine compliance with the Db limits. If it is determined that the initial Db (i.e., the HRSG) compliance test for the NO<sub>x</sub> emissions is demonstrated in accordance with the permit requirements, then the Department will consider changing the annual NO<sub>x</sub> compliance testing requirement to once every five years for permit renewal pursuant to Rule 62-297.340(1)(d), F.A.C. The requirement of demonstrating initial and annual NO<sub>x</sub> compliance using EPA Method 20 is standard for similar facilities subject to 40 CFR 60, Subpart GG. Since the NO<sub>x</sub> CT emissions are greater than 100 TPY, annual EPA Method 20 testing will be required.

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The Department will issue a permit amendment on requests that the Department concurred with in the meeting. If there are any questions on the above, please call Syed Arif at (904) 488-1344 or write to me at the above address.

Sincerely,



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

CHF/SA/bjb

cc: C. Collins, CD  
J. Harper, EPA  
J. Bunyak, NPS  
D. Nester, OCEPD  
T. Hess, Orlando CoGen (I), Inc.

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3. Article Addressed to:  Mr. Kennard F. Kosky, P.E. KBN Engineering & Applied Sciences, Inc. 1034 N.W. 57th Street Gainesville, Florida 32605		4a. Article Number Z 392 940 716	
		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	
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PS Form 3800, March 1993

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Gainesville, FL 32605	
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# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 14, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kennard F. Kosky, P.E.  
KBN Engineering & Applied Sciences, Inc.  
1034 N.W. 57th Street  
Gainesville, Florida 32605

Re: Amendment of Construction Permit  
Orlando CoGen (I), Inc.  
AC48-206720; PSD-FL-184

Dear Mr. Kosky:

The Department is in receipt of your letter dated October 10, 1994, requesting reconsideration of the amendment request, and deletion of NSPS ISO correction requirement for NO<sub>x</sub> for the above referenced source.

The EPA letter of June 3, 1994 is correct in stating that the emissions limitations must be independently verified for the combustion turbine (CT) and the duct burner (DB) because such limitations result from the applicability of 40 CFR 60, Subparts GG and Db. It follows that PM/PM<sub>10</sub> and CO must be evaluated in the same manner, since the CT and DB are separate emission units subject to independent emission standards which were established by the BACT determination of August 17, 1992 (date of issuance of the Final Determination). Approval of a combined emission limit for two independent emission units would constitute a "bubble", requiring a SIP revision and EPA approval. Compliance with the CO limitation, is by specific condition 9 of the permit, an acceptable surrogate method for determining compliance with the VOC emission.


Additionally, specific condition 18 of the permit required the source to comply with the Stationary Point Source Emission Test Procedures of Rule 17-2.700, requiring the source to provide sampling ports for proper stack sampling for both CT and the DB. Therefore, in order to achieve compliance with the construction permit, the applicant knew or had reason to know that sampling ports with minimum requirements for testing were needed during the engineering phase of the project. Failure to engineer and construct the unit to provide for such testing is not considered grounds for revising the permit, even if bubbling were allowed.

Mr. Kennard F. Kosky, P.E.  
November 14, 1994  
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Specific Condition 10 of the permit requires correcting performance test data to ISO conditions. This is a NSPS requirement, and cannot be deleted.

Any further request for an extension to file a petition will not be granted. If there are any questions on the above, please call Syed Arif at (904) 488-1344, or write to me at the above address.

Sincerely,

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

cc: T. Hess, Orlando CoGen (I), Inc.  
J. Harper, EPA  
C. Collins, CFD  
D. Nester, Orange County

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3. Article Addressed to:  
 Ken Kosky, P.E.  
 KBN Engineering & Applied  
 Sciences, Inc.  
 6241 NW 23rd St.  
 Gainesville, FL 32605

4a. Article Number  
 P 872 562 682

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PS Form 3800, JUNE 1991