

Florida Department of Environmental Protection

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

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

PERMITTEE

Vandolah Power Company L.L.C. 2394 Vandolah Road Wauchula, Florida 33873

Authorized Representative: Doug Jensen, Plant Manager Air Permit No. PSD-FL-275A Project No. 0490043-006-AC Expires: December 1, 2008 Vandolah Power Project Facility ID No. 0490043 Compliance Testing Revisions

FACILITY AND LOCATION

This permit revises carbon monoxide and visible emissions compliance testing requirements for the simple cycle peaking combustion turbines (Units 1 - 4). The units operate at the existing Vandolah Power Project, which is located at 2394 Vandolah Road in Wauchula, Hardee County, Florida. The map coordinates are: Zone 17, 407.85 km East and 3044.5 km North; Latitude: 27° 31' 22" North and Longitude: 81° 55' 28" West.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Parts 60 and 63 of the Code of Federal Regulations (CFR).

Joseph Kahn, Director

Division of Air Resource Management

Florida Department of Environmental Protection

TO:

Joseph Kahn, Director, DARM

Through:

Trina L. Vielhauer, Chief, BAR

From:

Jeff Koerner, Air Permitting North Section

Bruce Thomas, Air Permitting North Section

DATE:

January 28, 2008

SUBJECT:

Compliance Testing Revisions

DEP File No. 0490043-006-AC (PSD-FL-275A)

Attached is the Final PSD permit revision for the simple cycle peaking combustion turbines (Units 1-4). Currently, compliance testing for carbon monoxide and visible emissions is required annually for oil and gas firing. This creates conflicts when these units are infrequently operated and sets up the scenario of requiring operation for the sole purpose of conducting tests. The revision only requires annual compliance testing for each fuel that is fired for more than 400 hours during any federal fiscal year. In addition, compliance testing will be required prior to permit renewal. This project revises original Permit No. 0490043-001-AC (PSD-FL-275).

No comments were received from the EPA or the public. We recommend your approval of the attached Final Notice and Permit.

Attachments

JK/tv/jfk/bxt

NOTICE OF FINAL PERMIT

In the Matter of an Application for Permit by:

Vandolah Power Company L.L.C. 2394 Vandolah Road Wauchula, Florida 33873

Authorized Representative:

Doug Jensen, Plant Manager

Draft Permit No. 0490043-006-AC Compliance Testing Revisions Vandolah Power Project Hardee County, Florida

Enclosed is final air Permit No. 0490043-006-AC, which revises the annual compliance testing for carbon monoxide and visible emissions for the simple cycle peaking combustion turbines (Units 1 - 4). The revision only requires compliance testing for each fuel that is fired for more than 400 hours during any federal fiscal year. In addition, compliance testing will be required prior to permit renewal. The combustion turbines are installed at the Vandolah Power Project, which is located in Hardee County at 2394 Vandolah Road in Wauchula, Florida. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.). Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S. by filing a Notice of Appeal pursuant to Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days from the date this order is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

105

Trina Vielhauer, Chief Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) was sent by electronic mail with received receipt requested before the close of business on 109 08 to the persons listed:

Mr. Douglas Jensen (doug.jensen@northernstargen.com)

Mr. Thomas Davis (tdavis@ectinc.com)

Ms. Cindy Zhang-Torres, Southwest District Office (Cindy.Zhang-Torres@dep.state.fl.us)

Mr. Chris Coombs (chris.coombs@northernstargen.com)

Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

PERMITTEE

Vandolah Power Company L.L.C. 2394 Vandolah Road Wauchula, Florida 33873

PERMITTING AUTHORITY

Florida Department of Environmental Protection Division of Air Resource Management Bureau of Air Regulation, Air Permitting North Section 2600 Blair Stone Road, MS #5505 Tallahassee, Florida 32399-2400

PROJECT

Project No. 0490043-006-AC PSD Permit Revision No. PSD-FL-275A Vandolah Power Project

This permit revises carbon monoxide and visible emissions compliance testing requirements for the simple cycle peaking combustion turbines (Units 1 - 4). The revision only requires annual compliance testing for each fuel that is fired for more than 400 hours during any federal fiscal year. In addition, compliance testing will be required prior to permit renewal.

NOTICE AND PUBLICATION

The Department distributed the Intent to Issue Permit package on December 18, 2007. The applicant published the Public Notice of Intent to Issue in <u>The Hardee Advocate</u> on December 27, 2007. The Department received the proof of publication on January 7, 2008.

COMMENTS

No comments on the Draft Permit were received from the public, the Department's Southwest District Office, the EPA Region 4 Office or the applicant.

CONCLUSION

The final action of the Department is to issue the permit as drafted.

REVISED DRAFT PERMIT CONDITIONS

This permitting action revises the following specific condition in air construction Permit No. PSD-FL-275 (Project No. 0490043-001-AC). All other conditions in that permit remain unchanged. Additions are shown with double underline and deletions are shown with strikethrough.

SECION III. EMISSIONS UNIT SPECIFIC CONDITIONS

COMPLIANCE DETERMINATION

- 29. <u>Initial Performance Tests</u>: Initial (I) performance tests (for both fuels) shall be performed on each unit while firing natural gas as well as while firing oil. Initial tests shall also be conducted after any modifications (and shake down period not to exceed 100 days after re-starting the CT) of air pollution control equipment such as change or tuning of combustors. Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 September 30) pursuant to Rule 62-297.310(7), F.A.C., on each unit as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing.
 - EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A). An annual test shall be conducted on each unit for each fuel that is fired for more than 400 hours during a federal fiscal year.
 - EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" (I, A). An annual test shall be conducted on each unit for each fuel that is fired for more than 400 hours during a federal fiscal year.
 - EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines." Initial test only for compliance with 40CFR60 Subpart GG and (I, A) short-term NO_X BACT limits (EPA reference Method 7E, "Determination of Nitrogen Oxides Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirements).
 - EPA Reference Method 18, 25 and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.

[PSD-FL-275A]

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Harvey, Mary

From:

Harvey, Mary

Sent:

Tuesday, January 29, 2008 12:00 PM

To:

'Mr. Douglas Jensen'; 'Mr. Thomas Davis'; Zhang-Torres; 'Mr. Chris Coombs'; 'Ms. Kathleen

Forney, EPA Region 4'

Cc:

Thomas, Bruce X.; Walker, Elizabeth (AIR); Gibson, Victoria; Koerner, Jeff

Subject:

Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Attachments: 0490043.006.AC.F_pdf.zip

Recipient

Tracking:

_____ Re

Chris Coombs

Read: 1/29/2008 12:51 PM

Walker, Elizabeth (AIR)

Read: 1/29/2008 12:31 PM

Walker, Elizabeth (AIR)

Read: 1/29/2008 12:17 PM

Koerner, Jeff

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html.

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Thank you,

DEP, Bureau of Air Regulation

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From: \tensen;\tensen@northernstargen.com]

Sent: Tuesday, January 29, 2008 12:11 PM

To: Harvey, Mary

Subject: RE: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Received. Thank you.

Sent by Doug's GoodLink

----Original Message----

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]

Sent: Tuesday, January 29, 2008 11:59 AM Eastern Standard Time

To: Jensen, Doug; Mr. Thomas Davis; Zhang-Torres; Coombs, Chris; Ms. Kathleen Forney,

EPA Region 4

Cc: Thomas, Bruce X.; Walker, Elizabeth (AIR); Gibson, Victoria; Koerner, Jeff Subject: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

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Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

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The information contained in this email message may be privileged, confidential and protected from disclosure. If you think that you have—received-this-email message in error, please notify the sender by reply email and delete the message and any attachments.

From:

Coombs Christcoombs@northernstargen.com]

To:

Harvey, Mary

Sent:

Tuesday, January 29, 2008 12:13 PM

Subject:

Read: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Your message

To:

chris.coombs@northernstargen.com

Subject:

was read on 1/29/2008 12:13 PM.

From:

Gloson, Victoria

To:

Harvey, Mary

Sent:

Tuesday, January 29, 2008 12:17 PM

Subject:

Read: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

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Your message

To:

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Cc:

Thomas, Bruce X.; Walker, Elizabeth (AIR); Gibson, Victoria; Koerner, Jeff Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Subject:

Validolati rower Company - DER File No. 0430043-000-AC (F3D-1

Sent:

1/29/2008 12:00 PM

was read on 1/29/2008 12:17 PM.

From:

Carrier Bruco X-registe

To:

Harvey, Mary

Sent:

Tuesday, January 29, 2008 12:31 PM

Subject:

Read: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Your message

To:

'Mr. Douglas Jensen'; 'Mr. Thomas Davis'; Zhang-Torres; 'Mr. Chris Coombs'; 'Ms. Kathleen Forney, EPA Region 4'

Cc: Subject: Thomas, Bruce X.; Walker, Elizabeth (AIR); Gibson, Victoria; Koerner, Jeff Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Subject: Sent:

1/29/2008 12:00 PM

was read on 1/29/2008 12:31 PM.

From:

Zhang-Torres

To:

Harvey, Mary

Sent:

Tuesday, January 29, 2008 12:51 PM

Subject:

Read: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Your message

To:

'Mr. Douglas Jensen'; 'Mr. Thomas Davis'; Zhang-Torres; 'Mr. Chris Coombs'; 'Ms. Kathleen Forney, EPA Region 4'

Cc:

Thomas, Bruce X.; Walker, Elizabeth (AIR); Gibson, Victoria; Koerner, Jeff Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Subject: Sent:

1/29/2008 12:00 PM

Was readion)1/29/2008/12/51 PM

1

From: Tom Davis [tdavis@ectinc.com]

Sent: Tuesday, January 29, 2008 1:28 PM

To: Harvey, Mary

Subject: RE: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]

Sent: Tuesday, January 29, 2008 12:00 PM

To: Mr. Douglas Jensen; Mr. Thomas Davis; Zhang-Torres; Mr. Chris Coombs; Ms. Kathleen Forney, EPA Region 4

Cc: Thomas, Bruce X.; Walker, Elizabeth \(AIR\); Gibson, Victoria; Koerner, Jeff **Subject:** Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

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a) as soon as possible.

From:

Thomas, Bruce X.

To:

Harvey, Mary

Sent:

Tuesday, January 29, 2008 1:30 PM

Subject:

Read: FW: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Your message

To:

'Ms. Kathleen Forney, EPA Region 4'

Cc:

Walker, Elizabeth (AIR); Thomas, Bruce X.

Subject:

FW: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

Sent:

1/29/2008 12:01 PM

was read on 1/29/2008 1:30 PM.

From: Sent: Forney.Kathleen@epamail.epa.gov Thursday, January 31, 2008 10:41 AM

To:

Harvey, Mary

Subject:

Re: FW: Vandolah Power Company - DEP File No. 0490043-006-AC: (PSD-FL-275A)

Thanks

Katy R. Forney Air Permits Section EPA - Region 4 61 Forsyth St., SW

Atlanta, GA 30303

Phone: 404-562-9130 Fax: 404-562-9019

"Harvey, Mary" <Mary.Harvey@dep .state.fl.us>

01/29/2008 12:00 PM Kathleen Forney/R4/USEPA/US@EPA

"Walker, Elizabeth \(AIR\)"
<Elizabeth.Walker@dep.state.fl.us
>, "Thomas, Bruce X."
<Bruce.X.Thomas@dep.state.fl.us>

FW: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

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Cc: Thomas, Bruce X.; Walker, Elizabeth (AIR); Gibson, Victoria; Koerner, Jeff

Subject: Vandolah Power Company - DEP File No. 0490043-006-AC

(PSD-FL-275A)