



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 23, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. A. K. Sharma  
Director of Power Supply  
Kissimmee Utility Authority  
1701 West Carroll Street  
Kissimmee, FL 34741

Dear Mr. Sharma:

Re: Permit No. AC49-205703 / PSD-FL-182  
ASTM Test Method for Fuel Oil Sulfur Content  
PM<sub>10</sub> Limit in Table 2

The Department has evaluated your recent request to amend the above referenced permit for the 40 MW simple cycle and 120 MW combined cycle combustion turbines. You requested to use the most recent version of the ASTM method for fuel sulfur content from fuel oils. The Department hereby grants this request to use ASTM D2880-94 for fuel oil sulfur content in place of ASTM D2880-71 which is referenced in 40 CFR 60 Subpart GG. The EPA is currently in the process of revising/ updating this subpart and will likely update the reference to this ASTM method. The limits for particulate matter smaller than 10 micrometers (PM<sub>10</sub>) contained in Table 2 of the above referenced permit are listed to three significant figures. The Department hereby reduces the number of significant figures as shown below:

Table 2:

FROM:

PM10 Gas 0.0100 lb/MMBtu

TO:

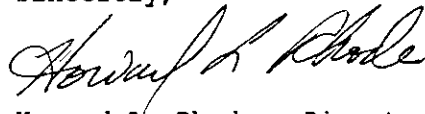
PM10 Gas 0.010 lb/MMBtu

This change should avoid the need to retest the combined cycle unit for particulate matter due to the recent test results which averaged 0.0104 lb/MMBtu for particulate matter (PM) by EPA Method 5 (which includes PM<sub>10</sub>). It was noted that the sample filters were loaded with particles which were larger than those expected for combustion of natural gas. Also, an oily residue was detected on some of these filters. The last run of this test yielded 0.0035 lb/MMBtu for PM. This last run may be most representative of the steady state PM emissions from this unit fired on natural gas. Best Available Control

Technology for particulate matter on this unit was based on combustion controls and the use of clean fuels.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC49-205703 / PSD-FL-182.

Sincerely,



Howard L. Rhodes, Director  
Division of Air Resources  
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **PERMIT AMENDMENT** and all copies were mailed by certified mail before the close of business on 2-27-96 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to  
120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

Kuni Joken 2-27-96  
Clerk Date

Copies to be furnished to:

L. Kozlov, SED  
Jewell Harper, EPA

Memorandum

Florida Department of  
Environmental Protection

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TO: Clair Fancy

FROM: Martin Costello

DATE: February 23, 1996

RE: Cane Island Permit Amendment

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Attached for your review and approval, is a permit amendment to allow Kissimmee Utility Authority to use the most recent version of an ASTM test method instead of the method referenced in Subpart GG which is outdated. The request for this change is attached.

This action also reduces the number of significant figures for the PM standard when the combustion turbine fires gas. The original standard was specified to three significant figures. The Central District requested this change to avoid the need to require a retest for PM on this unit.

Is your RETURN ADDRESS completed on the reverse:

- 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.

following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee

3. Article Addressed to:  
*A. K. Sharma*  
*Director of Power Supply*  
*Kissimmee Utility Auth.*  
*1701 W. Carroll St.*  
*Kissimmee, FL 34741*

5. Signature (Addressee)  
*A. K. Sharma*

6. Signature (Agent)  
*Catherine Mickel*

4a. Article Number  
**2 127 633 174**

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
**3-1-96**

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

2 127 633 174

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

To: <i>A. K. Sharma</i>	
Address: <i>Kissimmee U.A.</i>	
State and ZIP Code: <i>Kissimmee, FL</i>	
Postage	S
Certification Fee	
Special Delivery Fee	
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Return Receipt Showing to Whom Delivered & Date	
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TOTAL Postage & Fees	S
Postmaster's Code	<i>2-37-96</i>
<i>AC 49-205703</i>	
<i>PSD-FL-182</i>	

PS Form 3800, March 1993