Orlando CoGen Limited, L.P.
Orlando CoGen Facility

Facility ID No. 0950203
Orange County

Title V Air Operation Permit Renewal

Permit No. 0950203-011-AV
(Renewal of Title V Air Operation Permit No. 0950203-009-AV)

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Permitting Authority:

State of Florida
Department of Environmental Protection
Office of Permitting and Compliance

2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: (850) 717-9000
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Compliance Authority:

State of Florida
Department of Environmental Protection
Orange County Environmental Protection Department

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Title V Air Operation Permit Renewal

Permit No. 0950203-011-AV

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PERMITTEE:
Orlando CoGen Limited, L.P.
8275 Exchange Drive
Orlando, Florida 32809-7651

Permit No. 0950203-011-AV
Orlando CoGen
Facility ID No. 0950203
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit for the above referenced facility. The existing Orlando CoGen facility is located at 8275 Exchange Drive, Orlando, Orange County. UTM Coordinates are: Zone 17, 459.5 East (km), 3,146.1 North (km). Latitude is: 28° 26′ 23"; and, Longitude is: 81° 24′ 28".

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: January 1, 2014
Renewal Application Due Date: May 20, 2018
Expiration Date: December 31, 2018

(Draft)

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Electronic Signature

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Subsection A. Facility Description.

This facility consists of one 86.8 MW combustion turbine (CT) and one heat recovery steam generator (HRSG) equipped with one duct burner system. The HSRG powers a nominal 50 MW steam turbine (ST). Ancillary equipment includes one four-cell mechanical draft fresh water cooling tower, a chiller unit and a natural gas fired 150kW emergency generator. The facility's nominal output for the combined cycle unit including the CT and ST is 136.8 megawatts (MW). This facility utilizes natural gas as its only fuel. The facility operates one 150 kW Olympian natural gas fired emergency generator.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Combustion Turbine (CT)
002	Heat Recovery Steam Generator (HRSG) and Duct Burner (DB) System
003	Emergency Generator

Subsection C. Applicable Regulations.

Based on the Title V Air Operation Renewal application received May 15, 2013, this facility is not a major source of hazardous air pollutants (HAPs). This facility is classified as a PSD major facility. A summary of applicable regulations is shown in the following table.

Regulation	**EU No(s).**
40 CFR 60, Subpart A, NSPS General Provisions	001, 002
40 CFR 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines	001, 002
40 CFR 75 Acid Rain Monitoring Provisions	001, 002
40 CFR 63, Subpart A, NESHAP General Provisions	003
40 CFR 63, Subpart ZZZZ, Standards for Stationary Reciprocating Internal Combustion Engines	003

State Rule Citations	**EU No(s).**
Rule 62-4, Florida Administrative Code (F.A.C.), Permitting Requirements	001, 002, 003
Rule 62-204, F.A.C., Air Pollution Control-General Provisions	001, 002
Rule 62-210, F.A.C., Stationary Sources-General Requirements	001, 002
Rule 62-212, F.A.C., Stationary Sources-Preconstruction Review	001, 002
Rule 62-213, F.A.C., Operation Permits for Major Sources of Air Pollution	001, 002
Rule 62-214, F.A.C., Requirements for Sources Subject to the Federal Acid Rain Program	001, 002
Rule 62-296, F.A.C., Stationary Sources Emissions Standards	001, 002
Rule 62-297, F.A.C., Stationary Sources Emissions Monitoring	001, 002

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The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section V, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed unnecessary and ordered by the Department. Nothing is deemed necessary and ordered at this time. [Rule 62-296.320(1)(a), F.A.C.]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Maintenance of roads, parking areas, and yards;
b. Landscaping or planting of vegetation;
c. Confining abrasive blasting where possible; and,
d. Other techniques, as necessary

[Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in Title V air operation permit renewal application received July 7, 2008]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by April 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/Air/permitting/tvfee.htm. [Rule 62-213.205, F.A.C. and §403.0872(11), Florida Statutes (2013)]

{Permitting Note: In addition to the change in the Title V fee submission from March 1st to April 1st, Chapter 403.0872(11)(a) has been revised to require that the annual fee be calculated based upon actual emissions rather than allowable emissions, as in the past. The Department will be exploring the development of a revision to the electronic annual operating report (EAOR) application to automatically calculate the amount

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of the fee based upon actual emission information provided with the annual operating report. When completed, the procedures for submitting the fee and/or the submission address may change. Until further notice, the fees shall continue to be submitted to the address shown in Specific Condition FW7 and according to instructions posted on the Department's fee information web page. Be sure to check the Title V Annual Emissions Fee On-line Information Center (see above web site address) periodically for updates, especially before submitting future Title V fee payments.}

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 1515, Lanham-Seabrook, MD 20703-1515, Telephone: 301/429-5018.

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

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Subsection A. Emissions Unit 001

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	Combustion Turbine (CT)

The combined cycle CT is an upgraded Alstom Model GT 11NMC (Permit No. 0950203-007-AC) with a nameplate rating of 86.8 MW at ISO conditions. The CT is allowed to burn only natural gas. The CT is equipped with dry low nitrogen oxides (NO_X) (DLN) combustors to control NO_X emissions. A continuous emissions monitoring system (CEMS) is utilized for NO_X. The CT began commercial operation on September 25, 1993. Stack height = 115 feet, exit diameter = 15.7 feet, exit temperature = 240 ºF, actual volumetric flow rate = 668,145 acfm.

{Permitting notes: The emissions unit is regulated under Acid Rain, Phase II; CAIR, NSPS - 40 CFR 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines, adopted and incorporated by reference in Rule 62-204.800(8), F.A.C.; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated August 17, 1992.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable heat input rate is as follows:

Unit No.	Heat Input [based on the low heating value (LHV) of fuel at ISO conditions]	Fuel Type
EU001	980 MMBtu/hr	Natural Gas

[Rules 62-4.160(2), F.A.C., 62-204.800, F.A.C., 62-296.405, F.A.C., 62-210.200(Definitions - PTE), F.A.C., 62-214.330, F.A.C.; and, Permit No. 0950203-007-AC]

A.2. Hours of Operation. These emissions units may operate continuously (8760 hours/year). [Rule 62-210.200(Definitions - PTE), F.A.C., Permit No. AC48-206720 (PSD-FL-184)]

Control Technology

A.3. Control Equipment. DLN combustors shall be installed and maintained on the combustion turbine to control NO_X emissions. [AC48-20670 (PSD-FL-184), BACT determination dated August 17, 1992]

Emission Limitations and Standards

Unless otherwise specified, the averaging time(s) for Specific Condition(s) **A.4. - A.9**. is based on the specified averaging time of the applicable test method.

A.4. Nitrogen Oxides (NO_X). NO_X emissions shall not exceed 15 ppmvd (24-hr rolling average) @ 15% O_2 [63.1 lbs/hr (24 hr rolling average); 251.4 TPY]. (See also Subsection C. Common Conditions, Specific Condition **C.5.)** [Permit Nos. 0950203-007-AC and AC48-206720 (PSD-FL-184); BACT Determination, dated August 17, 1992; and, 40 CFR 60.4320]

[Permitting Note: Continuous compliance with the NO_X emission limits is being demonstrated through the use of the continuous emissions monitor that is required in Specific Condition **C.13**.]

A.5. Carbon Monoxide (CO). CO emissions shall not exceed 10 ppmvd at 15% O_2 (23.3 lbs/hr; 92.1 TPY). [AC48-206720 (PSD-FL-184); and, BACT Determination, dated August 17, 1992]

A.6. Particulate Matter (PM/PM_{10}). PM/PM_{10} emissions shall not exceed 0.01 lb/MMBtu (9.9 lbs/hr; 43.3 TPY). [BACT Determination, dated August 17, 1992; Permit No. 0950203-007-AC]

A.7. Volatile Organic Compounds (VOC). VOC emissions shall not exceed 3.3 lbs/hr; 14.3 TPY. [BACT Determination, dated August 17, 1992; Permit No. 0950203-007-AC]

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A.8. Visible Emissions (VE). VE from the CT shall not exceed 10% opacity. [Permit No. AC48-206720 (PSD-FL-184)]

A.9. Sulfur Dioxide (SO_2). See Subsection C. Common Conditions, Specific Condition **C.6.**

Excess Emissions

See Subsection C. Common Conditions.

Continuous Monitoring Requirements

See Subsection C. Common Conditions.

Test Methods and Procedures

See Subsection C. Common Conditions for additional test methods and procedures requirements.

A.10. Operating Capacity During Testing. Testing of emissions shall be conducted with the source operating at capacity, as defined below. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 110 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report. Permitted capacity is defined as 90-100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. [Rules 62-297.31092), F.A.C. and 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

See Subsection C. Common Conditions.

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The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Heat Recovery Steam Generator (HRSG) and Duct Burner (DB) System

The HRSG accepts exhaust from the CT. The HSRG powers a nominal 50 MW steam turbine (ST). The transition duct from the CT to the HRSG contains DBs manufactured by COEN Company Incorporated. The DB system is allowed to burn only natural gas. The emissions from the DB system are uncontrolled. The HRSG-DB System began commercial operation on September 25, 1993. The DB system shares a common stack with the CT. Stack height = 115 feet, exit diameter = 15.7 feet, exit temperature = 240 ºF, actual volumetric flow rate = 731.91 acfm.

{Permitting notes: The emissions unit is regulated under Acid Rain, Phase II; CAIR; NSPS - 40 CFR 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines, adopted and incorporated by reference in Rule 62-204.800(8), F.A.C.; Rule 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated August 17, 1992.}

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum allowable heat input rate is as follows:

Unit No.	Heat Input [based on the low heating value (LHV) of fuel]		Fuel Type
002	122.0 MMBtu/hr	450,000 MMBtu/yr	Natural Gas

[Rules 62-4.160(2), F.A.C., 62-204.800, F.A.C., 62-296.405, F.A.C., 62-210.200(Definitions - PTE), F.A.C., 62-214.330, F.A.C.; and, Permit No. AC48-206720 (PSD-FL-184)]

B.2. Hours of Operation. The hours of operation for the DB shall not exceed 3,688 hours/year at maximum heat input (Note: The DB, however, may operate at lower heat input rates for more hours, up to 8,760, within the annual heat input limit). The DB operation is planned when the ambient temperature is greater than 59 °F. [Rule 62-210.200(Definitions - PTE), F.A.C., Permit No. AC48-206720 (PSD-FL-184)]

Emission Limitations and Standards

B.3. Nitrogen Oxides (NO_X). NO_X emissions shall not exceed 0.1 lb/MMBtu, 24-hour rolling average (12.2 lb/hr; 22.5 TPY). (See also Subsection C. Common Conditions, Specific Condition **C.5.)** [Permit No. AC48-206720 (PSD-FL-184); BACT Determination dated August 17, 1992.]

{Permitting Note: Continuous compliance with the NO_X emission limits is being demonstrated through the use of the continuous emissions monitor that is required in Specific Condition **C.13**.}

B.4. Carbon Monoxide (CO). CO emissions shall not exceed 0.1 lb/MMBtu (12.2 lb/hr; 22.5 TPY). [Permit No. AC48-206720 (PSD-FL-184); BACT Determination dated August 17, 1992.]

B.5. Particulate Matter (PM/PM_{10}). PM/PM_{10} emissions shall not exceed 0.01 lb/MMBtu (1.2 lb/hr; 2.2 TPY). [Permit No. AC48-206720 (PSD-FL-184); BACT Determination dated August 17, 1992.]

B.6. Volatile Organic Compounds (VOCs). VOC emissions shall not exceed 3.7 lb/hr; 6.8 TPY. [Permit No. AC48-206720 (PSD-FL-184).]

B.7. Visible Emissions (VE). VE from the DB shall not exceed 10% opacity. [Permit No. AC48-206720 (PSD-FL-184).]

B.8. Sulfur Dioxide (SO_2). See Subsection C. Common Conditions, Specific Condition **C.6.**

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Excess Emissions

See Subsection C. Common Conditions.

Test Methods and Procedures

See Subsection C. Common Conditions.

Recordkeeping and Reporting Requirements

See Subsection C. Common Conditions.

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The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	Combustion Turbine (CT)
002	Heat Recovery Steam Generator (HRSG) and Duct Burner (DB) System

The following specific conditions apply to the emissions units listed above:

General

C.1. Definitions. For the purposes of Rule 62-204.800(8), F.A.C., the definitions contained in the various provisions of 40 CFR 60 shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee. [40 CFR 60.2; Rule 62-204.800(7)(a), F.A.C.]

C.2. Operating Procedures. Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]

Essential Potential to Emit (PTE) Parameters

C.3. Emissions Unit Operating Rate Limitation after Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

C.4. Methods of Operation. Natural gas shall only be burned in these units. The burning of other fuels shall require review, public notice, and approval by the Department through the pre-construction process. [Rules 62-213.410, F.A.C. and 62-210.200, F.A.C.; Applicant's request in Title V permit renewal application received July 7, 2008; and, Permit No. AC48-206720 (PSD-FL-184)]

Emission Limitations and Standards

C.5. Nitrogen Oxides (NO_X). When both the CT and DB are operating, NO_X emissions shall not exceed 15 ppmvd @ 15% O_2 .[Permit No. 0950203-007-AC; and, BACT Determination dated August 17, 1992; 40 CFR 60.4320]

{Permitting Note: Continuous compliance with the NO_X emission limits is being demonstrated through the use of the continuous emissions monitor that is required in Specific Condition **C.13**.}

C.6. Sulfur Dioxide (SO_2). Sulfur dioxide emissions shall not exceed 0.90 pounds per megawatt-hour (lb/MWh) [(110 nanograms per Joule (ng/J)] gross output or 0.060 pounds SO_2 per MMBtu (26 ng SO_2/J) heat input. [Permit No. 0950203-007-AC, 40 CFR 60.4330]

Emissions Controls

C.7. Combustion Control. Combustion control shall be utilized for CO control. The permittee shall have designed the facility to allow for future installation of an oxidation catalyst. [Permit No. AC48-206720 (PSD-FL-184)]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP, CAIR, or Acid Rain program provision.

C.8. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for a longer duration. [Rule 62-210.700(1), F.A.C.]

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C.9. Preventable Excess Emissions. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

C.10. NO_X Excess Emissions. Excess emissions and monitor downtime that must be reported shall be defined as described in 40 CFR 60.4380. For purposes of identifying excess emissions from CEMS, CEMS data shall meet the criteria according to 40 CFR 60.4350. [40 CFR 4380, 40 CFR 4350, Permit No. 0950203-007-AC]

C.11. SO_2 Excess Emissions. Excess emissions and monitor downtime that must be reported shall be defined as described in 40 CFR 60.4380. [Permit No. 0950203-007-AC, 40 CFR 60.4385]

C.12. CEMS Data Exclusion – DLN Tuning. CEMS data collected during initial or other major DLN tuning sessions shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer's specifications. A "major tuning session" would occur after completion of initial construction, a combustor change-out, a major repair or major maintenance to a combustor. Prior to performing any major tuning session, the permittee shall provide the Department's Central District Compliance Authority with an advance notice that details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal or electronic mail.
[Rule 62-4.070(3), F.A.C., Applicant's Request dated July 7, 2008]

Continuous Monitoring Requirements

C.13. Continuous Emissions Monitor (CEM). The permittee shall calibrate, maintain and operate a CEM in the stack to measure and record the NO_X emissions from this source. The CEM must comply with 40 CFR 60, Appendix B, Performance Specification 2. The CEM shall meet the requirements in 40 CFR 60.4345.
[Permit No. 0950203-007, 40 CFR 60 Subpart KKKK]

C.14. CEM Compliance Demonstration. The permittee shall calibrate, maintain and operate a continuous emission monitor (CEM) in the stack to measure and record the nitrogen oxide (NO_X) emissions from this source. The continuous emission monitor must comply with 40 CFR 60, Appendix B, Performance Specification 2. For the purpose of demonstrating ongoing compliance with the applicable NO_X emission limitations in **A.4., B.3., and C.5.,** using the stack CEM, compliance is considered to occur when the NO_X emissions are less than or equal to 63.1 lb/hr when only the CT is operating and less than or equal to 75.3 lb/hr when both the CT and DB are operating. The 24-hour rolling average compliance level is calculated based on the proportion of hours in any 24-hour period that the CT only or the CT/DB are operating. Any portion of an hour that the DB operates is recognized as an hour period on the rolling average.

For example, in a given contiguous 24-hour period, with 20 hours of CT operation only and 4 hours of CT/DB operation:

Calculated Emission Limitation = [(63.1 lb/hr x 20 hrs) + (75.3 lb/hr x 4 hrs)]/24 hrs
24 hour rolling average-compliance NO_X level = 65.1 lb/hr

Compliance with the permitted NO_X emission limitation is considered satisfied as long as the NO_X emissions from the stack CEM are less than or equal to the calculated NO_X emissions, averaged over the same 24-hour period. [Permit Nos. AC 48-206720/PSD-FL-184 and 0950203-007-AC]

Test Methods and Procedures

C.15. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1	Sample and Velocity Traverses for Stationary Sources
3A	Determination of Oxygen and Carbon Dioxide Concentrations in Emission from Stationary Sources (Instrumental Analyzer Procedure)

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Method	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
6	Determination of Sulfur Dioxide Emissions From Stationary Sources
6C	Determination of Sulfur Dioxide Emissions from Station Sources (Instrumental Analyzer Procedure)
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
8	Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate, Sulfur Dioxide and Nitrogen Oxides Emission Rates
20	Determination of Nitrogen Oxides, Sulfur Dioxide, Diluent Emissions from Stationary Gas Turbines
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)
ASTM D5287	Standard Practice for Automatic Sampling of Gaseous Fuels
ASTM D1072	Standard Test Method for Total Sulfur in Fuel Gases by Combustion and Barium Chloride Titration

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Permit Nos. AC48-206720 (PSD-FL-184) and 0950203-007-AC, Rules 62-297.310, F.A.C, 62-204.401, F.A.C., 40 CFR 60 Subpart A, 40 CFR 60 Subpart KKKK]

C.16. Annual Compliance Tests.

a. *Pollutants*. During each federal fiscal year (October 1st to September 30th), the emission units shall be tested to demonstrate compliance with the emissions standards for CO and VE. Annual tests may be required for volatile organic carbons (VOC) and particulate matter (PM).

b. *Units.* Tests shall be conducted for the CT only, and the CT plus the DB. However, testing is not required for DB unless it operates more than 400 hours per year. Annual compliance tests for the pollutants specified in Specific Condition **C.15.a** above shall be performed on each unit for each fuel fired for 400 hours or more during the federal fiscal year.

c. *Methods.* Required annual tests shall be conducted concurrently, and shall be conducted using the EPA reference methods in accordance with 40 CFR 60 Subpart KKKK, 40 CFR 60 Subpart A, and this permit.

d. *Opacity.* Unless specifically requested by the Compliance Authority pursuant to Rule 62-297.310(7)(b), F.A.C., periodic opacity tests are not required when firing natural gas.

[Rule 62-297.310(7), F.A.C. and Permit Nos. AC48-206720 (PSD-FL-184), 0950203-007-AC]

C.17. Visible Emissions (VE) Compliance. The test method for VE shall be EPA Method 9. There shall be two one-hour VE tests while firing gas at maximum load, one hour with the DB on and one hour with the DB off. [Permit No. AC48-206720]

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C.18. Nitrogen Oxides (NO_X) Compliance. Compliance with NO_X emission limits shall be demonstrated by CEMS and in accordance with the requirements of 40 CFR Subpart 60.4400. [40 CFR 60.4400, Permit No. 0950203-007-AC]

C.19. Carbon Monoxide (CO) Compliance. The test method for CO shall be EPA Method 10. [Permit No. AC48-206720]

C.20. Particulate Matter (PM/PM_{10}) Compliance. When required, the test method for PM/PM_{10} shall be EPA Method 5. An opacity test at maximum load for the CT may be substituted for the annual PM/PM_{10} emissions test. If, however, opacity values exceed 10%, then an EPA Method 5 PM/PM_{10} emissions test must be conducted on the CT at maximum load to demonstrate compliance with the PM/PM_{10} emissions standard. [Permit No. AC48-206720]

C.21. Volatile Organic Compounds (VOCs) Compliance. Specific VOC compliance testing is not required. Compliance with the total VOC emission limits will be assumed, provided the CO allowable emission rate is achieved. When required, the test method for VOCs shall be EPA Method 25A. [Permit No. AC48-206720]

C.22. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

C.23. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Notice of Excess Emissions and Monitor Downtime	Reporting frequency of document	40 CFR 60.4375
Annual Performance Test Results	Close of business of 60th day following completion of test	40 CFR 60.4375
Reports required by 40 CFR 60.7(c)	Postmarked by 30th day following each 60 month period	40 CFR 60.4395

C.24. Testing Notifications. The owner or operator shall notify the Orange County Environmental Protection Department, in writing, at least 15 days prior to the date on which each formal compliance test is to begin, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]

C.25. Notification of Malfunction Excess Emissions. In case of excess emissions resulting from malfunctions, Orlando CoGen Limited shall notify the Orange County Environmental Protection Department in accordance with 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

DRAFT

This section of the permit addresses the following emissions unit.

EU No.	Brief Description
003	150 kW Natural Gas Emergency Generator

The Olympian 150 kW natural gas emergency generator model number G150G1 has a heat input of 1.99 mmBtu/hr at 100% load.

Engine	Qty.	Engine Displacement	Engine Model Year	Rating	Rule Applicability
Emergency Generator	1	494 cu. in. (8.1 liter)	2007 or later	150 kW	NESHAP Subpart A and ZZZZ

{Permitting Note: This emergency engine is regulated under 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) adopted in Rule 62.204.800(11)(b), F.A.C. This permit section addresses an "existing" emergency stationary engine less than or equal to 500 HP with a displacement of less than 10 liters per cylinder that is located at area sources of HAPs.}

Essential Potential to Emit (PTE) Parameters

D.1. Authorized Fuel. This Stationary Spark Ignition Internal Combustion Engines (SI-ICE) is fueled by natural gas. [Application No. 0950203-011-AV]

Hours of Operation

D.2. Emergency Situations. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 60.4211(e)]

D.3. Maintenance and Testing. Each RICE is authorized to operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.

a. Change oil and filter every 500 hours of operation or annually, whichever comes first
b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
c. Inspect all hoses and belts every 500 hours of operation or annually.

{Permitting Note: If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of 40 CFR 63 Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable}

[40 CFR 63.6603 and 63.6640]

D.4. Other Situations. Each RICE cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 60.4219]

DRAFT

Orlando CoGen
Operated by: Orlando CoGen Limited, L.P.
ORIS Code: 54466

The emissions units listed below are regulated under Phase II of the Federal Acid Rain Program.

E.U. ID No.	Brief Description
001	Combustion Turbine (CT)
002	Heat Recovery Steam Generator (HRSG) and Duct Burner (DB) System

A.1. The Phase II Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 05/14/13, received 05/15/13.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO_2) allowance allocations and nitrogen oxide (NO_X) requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2009	2010	2011	2012	2013
001	1	SO_2 allowances, under Table 2 or 3 of 40 CFR 73	0*	0*	0*	0*	0*
002	1	SO_2 allowances, under Table 2 or 3 of 40 CFR 73	0*	0*	0*	0*	0*

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.

b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

c. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

A.4. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62-214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts. [Rule 62-213.413, F.A.C.]

A.5. Comments, notes, and justifications: None.

DRAFT

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: ☐ New ☐ Revised ☒ Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

Plant name	State	ORIS/Plant Code
Orlando CoGen	FL	54466

STEP 2
Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO_2 Opt-in unit, enter "yes" in column "b".

For new units or SO_2 Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO_2 Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO_2 Opt-in Units Commence Operation Date	New or SO_2 Opt-in Units Monitor Certification Deadline
EU001	No	Yes		
EU002	No	Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		

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Plant Name (from STEP 1)	Orlando CoGen

STEP 3

Read the standard requirements.

Acid Rain Part Requirements.

(1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
(ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part;
(2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP; and
(ii) Have an Acid Rain Part.

Monitoring Requirements.

(1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
(3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
(4) For applications including a SO_2 Opt-in unit, a monitoring plan for each SO_2 Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO_2 Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

(1) The owners and operators of each source and each Acid Rain unit at the source shall:
(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
(i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
(ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

(1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
(2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
(i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
(ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

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STEP 3, Continued.

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
(7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a unit can hold, *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

STEP 4
For SO_2 Opt-in units only.

In column "f" enter the unit ID# for every SO_2 Opt-in unit identified in column "a" of STEP 2.

For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration.

In column "h" enter the hours.

f	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six months preceding initial application

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Plant Name (from STEP 1)	Orlando CoGen

STEP 3, Continued

Excess Emissions Requirements.

If a CAIR NO_X Ozone Season source emits NO_X during any control period in excess of the CAIR NO_X Ozone Season emissions limitation, then:
(1) The owners and operators of the source and each CAIR NO_X Ozone Season unit at the source shall surrender the CAIR NO_X Ozone Season allowances required for deduction under 40 CFR 96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAAA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_X Ozone Season source and each CAIR NO_X Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
(i) The certificate of representation under 40 CFR 96.313 for the CAIR designated representative for the source and each CAIR NO_X Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_X Ozone Season Trading Program.
(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_X Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO_X Ozone Season Trading Program.
(2) The CAIR designated representative of a CAIR NO_X Ozone Season source and each CAIR NO_X Ozone Season unit at the source shall submit the reports required under the CAIR NO_X Ozone Season Trading Program, including those under 40 CFR Part 96, Subpart HHHH.

Liability.

(1) Each CAIR NO_X Ozone Season source and each CAIR NO_X Ozone Season unit shall meet the requirements of the CAIR NO_X Ozone Season Trading Program.
(2) Any provision of the CAIR NO_X Ozone Season Trading Program that applies to a CAIR NO_X Ozone Season source or the CAIR designated representative of a CAIR NO_X Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO_X Ozone Season units at the source.
(3) Any provision of the CAIR NO_X Ozone Season Trading Program that applies to a CAIR NO_X Ozone Season unit or the CAIR designated representative of a CAIR NO_X Ozone Season unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_X Ozone Season Trading Program, a CAIR Part, or an exemption under 40 CFR 96.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_X Ozone Season source or CAIR NO_X Ozone Season unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

STEP 4

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the CAIR source or CAIR units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name David Good	Title Operations Manager
Company Owner Name Orlando CoGen Limited, L.P.	
Phone (407) 851-1350	E-mail Address david.good@northernstargen.com
Signature	Date 5/14/13

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Clean Air Interstate Rule (CAIR).

Operated by: Orlando Cogeneration Limited, L.P.
Plant: Orlando CoGen Facility
ORIS Code: 0950203

The emissions units below are regulated under the Clean Air Interstate Rule.

EU No.	Brief Description
001	Combustion Turbine (CT)
002	Heat Recovery Steam Generator (HRSG) and Duct Burner (DB) System

1. Clean Air Interstate Rule Application. The Clean Air Interstate Rule Part Form submitted for this facility is a part of this permit. The owners and operators of these CAIR units as identified in this form must comply with the standard requirements and special provisions set forth in the CAIR Part Form (DEP Form No. 62-210.900(1)(b)) received on May 15, 2013. [Chapter 62-213, F.A.C. and Rule 62-210.200, F.A.C.]

DRAFT

Clean Air Interstate Rule (CAIR) Part

For more information, see instructions and refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321 and 96.322; and Rule 62-296.470, F.A.C.

This submission is: ☐ New ☐ Revised ■ Renewal

STEP 1

Identify the source by plant name and ORIS or EIA plant code

Plant Name:	State:	ORIS or EIA Plant Code:
Orlando CoGen	Florida	54466

STEP 2

In column "a" enter the unit ID# for every CAIR unit at the CAIR source.

In columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s).

For new units, enter the requested information in columns "e" and "f.

a	b	c	d	e	f
Unit ID#	Unit will hold nitrogen oxides (NO_X) allowances in accordance with 40 CFR 96.106(c)(1)	Unit will hold sulfur dioxide (SO_2) allowances in accordance with 40 CFR 96.206(c)(1)	Unit will hold NO_X Ozone Season allowances in accordance with 40 CFR 96.306(c)(1)	New Units Expected Commence Commercial Operation Date	New Units Expected Monitor Certification Deadline
EU001	X	X	X	N/A	N/A

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Plant Name (from STEP 1) Orlando CoGen

STEP 3

Read the standard requirements.

CAIR NO_X ANNUAL TRADING PROGRAM

CAIR Part Requirements.

(1) The CAIR designated representative of each CAIR NO_X source and each CAIR NO_X unit at the source shall:
(i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.122 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
(ii) [Reserved];
(2) The owners and operators of each CAIR NO_X source and each CAIR NO_X unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CC, and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_X source and each CAIR NO_X unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HH, and Rule 62-296.470, F.A.C.
(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HH, shall be used to determine compliance by each CAIR NO_X source with the following CAIR NO_X Emissions Requirements.

NO_X Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_X source and each CAIR NO_X unit at the source shall hold, in the source's compliance account, CAIR NO_X allowances available for compliance deductions for the control period under 40 CFR 96.154(a) in an amount not less than the tons of total NO_X emissions for the control period from all CAIR NO_X units at the source, as determined in accordance with 40 CFR Part 96, Subpart HH.
(2) A CAIR NO_X unit shall be subject to the requirements under paragraph (1) of the NO_X Requirements starting on the later of January 1, 2009, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.170(b)(1) or (2) and for each control period thereafter.
(3) A CAIR NO_X allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_X Requirements, for a control period in a calendar year before the year for which the CAIR NO_X allowance was allocated.
(4) CAIR NO_X allowances shall be held in, deducted from, or transferred into or among CAIR NO_X Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FF and GG.
(5) A CAIR NO_X allowance is a limited authorization to emit one ton of NO_X in accordance with the CAIR NO_X Annual Trading Program. No provision of the CAIR NO_X Annual Trading Program, the CAIR Part, or an exemption under 40 CFR 96.105 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
(6) A CAIR NO_X allowance does not constitute a property right.
(7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EE, FF, or GG, every allocation, transfer, or deduction of a CAIR NO_X allowance to or from a CAIR NO_X unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_X unit.

Excess Emissions Requirements.

If a CAIR NO_X source emits NO_X during any control period in excess of the CAIR NO_X emissions limitation, then:
(1) The owners and operators of the source and each CAIR NO_X unit at the source shall surrender the CAIR NO_X allowances required for deduction under 40 CFR 96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_X source and each CAIR NO_X unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
(i) The certificate of representation under 40 CFR 96.113 for the CAIR designated representative for the source and each CAIR NO_X unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_X Annual Trading Program.
(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_X Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO_X Annual Trading Program.
(2) The CAIR designated representative of a CAIR NO_X source and each CAIR NO_X unit at the source shall submit the reports required under the CAIR NO_X Annual Trading Program, including those under 40 CFR Part 96, Subpart HH.

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Plant Name (from STEP 1) Orlando CoGen

STEP 3, Continued

Liability.

(1) Each CAIR NO_X source and each CAIR NO_X unit shall meet the requirements of the CAIR NO_X Annual Trading Program.
(2) Any provision of the CAIR NO_X Annual Trading Program that applies to a CAIR NO_X source or the CAIR designated representative of a CAIR
NO_X source shall also apply to the owners and operators of such source and of the CAIR NO_X units at the source.
(3) Any provision of the CAIR NO_X Annual Trading Program that applies to a CAIR NO_X unit or the CAIR designated representative of a CAIR NO_X unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_X Annual Trading Program, a CAIR Part, or an exemption under 40 CFR 96.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_X source or CAIR NO_X unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR SO_2 TRADING PROGRAM

CAIR Part Requirements.

(1) The CAIR designated representative of each CAIR SO_2 source and each CAIR SO_2 unit at the source shall:
(i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.222 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
(ii) [Reserved];
(2) The owners and operators of each CAIR SO_2 source and each CAIR SO_2 unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CCC, for the source and operate the source and each CAIR unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR SO_2 source and each SO_2 CAIR unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96 ,Subpart HHH, and Rule 62-296.470, F.A.C.
(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHH, shall be used to determine compliance by each CAIR SO_2 source with the following CAIR SO_2 Emission Requirements.

SO_2 Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO_2 source and each CAIR SO_2 unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO_2 allowances available for compliance deductions for the control period, as determined in accordance with 40 CFR 96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO_2 units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHH.
(2) A CAIR SO_2 unit shall be subject to the requirements under paragraph (1) of the Sulfur Dioxide Emission Requirements starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.270(b)(1) or (2) and for each control period thereafter.
(3) A CAIR SO_2 allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the SO_2 Emission Requirements, for a control period in a calendar year before the year for which the CAIR SO_2 allowance was allocated.
(4) CAIR SO_2 allowances shall be held in, deducted from, or transferred into or among CAIR SO_2 Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFF and GGG.
(5) A CAIR SO_2 allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO_2 Trading Program. No provision of the CAIR SO_2 Trading Program, the CAIR Part, or an exemption under 40 CFR 96.205 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
(6) A CAIR SO_2 allowance does not constitute a property right.
(7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart FFF or GGG, every allocation, transfer, or deduction of a CAIR SO_2 allowance to or from a CAIR SO_2 unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR SO_2 unit.

Excess Emissions Requirements.

If a CAIR SO_2 source emits SO_2 during any control period in excess of the CAIR SO_2 emissions limitation, then:
(1) The owners and operators of the source and each CAIR SO_2 unit at the source shall surrender the CAIR SO_2 allowances required for deduction under 40 CFR 96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAA, the Clean Air Act, and applicable state law.

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STEP 3, Continued

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR SO_2 source and each CAIR SO_2 unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Department or the Administrator.

(i) The certificate of representation under 40 CFR 96.213 for the CAIR designated representative for the source and each CAIR SO_2 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.213 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO_2 Trading Program.

(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR SO_2 Trading Program or to demonstrate compliance with the requirements of the CAIR SO_2 Trading Program.

(2) The CAIR designated representative of a CAIR SO_2 source and each CAIR SO_2 unit at the source shall submit the reports required under the CAIR SO_2 Trading Program, including those under 40 CFR Part 96, Subpart HHH.

Liability.

(1) Each CAIR SO_2 source and each CAIR SO_2 unit shall meet the requirements of the CAIR SO_2 Trading Program.

(2) Any provision of the CAIR SO_2 Trading Program that applies to a CAIR SO_2 source or the CAIR designated representative of a CAIR SO_2 source shall also apply to the owners and operators of such source and of the CAIR SO_2 units at the source.

(3) Any provision of the CAIR SO_2 Trading Program that applies to a CAIR SO_2 unit or the CAIR designated representative of a CAIR SO_2 unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR SO_2 Trading Program, a CAIR Part, or an exemption under 40 CFR 96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO_2 source or CAIR SO_2 unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR NO_x OZONE SEASON TRADING PROGRAM

CAIR Part Requirements.

(1) The CAIR designated representative of each CAIR NO_X Ozone Season source and each CAIR NO_X Ozone Season unit at the source shall:

(i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.322 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and

(ii) [Reserved];

(2) The owners and operators of each CAIR NO_X Ozone Season source required to have a Title V operating permit or air construction permit, and each CAIR NO_X Ozone Season unit required to have a Title V operating permit or air construction permit at the source shall have a CAIR Part included in the Title V operating permit or air construction permit issued by the DEP under 40 CFR Part 96, Subpart CCCC, for the source and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_X Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHHH, and Rule 62-296.470, F.A.C.

(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHHH, shall be used to determine compliance by each CAIR NO_X Ozone Season source with the following CAIR NO_X Ozone Season Emissions Requirements.

NO_x Ozone Season Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_X Ozone Season source and each CAIR NO_X Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_X Ozone Season allowances available for compliance deductions for the control period under 40 CFR 96.354(a) in an amount not less than the tons of total NO_X emissions for the control period from all CAIR NO_X Ozone Season units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHHH.

(2) A CAIR NO_X Ozone Season unit shall be subject to the requirements under paragraph (1) of the NO, Ozone Season Emission Requirements starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.370(b)(1),(2), or (3) and for each control period thereafter.

(3) A CAIR NO_X Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_X Ozone Season Emission Requirements, for a control period in a calendar year before the year for which the CAIR NO_X Ozone Season allowance was allocated.

(4) CAIR NO_X Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_X Ozone Season Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFFF and GGGG.

(5) A CAIR NO_X Ozone Season allowance is a limited authorization to emit one ton of NO_X in accordance with the CAIR NO_X Ozone Season Trading Program. No provision of the CAIR NO_X Ozone Season Trading Program, the CAIR Part, or an exemption under 40 CFR 96.305 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.

(6) A CAIR NO_X Ozone Season allowance does not constitute a property right.

(7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EEEE, FFFF or GGGG, every allocation, transfer, or deduction of a CAIR NO_X Ozone Season allowance to or from a CAIR NO_X Ozone Season unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_X Ozone Season unit.

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STEP 5

For SO_2 Opt-in units only. (Not required for SO_2 Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO_2 Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO_2 Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO_2 Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO_2 Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO_2 Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)

STEP 6

For SO_2 Opt-in units only.

Attach additional requirements, certify and sign.

A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
D. Attach a complete compliance plan for SO_2 under 40 CFR 72.40.
E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

Signature	Date

STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name David Good	Title Operations Manager
Owner Company Name Orlando CoGen Limited, L.P.	
Phone (407) 851-1350	E-mail address david.good@northernstargen.com
Signature	Date 5/14/13

DEP Form No. 62-210.900(1)(a) – Form
Effective: 3/16/08

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SECTION VI. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NSPS, Subpart A – General Provisions.
Appendix NSPS, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix NESHAP, Subpart A – General Provisions
Appendix ZZZZ, Subpart ZZZZ, Standards for Stationary Reciprocating Internal Combustion Engines

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