



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 31, 2011

Sent by Electronic Mail – Received Receipt Requested

James Murray, Plant Manager
Orlando CoGen Limited, LP.
8275 Exchange Drive
Orlando, Florida 32809

Re: Update Gas Mapping Curves – Alstom Combustion Turbine (CT) Model GT 11NMC
Project No. 0950203-010-AC
Combined Cycle CT Emission Unit (EU) 001 – Excess Emissions Authorization

Dear Mr. Murray:

The Department has reviewed your request that was received on March 23, 2011, to allow excess emissions for EU-001 during the updating of gas mapping curves by Alstom. EU-001 consists of an Alstom Model GT 11NMC combined cycle CT. The gas mapping will occur during the current 3 year maintenance cycle at the plant. The curve mapping will result in multiple stops and starts and extended periods of low load runs. This could result in NO_x emissions exceeding the two hour excess emission limit given in **Specific Condition III.C.8** of the plants Title V Operation Permit No. 0950203-009-AV. The projected start date of the 3 year maintenance cycle at the plant is April 12, 2011.

The Department authorizes excess NO_x emissions while updating of the gas mapping curves by Alstom of the combined cycle CT Model GT 11NMC provided:

- The operator adheres to best operational practices to minimize emissions;
- The operator minimizes the duration of excess emissions, which shall not exceed 6 hours for any 24 hour period over a 5 day period beginning with the start of CT testing;
- The operator notifies the Orange County Environmental Protection Division within one (1) hour of the start up of the CT for the mapping update; and,
- The owner or operator submits a report summarizing the hourly NO_x emissions during the CT testing.

Nothing in this action waves any federal requirements of the applicable New Source Performance Standards (NSPS) for this unit. The EU is subject to NSPS 40 CFR 60, Subpart KKKK—Standards of Performance for Stationary Combustion Turbines. The requirements of this subpart dealing with excess emissions of NO_x must still be met. In particular, § 60.4350 dealing with using data from the continuous emission monitoring equipment to identify excess emissions and

60.4380 dealing with how excess NO_x emissions and monitor downtime are defined shall be followed.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, of the Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure,

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with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/aal/dlr

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this authorization was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 3/31/11 to the persons listed below.

Ms. Jodi Dittell, OC EPC: Jodi.Dittell@ocfl.net

Mr. David Good, Orlando CoGen: david.good@northenstargen.com

Mr. David Kellermeyer, NSGS: david.kellermeyer@northernstargen.com

Ms. Caroline Shine, DEP Central District Office: caroline.shine@dep.state.fl.us

Ms. Vickie Gibson, DEP BAR Reading File: victoria.gibson@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

5/31/11

(Date)