

# HARDEE POWER PARTNERS

Invenergy

Via Federal Express

August 6, 2004

Mr. James K. Pennington, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

AUG 09 2004

BUREAU OF AIR REGULATION

Re: Comments on Draft Title V Air Operation Permit  
Hardee Power Partners (HPP)  
Hardee Power Station (HPS)  
DRAFT Permit Project No.: 0490015-005-AV

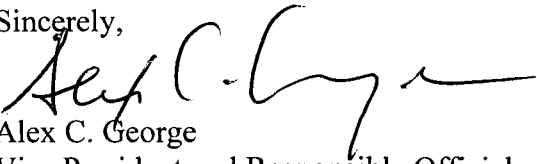
Dear Mr. Pennington:

HPP hereby provides comments to the above-referenced draft Title V Air Operation Permit. As required, these comments are being submitted within the 30-day public comment period.

Please feel free to contact me at (312) 224-1415, or Frank Sarduy at (863) 375-4711, if you have any questions regarding this information.

*I certify that, based on the information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.*

Sincerely,

  
Alex C. George  
Vice President and Responsible Official

Enclosure

Cc: Bruce Mitchell – FDEP – Tallahassee  
Jonathan Holtom – FDEP – Tallahassee  
Nancy Knight – FDEP – Southwest District Office – Tampa  
Frank Sarduy – Invenergy Services LLC

**Permit Effective, Renewal, and Expiration Dates – FDEP Cover Page and Appendix H-1: Permit History**

Comment:

*HPP requests these dates be updated based on the eventual issuance date of this permit.*

**B.17. Alternate Monitoring Plan**

Comment:

*It is HPP's understanding that the EPA has allowed the FDEP to generically approve Alternate Monitoring Plans that contain certain boiler plate language. HPP requests removal of the words "**Subject to EPA approval**" from the first sentence of condition B.17 if this language is obsolete.*

**B.17. Custom Fuel Monitoring Schedule for Natural Gas**

Comment:

*This section is currently numbered from 2 to 4. HPP requests renumbering from 1 to 3.*

**Appendix CAM Cover Page**

Comment:

*HPP requests that the Appendix CAM cover page list the plant owner, **Hardee Power Partners**, instead of **TECO Power Services**.*

**Appendix CAM, Table 1. Monitoring Approach, II. Indicator Range**

Comment:

*HPP has been able to obtain more accurate information regarding how and when alarms are generated by the Mark IV turbine control system at the Hardee Power Station. HPP requests the following language:*

“An excursion is defined as any *4 consecutive 1-minute averages* that the water-to-fuel ratio falls below the level *calculated by the Mark IV based on algorithms programmed into the system to account for varying ambient conditions relevant to proper control. These calculations incorporate the water injection curves* shown in Figures 1-6 (typical target values for different load percentages are shown in Table 2), below. If there is a problem with fuel or water flow that causes the actual ratio to fall below the target during any *4 consecutive 1-minute averages*, an alarm notifies the control room staff of the problem. Since the data is monitored in *4 consecutive 1-minute averages* and the compliance standard is based on 1-hour averages, the alarms allow the operating staff to investigate the cause and take corrective action prior to having a non-compliant situation.”