

RECEIVED

SEP 3 1993

Hopping, Boyd  
Green & Sams

TO: District Air Program Administrators  
Local Air Program Administrators  
Bureau of Air Regulation Engineers

FROM: Howard L. Rhodes, Director *HLR*  
Division of Air Resources Management

DATE: August 30, 1993

SUBJ: Guidance on Rate of Operation During Compliance Testing

Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

If a source tests at less than capacity, the source should be notified of the limited capacity, however, the permit should not be changed to reflect the reduced loading. The above paragraph should be used as a condition in all construction and operating permits where capacity is a permit limitation.

This guidance will be incorporated into Rule 17-297 at the next update.

HLR/CHF/kt

8-31-93

File w/Apple  
JH

OP signed this  
a.m.; therefore, no  
need to extend  
Exp. Date.



LEGAL DEPARTMENT  
POST OFFICE BOX 14042  
ST. PETERSBURG, FL 33733  
Telecopier: (813) 866-4931

# TELECOPY TRANSMITTAL SHEET

DATE: August 31, 1993

TIME: \_\_\_\_\_

TO: Mr. John C. Brown

TELECOPIER NO.: (904) 922-6979

ORGANIZATION, DEPARTMENT, AND/OR LOCATION:  
Florida Department of Environmental Protection

FROM: GERALD A. WILLIAMS

TELEPHONE NO.: (813) 866-5186

Re: Extension Request of Construction Permit AC 64-191015

MESSAGE: Although FPC records show a confirmation of a fax transmittal of our letter to you dated August 30, 1993 being received on August 30, 1993 at 16:07, Pat Manning has requested a re-transmittal. Attached is a copy of the letter sent to you on August 30, 1993, together with a copy of the fax confirmation.

NUMBER OF PAGES TRANSMITTED INCLUDING THIS SHEET: 3

If all pages are not legibly received, please call:

KATE ALLWURDEN at (813) 866-5185  
Telecopier Operator

The information contained in this transmittal is attorney privileged and confidential information intended only for the use of the individual or entity named above. If this transmittal is received by anyone other than the intended recipient, you are hereby notified that any dissemination, distribution or copy of these contents is strictly prohibited. If you have received this transmittal in error, please immediately notify the sender by telephone (if long distance, please call collect) and return the original transmittal to the sender at the above address by U.S. Mail. Thank you.



August 30, 1993

Mr. John C. Brown, P.E.  
Administrator  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Extension Request of Construction Permit AC 64-191015  
DeBary New Combustion Turbines Peaking Facility

Dear Mr. Brown:

As you are aware, the most recent extension of the construction permit for the above-referenced facility expires on August 30, 1993. FPC has previously submitted a Certificate of Completion of Construction, the final compliance test report for the facility and any other information requested by DEP in support of FPC's application for an operating permit. Additionally, FPC has been informed orally by the Department that the operating permit for the facility will be issued shortly, but has been delayed briefly for proofreading and finalization of the text. It is apparent that the operating permit will not be issued before the expiration of the current construction permit extension.

FPC believes that it has, in accordance with FAC 17-4.080 (3), demonstrated "reasonable assurances" that an extension of the construction permit will comply with the standards and conditions required by applicable regulation. Accordingly, FPC requests such further extension of the construction permit as may be needed to afford DEP sufficient time to conclude processing of the operating permit for this facility.

We appreciate DEP's cooperation in this regard. If you have any questions, please contact Mr. Kent Hedrick at (813) 866-4281.

Sincerely

*Patricia Blizard, Director, for*

W. Jeffrey Pardue, C.E.P.  
Manager, Environmental Programs

WJP/kma

cc: A. Alexander

## Transmit Confirmation Report

No. : 005  
Receiver : 7-79049226979  
Transmitter : FLA POWER LEGAL DEPT  
Date : Aug 30 '93 16:07  
Time : 01:20  
Mode : Norm  
Pages : 02  
Result : OK