

July 25, 1997

Mr. Scott M. Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RECEIVED**

AUG 04 1997

BUREAU OF  
AIR REGULATION

Re: DRAFT Title V Permit No.: 1050217-001-AV  
Mulberry Cogeneration Facility

Dear Mr. Sheplak:

I am writing as a follow-up to a conversation I had with Mr. Lennon Anderson of your office earlier this week. Mr. Anderson and I discussed several errors in Table 1-1 of the Draft Title V Air Operating Permit for the Mulberry Cogeneration Facility. I have listed the comments that I provided to Mr. Anderson, as well as some additional comments, below:

1. Section III.C.12 should include "VOC: EPA Method 25A."
2. Table 1-1, page 2 of 2 has some typographical errors. In the column titled "Standrad(s)" the standards for NO<sub>x</sub>, VOC and CO should be "@ 15% O<sub>2</sub>," the table currently reads "@ 15." In addition, the limit for NO<sub>x</sub> while firing natural gas should be 15 ppmvd @ 15 % O<sub>2</sub>; and while firing No. 2 Oil should be 42 ppmvd @ 15 % O<sub>2</sub>. The limit for VOC should be 10 ppmvd @ 15 % O<sub>2</sub>. It appears that a number of the errors listed above could be due to the column width being too narrow to accommodate all of the text.
3. Table 1-1, page 2 of 2 cites the incorrect permit condition in the "See permit condition(s)" column. These citations appear to be numbered incorrectly. For example, the reference to Section III.A.5. should be to A.6.
4. Table 2-1 in the "Testing Time Frequency" column for SO<sub>2</sub> while firing natural gas references the No. 2 Oil schedule. It should reference the custom fuel monitoring plan or state twice per year, which is the current testing frequency. Also, under the "See permit condition(s)" column, the reference should be to III.A.18 and 25, not III.A.13.
5. Table 2-1 references III.A.13., in the "See permit condition(s)" column for SO<sub>2</sub> when firing No. 2 Oil. The reference should be to III.A.19.
6. Table 2-1 references III.A.16. in the "See permit condition(s)" column for VOC. The reference should be to III.A.21.
7. Table 2-1 references III.C.13 in the "See permit condition(s)" column for all but one row. The reference should be to III.C.12.
8. Table 2-1 indicates page 1 of 2. There was not a page 2 of 2 included in the packet I received.
9. All of the permit limits appear to be consistent with the limits which are scheduled to take effect in 1998 under the construction air permit. If this Draft Title V air permit becomes effective prior to 1998 the 1997 emissions limits should be included.

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Page Two

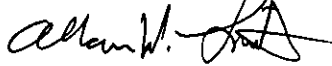
I hope these comments will help you in drafting the Final Title V Air Operating Permit for the Mulberry Cogeneration Facility. Please call me at 941-682-6338 with any questions or if you want to discuss these comments.

Sincerely,

Polk Power Partners, L.P.

by Polk Power GP, Inc.

its general partner



Allan Wade Smith

General Manager

cc: - - Dennis Oehring - CSWE Operations -

8/5/97

Scott Sheplak

Lennon Anderson