

**HARDEE POWER
PARTNERS LIMITED**

Invenergy

July 17, 2006

Mr. Jeff Koerner, P.E.
Professional Engineer Administrator
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 23
Tallahassee, Florida 32301

RECEIVED

JUL 19 2006

BUREAU OF AIR REGULATION

**Re: Hardee Power Partners
Hardee Power Station
FDEP FINAL Permit No.: 0490015-005-AV
Request for Permit Revision**

Dear Mr. Koerner:

The Department issued Title V Air Operation Permit Renewal FINAL Permit No.: 0490015-005-AV effective January 1, 2005 to Hardee Power Partners (HPP) authorizing continuing operation of the Hardee Power Station, located in Hardee County, Florida. This Title V permit contains monitoring requirements that are obsolete as a result of the July 4, 2004 revisions to New Source Performance Standard (NSPS) Subpart GG. Accordingly, HPP requests the following changes to the current Title V permit and previously issued Prevention of Significant Deterioration (PSD) Permit No. PSD-FL-140:

Permit Revision Request No. 1

Current Condition:

A.10. CMS Requirements. The Permittee shall install, operate, and maintain a continuous monitoring system (CMS) to monitor and record the fuel consumption, the ratio of water to fuel being fired in the turbine. The system shall be accurate to within ± 5.0 percent and shall be approved by the Department.
[40 CFR 60.334(a); and, PSD-FL-140]

Requested Condition:

A.10. CMS Requirements. The Permittee shall install, operate, and maintain a continuous monitoring system (CMS) to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine.
~~The system shall be accurate to within ± 5.0 percent and shall be approved by the Department.~~
[40 CFR 60.334(a); and, PSD-FL-140]

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The revisions to NSPS Subpart GG include removal of the requirement that the water-to-fuel ratio continuous monitoring system (CMS) be accurate to ± 5.0 percent.

Permit Revision Request No. 2

Current Condition:

A.11. Critical Fuel Parameters. The Permittee shall monitor sulfur content and nitrogen content of the fuel being fired in the CTs. Pursuant to the custom monitoring schedule provisions of 40 CFR 60.334(b)(2), the frequency of determination of these values shall be as follows:

1. Monitoring of the nitrogen content of No. 2 fuel oil is not required. The sulfur content of distillate fuel oil shall be determined for each shipment of No. 2 fuel oil received; and,
2. Monitoring of the nitrogen content of pipeline natural gas is not required. The sulfur content of pipeline natural gas will be based on twice-monthly analyses provided by the natural gas supplier.

[40 CFR 60.334(b)(1) & (2)]

Requested Condition:

A.11. Critical Fuel Parameters. The Permittee shall monitor sulfur content and nitrogen content of the fuel being fired in the CTs. Pursuant to the custom monitoring schedule provisions of 40 CFR 60.334(b)(2), the frequency of determination of these values shall be as follows:

1. Monitoring of the nitrogen content of No. 2 fuel oil is not required. The sulfur content of distillate fuel oil shall be determined for each shipment of No. 2 fuel oil received; and,
2. Monitoring of the nitrogen content of pipeline natural gas is not required. The sulfur content of pipeline natural gas will be monitored using the applicable monitoring procedures specified in 40 CFR Part 60.334(h) based on twice-monthly analyses provided by the natural gas supplier.

[40 CFR 60.334(h)(1) & (2)]

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The revisions to NSPS Subpart GG include several options for monitoring fuel sulfur content.

Permit Revision Request No. 3

Current Condition:

A.19. Sulfur Content. The Permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D 2880-96, or more recent version, shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92, or more recent versions, shall be used for the sulfur content of gaseous fuels (incorporated by reference - see 40 CFR 60.17).

The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Department.

[40 CFR 60.335(d); and, PSD-FL-140]

Requested Condition:

A.19. Sulfur Content. The Permittee shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) using the applicable test methods and procedures specified in 40 CFR 60.335 as follows: ~~ASTM D 2880-96, or more recent version, shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92, or more recent versions, shall be used for the sulfur content of gaseous fuels (incorporated by reference - see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Department.~~

[40 CFR 60.335(d); and, PSD-FL-140]

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The revisions to NSPS Subpart GG include several options for monitoring fuel sulfur content.

Permit Revision Request No. 4

Current Condition:

A.20. To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335(a) and 40 CFR 60.335(d) of 40 CFR 60.335 to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[40 CFR 60.335(e)]

Requested Condition:

~~**A.20.** To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335(a) and 40 CFR 60.335(d) of 40 CFR 60.335 to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.~~

~~[40 CFR 60.335(e)]~~

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The above Subpart GG citations are obsolete.

Permit Revision Request No. 5

Current Condition:

B.13. CMS Requirements. The permittee shall install, calibrate, operate and maintain a continuous monitoring system (CMS) to monitor and record the fuel consumption, the ratio of water to fuel being fired in the CT. The system shall be accurate to within ± 5.0 percent and shall be approved by the Department. As an alternative to the monitoring requirements of this condition, the permittee may comply with the monitoring requirements of specific condition **B.17** (See Alternate Monitoring Plan).

[40 CFR 60.334(a)]

Requested Condition:

B.13. CMS Requirements. The permittee shall install, calibrate, operate and maintain a continuous monitoring system (CMS) to monitor and record the fuel consumption, the ratio of water to fuel being fired in the CT. ~~The system shall be accurate to within ± 5.0 percent and shall be approved by the Department.~~ As an alternative to the monitoring requirements of this condition, the permittee may comply with the monitoring requirements of specific condition **B.17** (See Alternate Monitoring Plan).

[40 CFR 60.334(a)]

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The revisions to NSPS Subpart GG include removal of the requirement that the water-to-fuel ratio continuous monitoring system (CMS) be accurate to ± 5.0 percent.

Permit Revision Request No. 6

Current Condition:

B.15. Critical Fuel Parameters. The Permittee shall monitor sulfur content and nitrogen content of the fuel being fired in the CT. Pursuant to the custom monitoring schedule provisions of 40 CFR 60.334(b)(2), the frequency of determination of these values shall be as follows:

1. Monitoring of the nitrogen content of No. 2 fuel oil is not required. The sulfur content of distillate fuel oil shall be determined for each shipment of No. 2 fuel oil received; and,
2. Monitoring of the nitrogen content of pipeline natural gas is not required. The sulfur content of pipeline natural gas will be based on twice-monthly analyses provided by the natural gas supplier.

[40 CFR 60.334(b)(1) & (2)]

Requested Condition:

B.15. Critical Fuel Parameters. The Permittee shall monitor sulfur content and nitrogen content of the fuel being fired in the CT. Pursuant to the ~~monitoring custom monitoring schedule~~ provisions of 40 CFR 60.334(~~bb~~)(~~2~~), the frequency of determination of these values shall be as follows:

1. Monitoring of the nitrogen content of No. 2 fuel oil is not required. The sulfur content of distillate fuel oil shall be determined for each shipment of No. 2 fuel oil received; and,
2. Monitoring of the nitrogen content of pipeline natural gas is not required. The sulfur content of pipeline natural gas will be monitored using the applicable monitoring procedures specified in 40 CFR Part 60.334(h) based on twice monthly analyses provided by the natural gas supplier.

[40 CFR 60.334(~~h~~)(~~b~~)(1) & (2)]

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The revisions to NSPS Subpart GG include several options for monitoring fuel sulfur contents.

Permit Revision Request No. 7

Current Condition:

B.16. Fuel Records.

(a) Natural Gas. The permittee shall demonstrate compliance with the fuel sulfur limit for natural gas specified in this permit by maintaining records of the sulfur content of the natural gas being supplied for each month of operation. Methods for determining the sulfur content of the natural gas shall be ASTM methods D4084-82, D3246-81, or equivalent methods. These methods shall be used to determine the sulfur content of the natural gas fired in accordance with any EPA-approved custom fuel monitoring schedule (see Alternate Monitoring Plan: specific condition **B.17.**) or natural gas supplier data or the natural gas sulfur content referenced in 40 CFR 75, Appendix D. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency pursuant to 40 CFR 60.335(e). However, the permittee is responsible for ensuring that the procedures in 40 CFR 60.335 or 40 CFR 75 are used to determine the fuel sulfur content for compliance with the 40 CFR 60.333 SO₂ standard.

(b) Low Sulfur Distillate Oil. For all bulk shipments of low sulfur distillate oil received at this facility, the permittee shall obtain from the fuel vendor an analysis identifying the sulfur content. Methods for determining the sulfur content of the distillate oil shall be ASTM D129-91, D2622-94, or D4294-90, or equivalent methods. Records shall specify the test method used and shall comply with the requirements of 40 CFR 60.335(d).

[Rules 62-4.070(3) and 62-4.160(15), F.A.C.]

Requested Condition:

B.16. Fuel Records.

(a) Natural Gas. The permittee shall demonstrate compliance with the fuel sulfur limit for natural gas specified in this permit by maintaining records of the sulfur content of the natural gas being supplied using the applicable monitoring procedures specified in 40 CFR Part 60.334(h) for each month of operation. Methods for determining the sulfur content of the natural gas shall be made using the applicable test methods and procedures specified in 40 CFR 60.335 ~~ASTM methods D4084-82, D3246-81,~~ or equivalent methods. These methods shall be used to determine the sulfur content of the natural gas fired in accordance with any EPA-approved custom fuel monitoring schedule (see Alternate Monitoring Plan: specific condition **B.17.**) or

natural gas supplier data or the natural gas sulfur content referenced in 40 CFR 75, Appendix D. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency pursuant to 40 CFR 60.335~~(e)~~. However, the permittee is responsible for ensuring that the procedures in 40 CFR 60.335 or 40 CFR 75 are used to determine the fuel sulfur content for compliance with the 40 CFR 60.333 SO₂ standard.

(b) Low Sulfur Distillate Oil. For all bulk shipments of low sulfur distillate oil received at this facility, the permittee shall obtain from the fuel vendor an analysis identifying the sulfur content. Methods for determining the sulfur content of the distillate oil shall be made using the applicable test methods and procedures specified in 40 CFR 60.335 ASTM D129-91, D2622-91, or D4294-99, or equivalent methods. Records shall specify the test method used and shall comply with the requirements of 40 CFR 60.335~~(e)~~. [Rules 62-4.070(3) and 62-4.160(15), F.A.C.]

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The revisions to NSPS Subpart GG include several options for monitoring fuel sulfur contents.

Permit Revision Request No. 8

Current Condition:

B.17. Alternate Monitoring Plan

1. The following alternate monitoring may be used to demonstrate compliance.

a) The NO_x CEMS data may be used in lieu of the monitoring system for water-to-fuel ratio and the reporting of excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG. Subject to EPA approval, the calibration of the water-to-fuel ratio-monitoring device required in 40 CFR 60.335(c)(2) will be replaced by the 40 CFR 75 certification tests of the NO_x CEMS.

(b) The NO_x CEMS data shall be used in lieu of the requirement for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG.

(c) When requested by the Department, the CEMS emission rates for NO_x on this unit shall be corrected to ISO conditions to demonstrate compliance with the NO_x standard established in 40 CFR 60.332.(d) A **custom fuel monitoring schedule** pursuant to 40 CFR 75, Appendix D, for natural gas, may be used in lieu of the daily sampling requirements of 40 CFR 60.334(b)(2) provided the following conditions are met.

(1) The permittee shall apply for an Acid Rain Permit within the deadlines specified in 40 CFR 72.30.

(2) The permittee shall submit a monitoring plan, certified by signature of the Authorized Representative, that commits to using a primary fuel of pipeline supplied natural gas containing no more than 2 grains of sulfur per 100 SCF of gas pursuant to 40 CFR 75.11(d)(2).

(3) Each unit shall be monitored for SO₂ emissions using methods consistent with the requirements of 40 CFR 75 and certified by the USEPA.

This custom fuel-monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO₂ emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

[40 CFR 60, Subpart GG; and, PSD-FL-140A]

(e) The permittee shall monitor the sulfur contents of the No. 2 distillate fuel oil (or a superior grade) and natural gas. These values may be provided by the vendor and the frequency of determinations of these values shall be as follows:

a. No. 2 Distillate Fuel Oil (or a superior grade). The sulfur content shall be determined on each occasion that fuel is transferred to the storage tanks from any other source. Records of these values shall

be kept by the facility for a five year period for regulatory agency inspection purposes.

b. Natural Gas. Pursuant to 40 CFR 60.334(b)(2), a custom fuel monitoring schedule for the determination of these values shall be followed for the natural gas fired at this facility and shall be as follows:

Requested Condition:

B.17. Alternate Monitoring Plan.

1. The following alternate monitoring may be used to demonstrate compliance.

a) The NO_x CEMS data may be used in lieu of the monitoring system for water-to-fuel ratio and the reporting of excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG. Subject to EPA approval, the calibration of the water-to-fuel ratio monitoring device required in 40 CFR 60.335(c)(2) will be replaced by the 40 CFR 75 certification tests of the NO_x CEMS.

(b) The NO_x CEMS data shall be used in lieu of the requirement for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG.

(c) When requested by the Department, the CEMS emission rates for NO_x on this unit shall be corrected to ISO conditions to demonstrate compliance with the NO_x standard established in 40 CFR 60.332.(d) A **custom fuel monitoring schedule** pursuant to 40 CFR 75, Appendix D, for natural gas, may be used in lieu of the daily sampling requirements of 40 CFR 60.334(h)(2) provided the following conditions are met.

(1) The permittee shall apply for an Acid Rain Permit within the deadlines specified in 40 CFR 72.30.

(2) The permittee shall submit a monitoring plan, certified by signature of the Authorized Representative, that commits to using a primary fuel of pipeline supplied natural gas containing no more than 2 grains of sulfur per 100 SCF of gas pursuant to 40 CFR 75.11(d)(2).

(3) Each unit shall be monitored for SO₂ emissions using methods consistent with the requirements of 40 CFR 75 and certified by the USEPA.

This custom fuel-monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO₂ emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

[40 CFR 60, Subpart GG; and, PSD-FL-140A]

(e) The permittee shall monitor the sulfur contents of the No. 2 distillate fuel oil (or a superior grade) and natural gas. These values may be provided by the vendor and the frequency of determinations of these values shall be as follows:

a. No. 2 Distillate Fuel Oil (or a superior grade). The sulfur content shall be determined on each occasion that fuel is transferred to the storage tanks from any other source. Records of these values shall be kept by the facility for a five year period for regulatory agency inspection purposes.

b. Natural Gas. Monitoring shall be conducted in accordance with the applicable provisions of 40 CFR 60.334(h) and 60.335. Alternatively, pursuant to 40 CFR 60.334(h)(2), a custom fuel monitoring schedule for the determination of these values may be followed for the natural gas fired at this facility and shall be as follows:

Basis for Request:

NSPS Subpart GG was revised by EPA on July 8, 2004. The revisions to NSPS Subpart GG include several options for monitoring fuel sulfur contents.

In support of this Title V permit revision request, a completed Application for Air Permit - Long Form (Facility Information section only, including Responsible Official and Professional Engineer certifications) is enclosed.

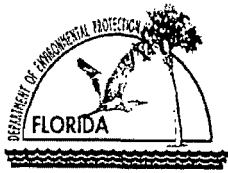
Please feel free to contact Frank Sarduy at (813) 314-2459 if you have any questions regarding this permit revision request.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex C. George". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alex C. George
Vice President

Enclosure



Department of Environmental Protection

RECEIVED

JUL 19 2006

Division of Air Resource Management BUREAU OF AIR REGULATION APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Hardee Power Partners	
2. Site Name: Hardee Power Station	
3. Facility Identification Number: 0490015	
4. Facility Location Street Address or Other Locator: 6695 County Road 663 North City: Fort Green Springs County: Hardee Zip Code: 33834	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Frank Sarduy, Environmental Manager	
2. Application Contact Mailing Address... Organization/Firm: Hardee Power Partners Limited Street Address: 10150 Highland Manor Drive, Suite 200 City: Tampa State: Florida Zip Code: 33610	
3. Application Contact Telephone Numbers... Telephone: (813) 314-2459 ext. Fax: (813) 433-5485	
4. Application Contact Email Address: fsarduy@invenergyservices.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	7-19-06
2. Project Number(s):	0490015-006-AC 0490015-007-AV
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

Air construction permit. (Revision Request)

Air Operation Permit

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

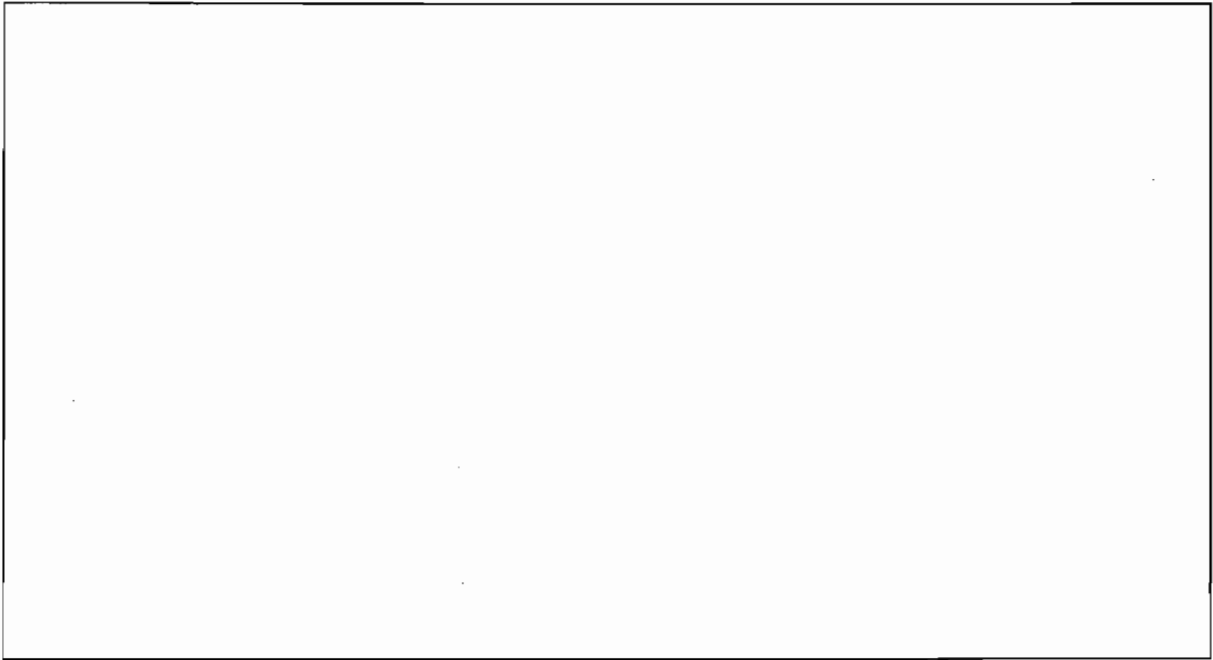
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Request is for permit condition revisions to PSD Permit No. PSD-FL-140 and FINAL Permit No. 0490015-005-AV as described in the attached correspondence.

APPLICATION INFORMATION

A large, empty rectangular box with a black border, intended for providing application information. It occupies the upper half of the page.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	CT-1A with an associated unfired HRSG	N/A	N/A
002	CT-1B with an associated unfired HRSG	N/A	N/A
003	CT-2A	N/A	N/A
005	CT-2B	N/A	N/A

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

A permit processing fee is not required for a modification to a Title V source pursuant to Rule 62-213.205(4), F.A.C.

APPLICATION INFORMATION

N/A

Owner/Authorized Representative Statement

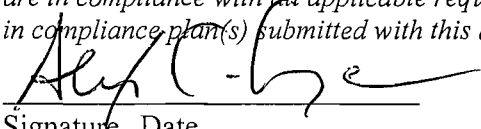
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () ext. Fax: ()
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i> _____ Signature _____ Date

APPLICATION INFORMATION

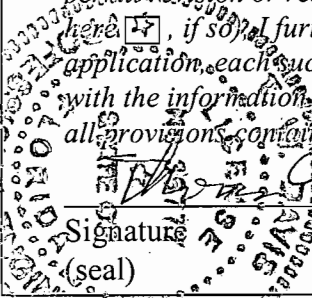
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Alex C. George, Vice President
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input checked="" type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Hardee Power Partners Limited Street Address: One South Wacker Drive, Suite 2020 City: Chicago State: IL Zip Code: 60606
4. Application Responsible Official Telephone Numbers... Telephone: (312) 224-1415 ext. Fax: (312) 224-1444
5. Application Responsible Official Email Address: ageorge@invenergyllc.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature Date <u>7/17/06</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address... Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 Northwest 98th Street City: Gainesville State: Florida Zip Code: 32606-5004
3. Professional Engineer Telephone Numbers... Telephone: (352) 332 – 0444 ext. Fax: (352) 332 - 6722
4. Professional Engineer Email Address: tdavis@ectinc.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature: _____ Date: <u>7/12/06</u> (seal)

Attach any exception to certification statement.

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1.	<input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source	
3.	<input checked="" type="checkbox"/> Title V Source	
4.	<input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5.	<input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6.	<input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7.	<input type="checkbox"/> Synthetic Minor Source of HAPs	
8.	<input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9.	<input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10.	<input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11.	<input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12.	Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

N/A

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

<p>1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p>
<p>2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p>
<p>3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p>

Additional Requirements for Air Construction Permit Applications

<p>1. Area Map Showing Facility Location:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (existing permitted facility)</p>
<p>2. Description of Proposed Construction or Modification:</p> <p><input type="checkbox"/> Attached, Document ID: _____</p>
<p>3. Rule Applicability Analysis:</p> <p><input type="checkbox"/> Attached, Document ID: _____</p>
<p>4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)</p>
<p>5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>
<p>6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>
<p>7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>
<p>8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>
<p>9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>
<p>10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>

