

Department of Environmental Protection PERIGEE TECHNICAL

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SERVICES, INC.

Virginia B. Wetherell Secretary

Lawton Chiles Governor

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

January 21, 1997

Mr. Jerome J. Guidry, P.E. President Perigee Technical Services, Inc. 6658 The Landings Drive Orlando, Florida 32812-3528

RE: Kissimmee Utility Authority

Dear Mr. Guidry:

The Emissions Monitoring Section has reviewed your November 29 letter concerning Kissimmee Utility Authority's request to use nitrogen oxide emissions data collected during its annual RATA to demonstrate compliance with its emission standard. Pursuant to the conditions stated in the letter, it does not appear that the proposed procedure would substantially depart from the requirements of either 40 CFR 60 or 40 CFR 75. Therefore, we do not believe that approval of an alternate sampling procedure would be required in this specific case.

If you have any questions, please contact Amy Hulbert at 904/488-6140, or write to me.

FOR

M. D. Harley, P.E., DEE

P.E. Administrator

Sincerely.

Emissions Monitoring Section

Bureau of Air Monitoring and Mobile Sources

MDH:adh

cc: Len Kozlov, Central District

Environmental Radiation Studies Environmental Impact Studies Radiation Dose Modeling Risk Assessment



Atmospheric Dispersion Modeling
Air Pollution Permitting
Landscape Design
Graphic Arts

November 29, 1996

Mr. Mike Harley
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re:

Kissimmee Utility Authority - Cane Island Facility

Permit Number: AC49-205703

Use of RATA test data for compliance purposes

Dear Mr. Harley:

As we discussed on Tuesday, Kissimmee Utility Authority wishes to use nitrogen oxide emissions data collected as part of their annual RATA testing requirement for the purpose of demonstrating compliance with their NOx emission standard. We understand that this is allowed by federal rules and FDEP policy and we wish to pursue this possibility as part of the pending request to modify the testing requirements of this permit.

The 20-30 minute tests conducted for the RATA testing will be strung together in a manner that fulfills additional requirements of EPA Methods 10 and 20 as to test run time and O_2 stratification investigation. The collected data will be bias corrected to comply with the RATA requirements, but will not be bias corrected for compliance with NSPS. No less than eight test points will be used for the RATA testing. Essentially, the testing will be done by EPA method 20 and the data will simply be reported differently to comply with the two separate requirements.

Please advise us if this request is acceptable to you and if it will require approval of an alternate sampling procedure so that we may complete the pending modification request for this permit. Thank you for your help in this matter. Please call me at (407) 859-7374 or Steve Neck at (352) 335-1889 if you have any questions.

Very truly yours,

PERIGEE TECHNICAL SERVICES, INC.

Jerome 🖟 Guidry, P.E., Q.E.P.

President

JJG:emc

cc: Steve Neck

Jeff Ling A. K. Sharma Gary Kuberski

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Department of Environmental Protection

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

July 22, 1998

Virginia B. Wetherell Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0970043-005-AC (PSD-FL-182)

Cane Island Facility - Unit 1 - Request for Permit Modification

Your letter of June 22, 1998

Dear Mr. Sharma:

The Department has reviewed Kissimmee Utility Authority's (KUA) letter dated June 22, 1998, in response of the Department's letter dated April 16, 1998. Based on our review of the June 22 letter and considering your response to Question 1 of this letter, we have decided, before taking Department action in your request, to wait until the final results of the 1998 dual performance tests of the LM6000PD machine are available. Please submit these GE test results as soon as they are available to you.

We will continue evaluating the additional information provided to us by G.E on its presentation of July 9, 1998 and the KUA information dated April 15, 1998. As of today, your application remains incomplete. If you have any questions regarding this matter, please contact Ms. Teresa Heron at (850)921-9529.

Sincerely,

A. A. Linero, P.E.

Administrator

New Source Review Section

AAL/th/t

cc: Mr. Jeff Ling, KUA

Ms. Amy Carlson, B & V

Mr. Brian Beals, EPA

Mr. John Bunyak, NPS

Mr. Len Kozlov, CD

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