



November 1, 2002

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, Mail Station # 5505
Tallahassee, Florida 32399-2400

RECEIVED

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BUREAU OF AIR REGULATION

Re: Vandolah Power Project
Comments on Draft Title V Operation Permit
Draft Permit No. 0490043-003-AV

Dear Mr. Sheplak:

El Paso Corporation, on behalf of the Vandolah Power Project (Vandolah) located in Wauchula, Hardee County, Florida, is submitting the attached comments on the above-referenced draft Title V operation permit. Please note that a number of our comments involve the removal of items that are not applicable to the facility or that are no longer applicable to the facility (i.e., construction-only items). If possible, we would like these items removed so that the permit reflects only items that we are required to comply with as an operating facility. We would also appreciate it greatly if we could review the draft Title V operation permit again prior to finalizing the permit.

If you have any questions or need more information on our comments, please contact me at 713-420-4771, or Doug Jensen, the Vandolah plant manager, at 863-773-2277. Thank you very much for your help.

Best Regards,

A handwritten signature in black ink that reads "Jennifer Mollhagen". The signature is fluid and cursive.

Jennifer Mollhagen
Sr. Environmental Scientist

cc: Doug Jensen, Vandolah
Chris Coombs, Vandolah
Krish Ravishankar, El Paso
Paul Talarico, El Paso
Robert Emerson, El Paso
Clive Henton, El Paso

**COMMENTS ON TITLE V AIR OPERATION DRAFT PERMIT
DRAFT PERMIT NO. 0490043-003-AV
VANDOLAH POWER PROJECT**

Document	Section	Specific Item	Comment
Intent to Issue Title V Permit	Page 5 of 5	Certificate of Service	Please change the name of the Responsible Official for the Vandolah Power Project from Donald Jensen to Douglas Jensen.
Statement of Basis	2nd paragraph, 1st sentence		Please make the bolded correction to the following sentence: This facility consists of four, dual-fuel, nominal 170 megawatt (MW) General Electric model PG7241FA combustion turbine-electrical generators with evaporative inlet coolers and four [not two] 60-foot exhaust stacks, and two 2.8-million gallon fuel oil storage tanks.
Main portion of draft permit	All	All	Since this permit will not be effective until after construction of the facility is complete and all construction-only items have been completed, we would like for all construction-only items to be removed from this permit. We would also like all items that are not applicable to the facility to be removed from the permit. We have made note of these items in the remaining portion of this attachment. We would like the Title V Operations Permit to reflect only items that we are currently required to follow as an operating facility.
Main portion of draft permit	Section II, Item 7, Bullet 3	Not Federally Enforceable	Please confirm that the facility is allowed to apply oil as a dust suppressant to unpaved roads, yards, open stockpiles, and other similar activities.
Main portion of draft permit	Section II, Item 12, 1st sentence	Certification by a Responsible Official	Please make the bolded correction to the following sentence to correct a typographical error: In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that states , based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Main portion of draft permit	Section III.A, Item A.5, 3rd sentence	Capacity	Please delete the following sentence, since this action was completed in the construction portion of this project: Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing.
Main portion of draft permit	Section III.A, Item A.8, 1st sentence	Hours of Operation	In the Best Available Control Technology appendix of the facility's PSD permit (Permit No. PSD-FL-275), it states that the Department will limit operation of the units to 3,390 hours per year per unit. It further states that no single unit may operate more than 5,000 hours per year. We would like for the Title V permit to include a similar statement. Please make the bolded changes to the referenced sentence as follows: The stationary gas turbines shall only operate up to an average of 3,390 hours including up to 1000 hours on fuel oil during any calendar year, and no single unit may operate more than 5,000 hours per year.
Main portion of draft permit	Section III.A, Item A.11, 1st sentence	Control System Characteristics	Please delete the following sentence, since this action was completed in the construction portion of this project: Manufacturer's emissions performance versus load diagrams for the DLN and wet injection systems prior to their installation.

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Main portion of draft permit	Section III.A, Item A.13, 2nd bullet, 1st sentence	Nitrogen Oxides (NOx) Emissions	Please make the bolded correction to the following sentence to clarify the averaging period while burning oil: The concentration of NOX in the exhaust gas shall not exceed 42 ppmvd at 15% O2 on the basis of a 3-hr block average (of valid hour hours during which the unit is actually operated only) as measured by the continuous emission monitoring system (CEMS).
Main portion of draft permit	Section III.A, Item A.15, 1st sentence	Volatile Organic Compounds (VOC) Emissions	Please make the bolded correction to the following sentence to make the units consistent with what is given in Table A.12: The concentration of VOC in the stack exhaust gas with the combustion turbine operating on natural gas shall exceed neither 1.4 ppmvd [not ppmvw] nor 2.8 lb/hr (ISO conditions) and neither 7 ppmvw nor 16.2 lb/hr (ISO conditions) while operating on oil to be demonstrated by initial stack test using EPA Method 18, 25 or 25A.
Main portion of draft permit	Section III.A, Item A.20	Excess Emissions	This paragraph specifies that excess emissions must be included in the 24-hour average for NOX. However, the 24-hour average only applies while the turbines are burning natural gas, according to Item A.13. Item A.13 also states that a 3-hour average applies when the turbines are burning oil. Please clarify that the averaging periods for excess NOx emissions are 24 hours while the turbines are burning natural gas and 3 hours while the turbines are burning fuel oil.
Main portion of draft permit	Section III.A, Item A.21, 3rd sentence	Excess Emissions Report	Please make the bolded corrections to the following sentence to reference the correct conditions: Following the NSPS format, 40 CFR 60.7 Subpart A, periods of startup, shutdown, or malfunction shall be monitored, recorded, and reported as excess emissions when emission levels exceed the permitted standards listed in Specific Conditions A.12 [not 18] and A.13 [not 19] .
Main portion of draft permit	Section III.A, Item A.22, 1st sentence	Compliance with Emission Standards	Please remove the construction-only portion of the referenced sentence and change it to read as follows: Compliance with the allowable emission limiting standards shall be determined annually as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1998 version), and adopted by reference in Chapter 62-204.800, F.A.C.
Main portion of draft permit	Section III.A, Item A.23, 3rd bullet	Annual Performance Tests	Please clarify the test methods to be used and the circumstances under which to use them in the following sentence: 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 (A) short-term NOX 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).

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Main portion of draft permit	Section III.A, Item A.24, 1st paragraph	Continuous Compliance with the NOx Emission Limits	The first sentence of the referenced paragraph in Item A.24 specifies that continuous compliance with the NOx emission limits shall be demonstrated with the CEM system based on the applicable averaging time of a 24-hr block average (DLN). This is fine while the turbines are firing natural gas, since Item A.13 specifies that the NOx emission rate shall not exceed 9 ppmvd @ 15% O2 on a 24-hour block average while firing natural gas. However, Item A.13 then states that the NOx emission rate shall not exceed 42 ppmvd @ 15% O2 on a 3-hour average [please note that "block" is not included] while firing fuel oil. Please clarify that the averaging periods for continuous NOx compliance are 24 hours while the turbines are burning natural gas and 3 hours while the turbines are burning fuel oil.
Main portion of draft permit	Section III.A, Item A.24, 1st paragraph, last sentence	Continuous Compliance with the NOx Emission Limits	Please make the bolded corrections to the following sentence to reference the correct conditions: These excess emissions periods shall be reported as required in Conditions A.19 [not 25] and A.20 [not 26] .
Main portion of draft permit	Section III.A, Item A.26, 1st and 2nd sentences	Compliance with CO Emission Limits	Please delete the following two sentences, since these actions were completed in the construction portion of this project: An initial test for CO shall be conducted concurrently with the initial NOx test, as required. The initial NOx and CO test results shall be the average of three valid one-hour runs.
Main portion of draft permit	Section III.A, Item A.27	Compliance with the VOC Emission Limits	Please clarify what is meant by "periodic tuning data."
Main portion of draft permit	Section III.A, Item A.31.(a)2, 1st sentence	Applicable Test Procedures, Required Sampling Time, Opacity Compliance Tests	Please change the referenced sentence to read as follows, in order to specify the required test method and to remove a condition that is not applicable to this facility: When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard.
Main portion of draft permit	Section III.A, Item A.31.(a)2, paragraph a	Applicable Test Procedures, Required Sampling Time, Opacity Compliance Tests	Please delete this paragraph, since it is not applicable to this facility.
Main portion of draft permit	Section III.A, Item A.31.(a)2, paragraph b	Applicable Test Procedures, Required Sampling Time, Opacity Compliance Tests	Please delete this paragraph, since it is not applicable to this facility.
Main portion of draft permit	Section III.A, Item A.31.(c)	Applicable Test Procedures, Required Flow Rate Range	Please delete this paragraph, since it is not applicable to this facility.

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Main portion of draft permit	Section III.A, Item A.31.(e)	Applicable Test Procedures, Allowed Modification to EPA Method 5	Please delete this paragraph, since it is not applicable to this facility.
Main portion of draft permit	Section III.A, Item A.34, 1st sentence	Test Notification	Please remove the construction-only portion of the referenced sentence and change it to read as follows: The DEP's Southwest District shall be notified, in writing, at least 15 days before annual compliance test(s).
Main portion of draft permit	Section III.A, Item A.36(a)4	General Compliance Testing	Please specify the compounds for which a compliance test must be conducted.
Main portion of draft permit	Section III.A, Item A.36(a)5	General Compliance Testing	Please clarify whether visibility testing as a surrogate for PM/PM10 testing is required when a fuel burning emissions unit burns liquid and/or solid fuel less than 400 hours per year.
Main portion of draft permit	Section III.A, Item A.39(c), 2nd sentence	Test Reports	Please change the referenced sentence to read as follows, in order to specify the test required: As a minimum, the test report, other than for an EPA Method 9 test, shall provide the following information.
Main portion of draft permit	Section III.A, Item A.40, 1st sentence	Compliance Test Reports	Please make the bolded correction to the following sentence to reference the correct condition: A test report indicating the results of the required compliance tests shall be filed as per Condition A.35 [not 38] above.
Main portion of draft permit	Section III.A, Item A.42, 3rd sentence	CEMS for Reporting Excess Emissions	Please make the bolded corrections to the following sentence to reference the correct conditions: Periods when NOX emissions (ppmvd @ 15% oxygen) are above the BACT standards, listed in Specific Conditions A.12 [not 34] and A.13 [not 35], shall be reported to the DEP Southwest District within one working day (verbally) followed up by a written explanation not later than three (3) working days (alternatively by facsimile within one working day).
Main portion of draft permit	Section IV, Item 2, footnote under SO2 allowances table		Please specify the relevant part of 40 CFR 73.
Appendix H-1, Permit History/ID Number Changes	Table		Please change the permit number listed in the table from 0490043-003-AC to 0490043-001-AC
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Line 2		Please make the bolded addition to the following sentence to clarify the building's name: Operation of an Clark Diesel-based fire protection system for the operations/maintenance building. The unit is rated at 265 BHP.
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Line 3		Please make the bolded correction to the following sentence to clarify the purpose of the fuel gas heater: Operation of a 17 MMBtu/hr indirect fired fuel gas heater to ensure the natural gas during operations remains above the dew point.

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Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Line 5		Please make the bolded addition to the following sentence to clarify the building's name: Miscellaneous maintenance and cleaning and painting of the operations/maintenance building including the control room, maintenance shop, storage warehouse, offices and their contents.
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Line 8		Please clarify the meaning of the following sentence: Surface coating operations; both 5% and 5% VOC
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Line 9		Please list the water analyses operations separately, and change the referenced sentence to read as follows: Demin water analyses operations to ensure proper operation of the water injection system.
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Additional Line		Please add the following sentence as a separate line in the table: Raw water analyses in the combustion turbine glycol cooling loop for corrosion control and cooling.
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Additional Line		Please add the following sentence as a separate line in the table: Evaporative inlets for turbine cooling.
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Line 10		Please make the bolded addition to the following sentence to clarify that there are two ponds onsite: Storm water detention basin and/or percolation pond maintenance (if required).
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Additional Line		Please add the following sentence as a separate line in the table: Operation of a CO2-based generator purge system to be used when removing the generators from service, or in the event of an emergency purge of the normally H2-filled generator.
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Additional Line		Please add the following sentence as a separate line in the table: Operation of a H2-filled generator, which will be purged for maintenance or in the case of an emergency.
Appendix I-1, List of Insignificant Emissions Units and/or Activities	Table, Additional Line		Please add the following sentence as a separate line in the table: Operation of a foam suppression fire protection system for the fuel oil storage tanks.

Sheplak, Scott

From: Mollhagen, Jennifer [Jennifer.Mollhagen@ElPaso.com]

Sent: Friday, November 01, 2002 3:32 PM

To: Bull, Robert; Sheplak, Scott

Cc: Jensen, Doug; Coombs, Chris

Subject: Vandolah Power Project - Comments on Draft Title V Operation Perm

Here is an electronic copy of our comments on the draft Title V Operation Permit for the Vandolah Power Project in Wauchula, Florida (Permit No. 0490043-003-AV). The documents are in two formats, Microsoft Office format and PDF format. Please contact me if you have any trouble opening the files. I am also forwarding a hard copy of our comments to the Bureau of Air Regulation in Tallahassee for delivery on Monday, November 4. If possible, we would greatly appreciate the opportunity to review the permit once more before it is finalized. Please contact me at 713-420-4771 if you have any comments or need more information. Thank you very much for your assistance. Have a good weekend.

<<Cover.doc>> <<Comments on Draft Permit.xls>> <<Comments on Draft Permit.pdf>> <<Cover.pdf>>

Jennifer Mollhagen

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Environmental - Domestic Power

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11/4/2002