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 Mr. Don WALTERS, PLANT MANAGER
 Mulberry Cogeneration Facility
 Post Office Box 824
 City, State, ZIP+4
 Bartow, Florida 33831-0824

PS Form 3800, May 2000 See Reverse for Instructions

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1 Article Addressed to:
 Mr. Don Walters, Plant Manager
 Mulberry Cogeneration Facility
 SW Energy, Inc.
 3600 Highway 555
 Post Office Box 824
 Bartow, Florida 33831-0824

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Zoraida Colon Agent Addressee

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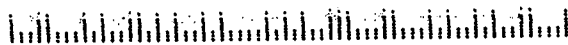
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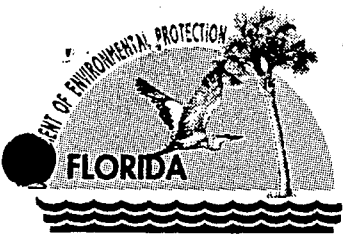
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SEP 02 2004

BUREAU OF AIR REGULATION

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400





Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

August 26, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Don Walters
Plant Manager
Mulberry Cogeneration Facility
CSW Energy, Inc.
3600 Highway 555
P. O. Box 824
Bartow, FL 33831-0824

Re: Mulberry Cogeneration Facility Request to Perform Engineering Studies:
Request for Additional Information
Permit 1050217

Dear Mr. Walters,

On August 23, 2004, the Department received your request for permission to conduct engineering studies of the newly rebuilt combustion turbine (CT). Additional information is needed so that we may begin evaluating your request. Specifically, the following information is needed:

1. Manufacturer information on the previous configuration of the CT showing expected fuel consumption, heat input, operating temperatures and emissions.
2. Manufacturer information on the rebuilt configuration of the CT showing expected fuel consumption, heat input, operating temperatures and emissions.

This information needs to be submitted under the signature of the responsible official and the seal of the professional engineer.

Please submit all requested information to Jim Pennington at the Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If you have any questions regarding this request for additional information, please contact him by e-mail at jim.pennington@dep.state.fl.us or by phone at (850) 921-9515.

Sincerely,

Trina L. Vielhauer
Chief, Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD
Shelia Snyder, FDEP-SWD
Darrel J. Graziani., P.E., Southern Environmental Sciences, Inc.

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CSW Energy, Inc.

A Central and South West Company
Mulberry Cogeneration Facility
Post Office Box 824
3600 Hwy. 555
Bartow, Florida 33831-0824

Telephone (863) 533-9073
Facsimile (863) 533-4092

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AUG 23 2004

BUREAU OF AIR REGULATION

August 18, 2004

Ms. Trina Vielhauer
Bureau Chief
Bureau of Air Regulation
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Mulberry Cogeneration Facility
ARMS ID No.: 1050217
Request to Perform Engineering Studies

Dear Ms. Vielhauer,

On behalf of the Mulberry Cogeneration Facility, I am requesting authorization to perform several engineering studies on the combustion turbine (CT) located at the above facility. The studies will evaluate the feasibility of increasing the combustor temperature from the current levels to 2055 °F. The studies will also evaluate the potential impacts on emissions and fuel consumption associated with firing at the higher temperature.

For your information, this request follows a recent forced outage that resulted from the catastrophic failure of the CT. Prior to the failure we had begun looking at replacement parts for the hot gas section of the CT. Based on discussions with the CT manufacturer (GE) we were advised that the original parts were no longer being manufactured and that the current replacement parts were of a different metallurgy but would meet our needs. As a result, the repairs to the CT included the purchase and installation of the replacement parts from the original equipment manufacturer that are of the new metallurgy but functionally equivalent.

Please note that the installation of the replacement parts has not caused or required us to operate the CT at the higher temperature and we continue to operate the CT with our permit limits. However, we are considering operating the unit at the higher temperature based on statements from GE that included increased power output from a slight increase in fuel consumption (4%) with no increase in emissions.

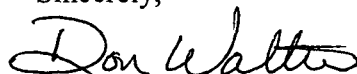
Because of the potential permitting issues associated with both the repairs and increasing the combustor temperature, we hired Mr. Darrel J. Graziani, P.E. of Southern Environmental Sciences, Inc.. As part of his evaluation Mr. Graziani had informal conversations with members of your staff before the forced outage and has prepared his report to us based on these conversations and the existing and new regulations. Based on his findings, Mr. Graziani noted the following:

- The replacement activities meet the exclusion criteria of the recently promulgated Routine Maintenance, Repair and Replacement regulations based on costs of less than 20% of a new process unit and the fact that we are operating the CT at the normal combustor temperature.
- Raising the combustor temperature would require a permitting action if GE's statements are correct related to the fuel consumption which would need to be increased. The current permits contain limitations on fuel usage that in effect constrain emissions.

Because of the uncertainty related to the GE statements, we would like to conduct several engineering studies to determine the potential impacts of increasing the combustor temperature. Based on these results, we would then be able to better evaluate impacts on fuel consumption, emissions and permitting needs. For scheduling purposes, we would like a thirty (30) day window to conduct the studies and will coordinate our activities locally with the District Office's compliance staff. This coordination would include verbal notifications on the days studies were being performed. If the final decision is to increase the combustor temperature, the results of the studies will be presented in the form of a permit application, if needed.

Should you have any questions please feel free to contact me at 863-533-9073.

Sincerely,



Don Walters
Plant Manager

cc: G. Kessel, P.E., FDEP SW District Office



**CSW Energy, Inc.
Operations**

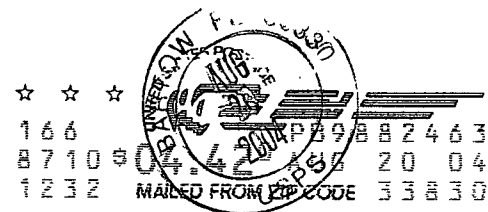
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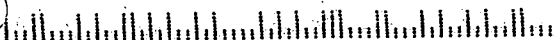


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Ms. Trina Vielhauer
Bureau Chief
Bureau of Air Regulation
Division of Air Resouce Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

32399+2400 01



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