

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 1/24/08 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.

FINAL DETERMINATION

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]

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

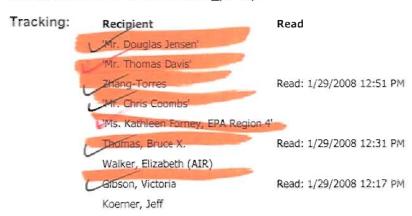
Territory of Mills and

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



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.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

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From: Jensen, Doug [doug.jensen@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)

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).

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Thank you,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey http://survey.dep.state.fl.us/?refemail=Mary.Harvey@dep.state.fl.us. Thank you in advance for completing the survey.

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, Chris [chris.coombs@northernstargen.com]

To:

Harvey, Mary

Sent:

Subject:

Tuesday, January 29, 2008 12:13 PM Read: Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A)

and the state of t

Your message

To:

chris.coombs@northernstargen.com

Subject:

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

From:

Gibson, 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)

Transitation Carbonian Contra

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

Subject:

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

Sent:

1/29/2008 12:00 PM

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

The second second

From:

Thomas, Bruce X.

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)

1/29/2008 12:00 PM Sent:

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)

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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; Koemer, Jeff Vandalah Power Company - DEP File No. 0490043-006-4C (PSD-EL-2754)

Sent:

Vandolah Power Company - DEP File No. 0490043-006-AC (PSD-FL-275A) 1/29/2008 12:00 PM

was read on 1/29/2008 12:51 PM.

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)

Dear Sir/Madam:

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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: Cc: 'Ms. Kathleen Forney, EPA Region 4' 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.

exity and an experience of

From: Sent:

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

-27

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 Fornev/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

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(PSD-FL-275A)

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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

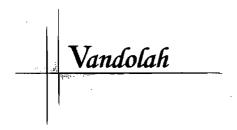
Subject: Vandolah Power Company - DEP File No. 0490043-006-AC

(PSD-FL-275A)

Kofax

Separator

PSD



September 17, 2007

Mr. Bruce Thomas Florida Department of Environmental Protection Division of Air Resource Management 2600 Blair Stone Road MS 5500 Tallahassee, FL 32399-6979 RECEIVED

SEP 24 2007

BUREAU OF AIR REGULATION

RE: Concurrent Construction Permit/Title V Operating Permit Revision Vandolah Power Company, Wauchula, Hardee County, Florida

Facility ID 0490043
Project No.: 0490043-006

10490043-

Dear Mr. Thomas:

Vandolah Power Company submitted a Title V Operating permit renewal application on June 4, 2007. In this Title V operating permit renewal application, Vandolah requested several changes to their current Title V operating permit. After your review of the requested changes, you advised us that the following requested change would require a concurrent PSD construction permit and Title V operating permit revision:

Add the following:

For each combustion turbine that fires natural gas for less than 400 hours during the previous fiscal year, the annual performance (compliance) tests for firing natural gas for the current fiscal year of operation are not required.

For each combustion turbine that fires distillate oil for less than 400 hours during the previous fiscal year, the annual performance (compliance) tests for firing distillate oil for the current fiscal year of operation are not required.

Therefore, Vandolah is submitting the enclosed concurrent PSD construction permit and Title V operating permit revision application for your processing. We have also included the requested compliance test results for the previous 5 years as well as the hours of operation while firing both pipeline quality natural gas and fuel oil for the previous 5 years.

If you have any questions concerning this submittal, please call me at 863-773-2277 ext. 2222 or Chris Coombs, Environmental & Safety Manager, Vandolah Power Company at 863-773-2277, ext. 2228.

Sincerely,

Douglas A Jensen Plant Manager

Vandolah Power Company

cc:

C. Coombs, Vandolah Power Company

T. W. Davis, ECT W. F. Karl, ECT

RECENTO

SEP 24 2007

BUREAU OF AIR REGULATION

VANDOLAH POWER PROJECT CONCURRENT PREVENTION OF SIGNIFICANT DETERIORATION/TITLE V PERMIT REVISION APPLICATION

Prepared for:

VANDOLAH POWER COMPANY L.L.C. WAUCHULA, FLORIDA

Prepared by:



Environmental Consulting & Technology, Inc. 3701 Northwest 98th Street Gainesville, Florida 32606

ECT No. 070942-0100

September 2007



Department of Environmental Protection

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

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also 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
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

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 & 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.					
Ide	entification of Facility					
1	Facility Owner/Company Name: V	andolah	Powe	er Compan	y L.L.C.	
2.	Site Name: Vandolah Power Pro	ject				
3.	Facility Identification Number: 04	90043				
4.	Facility Location					
	Street Address or Other Locator: 2	394 Vand	lolah	Road		
	City: Wauchula	County: H	arde	e	Zip Code: 33873	
5.	Relocatable Facility?				le V Permitted Facility?	
	☐ Yes ☐ No			∑ Yes	☐ No	
Ap	plication Contact					
1.	Application Contact Name: Mr. (Chris Coo	mbs			
2.	2. Application Contact Mailing Address					
	Organization/Firm: Vandolah Power Company					
	Street Address: 2394 Vandola	ah Road				
	City: Wauchula	Sta	ate: F	lorida	Zip Code: 33873	
3.	Application Contact Telephone N	umbers				
	Telephone: (863) 773 - 2277	ext. 22	228	Fax: (8	363) 773 - 5908	
4. Application Contact Email Address: chris.coombs@northernstargen.com						
Application Processing Information (DEP Use)						
1.	1. Date of Receipt of Application: 3. PSD Number (if applicable):					
2.	2. Project Number(s): 0490043 - 006 ACI 4. Siting Number (if applicable):					
	0490048	-001-	<u> </u>	/		

1

DEP Form No. 62-210.900(1) - Form

Purpose of Application

I his application for air permit is submitted to obtain: (Check one)
Air Construction Permit Air construction permit. Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL). Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL),
and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL. 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

This application is being submitted to administratively change PSD permit number PSD-FL-275 and Title V Operating permit 0490043-005-AV to include the following permit conditions:

For each combustion turbine that fires natural gas for less than 400 hours during the previous fiscal year, the annual performance (compliance) tests for firing natural gas for the current fiscal year of operation are not required.

For each combustion turbine that fires distillate oil for less than 400 hours during the previous fiscal year, the annual performance (compliance) tests for firing distillate oil for the current fiscal year of operation are not required.

2

DEP Form No. 62-210.900(1) - Form

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	One nominal 170 Megawatt Gas Simple Cycle Combustion Turbine-Electrical generator	N/A	N/A
002	One nominal 170 Megawatt Gas Simple Cycle Combustion Turbine-Electrical generator	N/A	N/A
003	One nominal 170 Megawatt Gas Simple Cycle Combustion Turbine-Electrical generator	N/A	N/A
004	One nominal 170 Megawatt Gas Simple Cycle Combustion Turbine-Electrical generator	N/A	N/A
_			

Application Processing Fee		•
Check one: Attached - Amount: \$	Not Applicable	

DEP Form No. 62-210.900(1) - Form

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 Organization/Firm:	e Mailing Address		
	Street Address:			
	City:	State:	Zip Code:	
3.	Owner/Authorized Representativ	e Telephone Numbers		
	Telephone: () - ext.	Fax: () -		
4.	Owner/Authorized Representativ	e Email Address:		
5.	Owner/Authorized Representativ	e Statement:		
	this air permit application. I her reasonable inquiry, that the state complete and that, to the best of application are based upon reason pollutant emissions units and air will be operated and maintained of air pollutant emissions found to Department of Environmental Pr	reby certify, based on increments made in this appears made in this appears when the second control equipment is as to comply with a contection and revisions which the facility is subject be transferred with a notify the department is subject to the department is subject.	imates of emissions reported in this calculating emissions. The air pment described in this application ill applicable standards for control ate of Florida and rules of the thereof and all other requirements ject. I understand that a permit, if out authorization from the	
	Signature	_	Date	

4

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."

	E			
1.	Application Responsible Official Name: Mr. Douglas A. Jensen			
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):			
	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.			
	For a partnership or sole proprietorship, a general partner or the proprietor, respectively.			
	For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.			
	The designated representative at an Acid Rain source.			
3.	Application Responsible Official Mailing Address Organization/Firm: Vandolah Power Company			
	Street Address: 2394 Vandolah Road			
	City: Wauchula State: Florida Zip Code: 33873			
4.	Application Responsible Official Telephone Numbers Telephone: (863) 773 - 2277 ext. 2222 Fax: (863) 773 - 5908			
5.	. Application Responsible Official Email Address: doug.jensen@northernstargen.com			
6.	. Application Responsible Official Certification:			
	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.			
	Signature Date			
1				

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<u>Pr</u>	ofessional 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 NW 98 th Street			
	City: Gainesville State: Florida Zip Code: 32606			
3.	Professional Engineer Telephone Numbers			
	Telephone: (352) 332 - 0444 ext. 11351 Fax: (352) 332 - 6722			
4.	Professional Engineer Email Address: tdavis@ectinc.com			
5.	Professional Engineer Statement:			
	I, the undersigned, hereby certify, except as particularly noted herein*, that:			
	(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			
	(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.			
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here , 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.			
	(4) If the purpose of this application is to obtain an air construction permit (check here , 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 , 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.			
	(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 , 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. Signature. Date			
	(seal) 37% STATE OF SALE			

^{*} Attach any exception to certification statement.

DEP Form No. 62-210.900(1)00 Form

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

|--|

1.	Facility UTM Coor		2.	Facility Latitude/Lo	•
		(km) 407.85 th (km) 3044.5		Latitude (DD/MM/ Longitude (DD/MN	. *
	<u> </u>	· ,			, , , , , , , , , , , , , , , , , , ,
3.	Governmental	4. Facility Status	5.	Facility Major	6. Facility SIC(s):
	Facility Code:	Code:		Group SIC Code:	
	0	A		49	4911
7.	Facility Comment:	-			
	, -				
			•		

Facility Contact

1.	Facility Contact Name: Mr. Chris Coombs
2.	Facility Contact Mailing Address
	Organization/Firm: Vandolah Power Company
	Street Address: 2394 Vandolah Road
	City: Wauchula State: Florida Zip Code: 33873
3.	Facility Contact Telephone Numbers:
	Telephone: (863) 773 - 2277 ext. 2228 Fax: (863) 773 - 5908
4.	Facility Contact Email Address: chris.coombs@northernstargen.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1.	Facility Primary Responsible Official Name:			
2.	Facility Primary Responsible Official Mailing Address			
	Organization/Firm:			
	Street Address:			
	City:	State:	Zip Code:	
3.	. Facility Primary Responsible Official Telephone Numbers			
	Telephone: () - ext.	Fax: () -		
4.	Facility Primary Responsible	Official Email Address:		

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

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List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
NOX	A	N
СО	A	N
VOC	A	N
SO2	A	N
PM	A	N
PM10	A	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Car [Y or N]? (all units)	3. Emissions Ur ID No.s Under Cap (if not all units)	_	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NOX	· Y		· N/A	1,008.4	OTHER
СО	Y		N/A	346.0	OTHER
VOC	Y		N/A	45.6	OTHER
SO2	Y		N/A	221.2	OTHER
PM/PM10	Y		N/A	82.0	OTHER
	-				

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

Facility-Wide emissions cap is based on each CT operating up to an average of 3,390 hours per year, of which, 1,000 hours per year on distillate fuel oil.

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

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)
	Attached, Document ID: Previously Submitted, Date: 6/4/2007
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation
2.	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)
	providud involventa mat vould not de antique as a result of the revision comig sought,
	Attached, Document ID: Previously Submitted, Date: 6/4/2007
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permi
	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 resu
	of the revision being sought)
	Attached, Document ID: Previously Submitted, Date: 6/4/2007
<u>A</u>	ditional Requirements for Air Construction Permit Applications
1.	Area Map Showing Facility Location:
	Attached, Document ID: Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL
	Attached, Document ID:
3	Rule Applicability Analysis:
3.	Rule Applicability Analysis:
	Rule Applicability Analysis: Attached, Document ID:
	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.):
4.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility)
4.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification:
4.5.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable
4.5.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.):
4.5.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable
4.5.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.):
4.5.6.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document ID: Not Applicable
4.5.6.7.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document ID: Not Applicable Source Impact Analysis (Rule 62-212.400(5), F.A.C.): Attached, Document ID: Not Applicable
4.5.6.7.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document ID: Not Applicable Source Impact Analysis (Rule 62-212.400(5), F.A.C.):
4.5.6.7.8.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document ID: Not Applicable Source Impact Analysis (Rule 62-212.400(5), F.A.C.): Attached, Document ID: Not Applicable Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):
4.5.6.7.8.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document ID: Not Applicable Source Impact Analysis (Rule 62-212.400(5), F.A.C.): Attached, Document ID: Not Applicable Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): Attached, Document ID: Not Applicable
4.5.6.7.8.9.	Rule Applicability Analysis: Attached, Document ID: List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility) Fugitive Emissions Identification: Attached, Document ID: Not Applicable Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document ID: Not Applicable Source Impact Analysis (Rule 62-212.400(5), F.A.C.): Attached, Document ID: Not Applicable Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): Attached, Document ID: Not Applicable Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): Attached, Document ID: Not Applicable Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):

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Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility)
Additional Requirements for Title V Air Operation Permit Applications
List of Insignificant Activities (Required for initial/renewal applications only):
 Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): Attached, Document ID: Not Applicable (revision application with no change in applicable requirements) Compliance Report and Plan (Required for all initial/revision/renewal applications):
Attached, Document ID: <u>Previously submitted on 6/4/2007.</u> Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance state during application processing.
 4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only): ☐ Attached, Document ID: ☐ Equipment/Activities On site but Not Required to be Individually Listed ☐ Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only):
 ☐ Attached, Document ID: ☐ Not Applicable 6. Requested Changes to Current Title V Air Operation Permit: ☐ Attached, Document ID: ☐ Not Applicable
Additional Requirements Comment
The following additional information was requested by FDEP and is being provided in support this concurrent construction/operation permit revision application: Attachment A – Copies of the compliance test results for the previous 5 years
Attachment B – Hours of operation for each combustion turbine on fuel oil and pipeline quality natural gas for the previous 5 years

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ATTACHMENT A



Virginia Office 1401 Municipal Road NW Roanoke, VA 24012 Phone: (540) 265-1987 Fax: (540) 265-0082

Pennsylvania Office 449 Veit Road Huntingdon Valley, PA 19006 Phone: (215) 364-8940 Fax: (215) 364-4596

Test Report for Annual Compliance Testing Conducted on Combustion Turbine Units 1 through 4 at Vandolah Power Project in Wauchula, FL

Prepared for El Paso Power Operations Wauchula, FL

Test Dates: May 19-22, 2003 Draft Report Date: June 16, 2003 Final Report Date: June 27, 2003



1-877-Ful-Serve

FAC Contract Number ACGVT3121

Table 2 - Summary of NO_x, CO, and Visible Emissions at Vandolah Power Company: Unit 1 (May 19, 2003)

												صنب		
	,						NATURAL	GAS					•	
			,				NO, Emiss	lons						
Run	Start	End	NOx	O,	Combu	(mm Hg)	Ambient Humidity	Am	blent erature	NOx Concentration		NOx Mass Ei		
Number	Time	Time	(ppmdv)	(%av)	Obs.	Ref.	(g H ₂ O(g air)	(F)	(K)	(ppmdv @ 15% O ₂)	(MAMABILI)	(MMBimpr)	(tb/hr)	(lb/hr, _{ss}
U1-GAS-RUN1	08:31	09:38	7:43	13.63	771.B	784,3	0.0203	87.0	303.7	6.02	0.0222	1850.3	38.61	43.80
U1-GAS-RUNZ	09:54	11:08	7,47	13.60	771.8	784.3	0.0207	94.0		6.04	0.0222	1842.6	38.53	43.19
U1-GAS-RUN3	11:19	12:27	7.65	13.55	771:8	764:3	0.0207	94.0	307.6	6:14	0.0226	1836.1	37.01	43.76
.Average			7.52	13.59						6.07;	0.0223	1643.0	35.72	43.58
							CO Emiss	lons						
					Combus	tor Intet	Ambient	Am	blent	CO				
Run	Start	End	CO	Ο,	Pressure	(min Ha)	Humidity	Temp	eroture-	Concentration		CO Mass En	ristions	
Number	Time	Time	(ppmdv)	(%dv)	Obs.	Ref	(g H ₂ O/g air)	(F)	(K)	(ppmdv @ 15% O ₁)	(ID/MMBILI)	(MMBlu/hr)	(fb/hr)	(lb/hr; é
U1-GAS-RUN1	08:31	09:38	0,27	13.63	771.B	764:3	0,0203	87.0	.303:7	0.21	0.0005	1650.3	0.80	0.95:
U1-GAS-RUNZ	09:54	11:08	0.19	13.60	771.8	764:3	0.0207	94.0	307.6	0.15	0.0003	1642.6	0.57	0.67
U1-GAS-RUN3	11:19	12:27	0.20	13.55	771.B	784.3	0.0207	94.0	307.6	D.16	0.0004	1636.1	0.57	0.68
Average			0.22	13.59					٠	0.17	0.0004	1643.0	0.65	0.77
							Visible Emis	sions						
Run Number				U1-M9-R1			U1-MB-R2			U1-M9-R3				
Start Time				8:31			9:31			10:31				
End Time				B:31			10:31			11:31			Average	
Opacity (%)				0.0			0.0			0,0			0.0	

							FUEL O	İĻ						
							NO _s Emiss	ions						
Run. Number	Start.	End Time	(NOx:	·Ò _z (%dv)	Combus Pressure Obs.		Ambient Humidity (g H-Q/g air)		ensture ensture	NOx Concentration (ppmdv @ 15% O ₂)	(Ib/MMBtul ⁻¹	NOx Mass E		. (lib/hr; po
U1-OIL-RUN1 U1-OIL-RUN2 U1-OIL-RUN3	16:27 17:34 18:41	17:27 18:34 19:41	45.25 44.74 44.92	12.39 12.41 12.44	770.3 770.3 770.3	764.3 764.3 764.3	0.0210 0.0215 0.0148	84.0 82.0 73.0	302,0 300,9	31,37 31,09 31,33	0.1219 0.1209 0.1218	1868.5 1924.8 1982.0	227.84 232.59 241.34	278.84 288.99 270.88
Average			44.97	12,41			CO Emiss	lons:		31,26	0.1215	1925.0.	233.93	279,57
Run Number	Start Time	End Time	CO (pprodv)	O ₂	Combus Pressure Obs.		Amblent Humblity (g H ₂ O/g en)	Am	blent erature (K)	CO Concentration (ppmdv @ 15% O ₂)	(B/MMBhi) ¹	CO Mass Er (MMBh/hr)		(lb/hr, so
U1-CIL-RUN1 U1-CIL-RUN2 U1-CIL-RUN3	16:27 17:34 18:41	17:27 18:34 19:41	0.64 0.62 0.34	12.38 12.41 12.44	770.3 770.3 770.3	784.3 764.3 764.3	0.0210 0.0215 0.0148	84.0 82.0 73.0		0.58 0.43 0.24	0.0014 0.0010 0.0008	1888.5 1924.6 1982.0	2.57 1.95 1.11	3.15 2.44 1.25
Average.			0.60	12.41				,		0.42	0.0010	1925.D	1.85	2.28
Run Number				U1-M9-R4			Visible Emi: U1-M9-R5	salons	<u>:</u>	U1-M9-R6			. ,	
Start Time End Time				18:27 17:27			17:27 18:27			18:27: 19:27.			Avereige	
Opacity (%)				0,0			0.0			0.0		:	0.0	

Calculated using convention factors (apm 🖘 lahsel) found in Appendix F, and a fuel factor (Fd: dry, oxygen-boxed) of 8710 declaMMBlu for natural gas and 9180 declaMMBlu for natural gas and 9180 declaMMBlu for Natural

Table 3 - Summary of NO_x, CO, and Visible Emissions at Vandolah Power Company: Unit 2 (May 20, 2003)

							NATURAL	GAS						
	,						NO _x Emiss	ions	-				•	
					Combu	stor intet	Ambient	Am	bient	NOx				
Řun	Start:	End	ŃOx	Ο,	Pressuro	(mm'Hg)	Humidity	Temp	erature	Concentration		NOX Mass E	missions	
Number	Time	Time	(ppmdv)	(Mdv)	Obs	Ref	(g H ₂ O/g air)	(F)	(K)	(ppmdv @ 15% O ₂)	IBMMBtul 1	(MMBhirth)	(lb/hr)	(libithir, ₁₃
U2-GAS-RUN1	08:47	09:55	7:19	13.71	771.6	764.1.	0.0168	82:0	300.9	5.89	0.0217	1842.4	35:65	40.47
U2-GAS-RUNZ	10:04	11:13	7.02	13.72	771.5	764.1	0.0199	89.0	304:6	5.77	0.0213	1645.0	34.96	41.20
U2-GAS-RUN3	11:21	12:30	7.08	13.70	77,1.6	784.1	0.0238	95.0	308.2	5.79	0.0213	1838.1	34:92	43.50
Average			7.09	13,71						:5:82	0.0214	1641:2	35.18	41.72
							CO Emiss	lons						
					Combus	tor Inigt	Ambient	Am	blent	· · co		•		
:Run	Start	End	co	O ₁	Pressure	(mm Hp)	Humidity	Temp	erature	Concentration		CO Mass Er	nissions	
Number	Tima.	Time.	(ppmdv)	(%dv)	Obs	Ref	(g H ₂ O/g air)	(F)	(K)	(ppmdv @ 15% O ₂)	(Ib/MMBtu) 1	(MMBtuhr)	(Ib/Itr)	(Ib/hr a
U2-GAS-RUN1	'08:47	: 09:55	0,18	13.71	771.6	:784:1	0.0168	62.0	300.9	-0,14	0.0003	1642.4	0.53	0.60
U2-GAS-RUNZ	10.04	11:13	0.27	13:72	771.6	764:1	0.0198	60.0	304.6	0.22	0.0005	1645.0	0.82	0.98
U2-GAS-RUN3	11:21	12:30	0.25	13,70	771.6	784.1	0.0238	65.0	308.2	0.20	0.0004	1636.1	0.74	0.92
Average			0.23	13,71						0,19	0,0004	1641.2	0.69	0.83
							Visible Emis	sions.						
Run Number				U2-M9-R1			U2-M9-R2			U2-M9-R3				
Start Tiron				8:27			9:27			10.27				
End Time				9:27			. 10:27			11:27			Average	
. Opacity (%)				0.0			0.0			0.0			0.0	

							FUEL 0	lĹ						
							NO _x Emisi	lons					٠ نيدر	•
					Combu	tor injel	Amblent	:Am	bient	NOx				
Rưn	Start	End	NOx	O ₂	Pressure	(mm Hg).	Humidity	Тептр	oraturo	Concentration		NOx Mass E	missions	
.Number	Tane	Time	(ppmdv)	(%dv)	Obs.	Rel.	(g H ₂ O/g elir)	(F).	(K)	(ppmdv @ 15% O ₂)	(Ib/MMBlu) i	(MMBtuhr)	(latte)	(Ib/hr. po
U2-OIL-RUN1	14:38	15:38	47:63	12.55	770.1	764.1	0,0157	87.0	:303.7	33.65	0.1308.	1782.2	233:14	255.83
UZ-OIL-RUNZ	15:47	16.47	47.54	12.55	770.1	764.1	0.0140	87.0	303.7	33.59	0,1308	1837.7	239,94	254.82
U2-OIL-RUN3	16:56	17:56	47.46	12.63	770.1	764,1	0.0151	82.0	~300. 9 ·	33.96	0.1316	1873.3	246.54	271.25
Average			47.54	12.58						33.70	0.1310	1831.0	230,87	260,67
				•			CO Emiss	lons						
					Combus	tor Inlet	Amblent	Am	bient	CO			•	
Run	Stort	End'	co	O,	Pressure	(mm Hg)	Humidity	Temp	eroture.	Concentration		CO Mass En	nissions	
Number	Time	Time	(ppmdv)	(Wide)	Obs.	Ref.	(g HyO/g air)	(F)	(K)	(ppmdv @ 15% O ₂)	[DMMBH]	(MMBtu/hr)	(lb/hr)	βb/hv. po
U2-OIL-RUN1	14:38	15:38	0.33 0.38	12.65	770.1	7B4.1.	0.0157	87.0	303.7	0.23	0.0006:	1782.2	0.98	
U2-OIL-RUNZ	15:47	16:47	0.38	12.55	770.1	764.1	0.0140	87.0	303.7	0.27	0,0006	1837.7	1.17	1.08 1.24
U2-OIL-RUNS	16:56	17:56	0.41	12.63	770.1	764:1	0.0151	B2.0	300.9	0,29	0.0007	1873.3	1.30	. 1.43,
Average			0.37	12.58				,		0.26	0.0006:	1831,0	1,15	1,25
							Visible Emis	anolas						
Run Number Start Time				U2-M9-R4 14:38		•	U2-M9-R5:	-		U2-M9-R6 16:38	:			
End Time				15:38			19:38			17:38			Average	
Opacity (%)		1	٠.	0.0			0.0			0.0			0.0	

Colculated using conversion factors (ppm 🗢 larsof) found in Appendix F, and a fuel factor (Fd: dry, oxygen-basel) of 87.10 dec/AMMSti for natural gas and 9190 dec/AMMSti, for fuel oil

Table 4 - Summary of NO_x, CO, and Visible Emissions at Vandolah Power Company: Unit 3 (May 21, 2003)

· 							NATURAL	GAS:						
							NO _x Emiss	lons.	,					
Run	Start	End	NOx	0,	Prossure	tor Inlet (mm Ho)	Ambient Humidity	Temp	bient eratúre	NOx. Concentration		NOX Moss E		
Number	Time	Time	(ppmdy)	(%dv)	Obs.	Rei.	(g H ₁ O/g air)	(F)	(K)	(ppmdv @ 15% O ₂)	(Ib/MMBtu)	(MMBtwhr)	(Ib/hr)	(lib/hr, _{est}
U3-GAS-RUN1	08:43	09:51	7.97	13.55	790.0	781.7	0.0165	83.0	301.5	6.39	0.0236	1842.4	38.68	43.61
U3-GAS-RUN2	10:01	11:10	7,90	13.41	790.0	7B1,7	0.0208	80.0	305.4	6.22	0.0229	1845.0	37.71	44.98
U3-GAS-RUN3	11:19	12:27	7.08	13.42	780.0	781.7	0.0188	90.0	305.4	6.29	0.0232	1638.1	37:89	43.51
Average			·7.95	13.46						6.30	0:0232	1641.2	38.09	44.03
							CO Emiss	ions						
					Combus	tor inlet	Ambient	Am	blent-	ÇQ				
Run	Start	End	CO	Ο,	Pressure	(mm Hg)	Hurridity	Temp	erature	Concentration		CO Mass En	distions	
Number	Time	Time	(ppmdv)	(%dv)	Öbs.	Ref.	(o H,O/g zir)	(F)	(K)	(ppmdv @ 15% O ₂)	(th/MMBtu) ³	(MMBlu/hr)	(Hb/hr)	(lib/hir, 194
U3-GAS-RUN1	08:43	09:51	0.69	13.55	790.0	781:7	0.0166	83.0	301.5	0.55	0.0012	1642.4	2.04	2:30
U3-GAS-RUN2	10:01	11:10	0.42	13,41	790.0	781:7	0.0208	90.0	305.4	0.33	0.0007	1845.0	2.04 1.22	1.48
U3-GAS-RUN3	11:19	12:27	0.37	13.42	790.0	781.7	0.0186	90.0.	305.4	0.29	0.0007	1838.1	1.07	1.23
Averago			0.49	13,46						0.39	0.0009	1641.2	1.44:	1.66
							Visible Emis	sions			**			
Run Number	_			U3-M9-R1			U3-M9-R2			U3-M9-R3				
Start Time			•	8:43			9:43			10:43				
End Time				9:43			10:43			11:43			Average	
Opacity (%)				0.0			0.0			0.0			0.0	

							FUEL C	IL						
							NO _x Emisi	ions						
Run	Start	End	NOx	о,	Combus Pressure	(mm Hg):	Amblent Humidity	Temp	biont Breture	NOx Concentration		NOx Mass E		
Number	Thrio	Time	(bbinda)		Obs.	Ref.	(g H ₂ CVg air)	(F)	(K) [*]	(ppmdv @:16% O ₂)	(Ib/MMBtu) '	(MMBtu/hr)	(lb/hr)	(lb/hr, _{teo}
U3-OIL-RUN1	14:37	15:37	50.08	12.27	787.9	781.7	0.0159		303.2	34:24	0.1331	1749.7	232.85	257.18
U3-OIL-RUNZ U3-OIL-RUN3	15:48 16:56	16:46	49.80 49.38	12.23	787.9 787.9	781.7 781.7	0.0157		303.7	33.69 33.63	0.1317	1801.8 1848.4	237.35 241.61	260.42 264.58
Average	10.00	17;30	49.75	12.25	(07.8	701:7	.0.0153:		,302,6	33.92	0.1318	1800.0	237.27	260.73
24. 4					•		CO Emiss	ions:						
					Combus	tor Inlet:	. Ambient	Am	pient	CO	· · · · · · · · · · · · · · · · · · ·			
Run	Start	End	CD	O,	Prossure		Humidity	Temp	oralura	Concentration		CO Moss Er	nissions	
Number	Time	Time	(ppmdv)	(Yedy)	Obs.	Ref.	(g H ₂ Olg elr)	(F).	(K)	(ppmdy @ 15% O ₃)	(ID/MMBID) 1	(MMBhuhr)	(apyla)	(lb/hr. po
U3-OIL-RUN1	.14:37	15:37	0.18	12.27	787.9	781.7	0.0159	86.0	303.2	0.12	0.0003	1749.7	0.51	0.58
U3-OIL-RUN2	15.48	16:46	0.20	12.23	787.9	781.7	0.0157		303.7	0.14	0.0003	1801.8	0.58	0.84
U3-OIL-RUN3	18:58	17:58	0.44	12.24	787.9	781.7	0.0153	85.0	302.6	0.30	0.0007	1848.4	1.31	1:44.
Average:			0.27	12.25						0.19:	0.0094	1800.0	0.80	.0.88
							Visible Emi	sions						
Run Number Start Timo			;	U3-M8-R4 14:37			U3-M9-R5 15:37			U3-M9-R6 18:37 17:37			Average	
Opadity (%)				15:37			16:37			17;37			.O.C	•

Colculated using convenient tectors (opm 🐋 lorson found in Application Francis at the factor (Fd. dry, carpen-based) of 87:10 dischMilitar in natural gas and \$790 dischMilitar in held all

Table 5 - Summary of NO_x, CO, and Visible Emissions at Vandolah Power Company: Unit 4 (May 22, 2003).

							NATURAL	GAS		•				
							NO _x Emiss	ions						
Run	Start	End	NOx	O ₁		stor Intet (mm Hg)	Ambieni Kumidily		bient erature	NOx Concentration	<u> </u>	NOx Mass E	endisala	
Number	Time	Time	(ppmdv)	(%dv)	Obs:	Ref.:	(g H ₂ O/g 89)	(F)	(K)	(ppmdv @ 15% O _t)	(ib/MMB(u)	(MMB(whr)	(lb/hr)	(ib/hr. ac
U4-GAS-RUN1	08:48	09:56	8.01	12.63	772.9	765.0	0.0154	.81.0	300.4	5.85	0.0215	1651.B	35:59	39,46
U4-GAS-RUN2	10.04	11:14	8.41	12,76	772,9	765 6	0.0184	87:0	303.7	6:09	0.0224	1647.4	38.97	42.67
U4GAS-RUN3	11:22	12:30	8.93	12.76	772.9	785.6	0.0196	90.0	305,4	6:47	0.0238	1648.9	39.25	45.96
Average			8.45	12.78						5,14	0.0226	1648.7	37.27	42.70
							CO Emiss	lons						
					Combu	stor Irdal	Ambient	. Am	blänt	CO	-		•	
Ruñ	Stert	End	CÓ	O,	Pressure	(aun Hg)	Humidity .	Temp	ershire	Concentration		CO Mass En	desions	
Number	Time	Time	(ppmdv)	(%dv)	Obs.	Rel.	(g H ₂ O/g air)	(F.)	(K):	(ppmdv @ 15% O ₂)	(Ib/MMBIu)	(MMBtufir)	(lb/hr)	(lb/hr, _{ss}
U4-GAS-RUN1	OB;48	09:58	0:34	12.83	772.9	785,6	0.0154	81.0	300.4:	0,25	0.0008	.1851,8	0.92	1:02
U4-GAS-RUN2	10:04	11:14	0.30	12.78	772.9	785.6	0.0184	87.0	303.7	0.21	D.0005.	1847.4	0.78	0.91
U4GAS-RUN3	11:22	12:30	0.25	12.76	772:9	765.6	0.0196	90.0	305.4	D:18	0,0004	1846.9	0.68	:0:77
Average:			0.29	12.78						0,21	0.0005	1648.7	0.78	0.90
							Visible Emis	slons						
Run Number				U4 MB R1		•	U4-M9-R2			:U4:M9-R3				
Start Time				B:4B			9:48			10:48				
End Time				0:48			10:48			11:48			Average	;
Opacity (%)				0.0			0.0			0.0			0,0	

							FUEL O	<u>IL</u>						
3) - 11111 - 11111 - 111111 - 1111111							NO _x Emiss	ions						
Run	Start	End	NOx '	O,		(inm Hg)	Amblent Humidity	Temp	blant erature	NOx Concentration		NOx Mass E		
Number	Time	Time	(ppmdv)	(%dv)	Obs	Rel	(g H ₂ O/g eth)	, (F)	(K)	(ppmdv @ 15% O ₂)	(њимвы)		(lb/hr)	(16/hr, ₁₅₀
U4-OIL-RUN1	15:20	16:20	51.78	12.27	770.3	765.6	0.0202	86.0	308.7	35,39	0.1375	1500.0	220.07	256,77
U4-OIL-RUN2	18:28	17:28	51.45	12.40	770.3	765.6	0.0182	80.0	299.8	35.71	0.1388	1600.0	222.10	260.68
U4-OIL-RUN3	19:15	20:15	50.91	12,37	770.3	765.6	0.0169	82.0	300.9	35.21	0.1369	1600.0	219.00	249.54
Average			51.37	12.35	**	, , ,			·	35.44	0.1377	1600.0	220.39	255.73
		. ,					CO Emiss	lons			-			
Run	Start	End	CO	O,		tor Injet: (mm Hg)	Amblent Humblity		bient orature	CO Concentration		CO Milia Ei	nisions	
Number	Time	Time	(pomdy)	(%dv)	Obs.	Ref.	(g H ₂ O/g ab)	(F)	(19)	(ppmdv @ 15% O ₂)	(гь/ммеш) 1	(MMBhi/hr)	(lb/hr)	(lb/hr, _{no})
U4-OIL-RUN1	15:20	16:20	0.17	12.27	770.3	785.6	0.0202	96.0		0:12	0,0003	1600.0	0.44	0.51
U4-OIL-RUN2	16:28	17:28	0.24	12.40	770.3 770.3	785.6	0.0182	80.0	299.8	0.17	0.0004	1600.0	0.83 1.00	0.74
U4-OIL-RUN3	19:15	20:15	0.38	12.37	770.3	765.6	0.0169	62.0	300.9	D.26	.0.0006	1600.0	1.00	1.13
Average			0.26	12.35						0,18	0.0004	1600.0	D.69	0,80
				-			Visible Emis	slons						
Run Number				U4-MB-R4	,		U4-M9-R5			U4-M9-R6				•
Start Time				15:20			16:20			17:20				
End Time				16:20			17:20			19:52			Average	
Opedity (%)			*	0.0			0.0			√0.0			0.0	·

Coloulated using conversion factors (ppm => lahact) found in Appoints F, and a fuel factor (Fd: dry, oxygen-based) of 8710 deciMMBtu for natural gas, and 9190 deciMMBtu, for puel of

GASEOUS EMISSIONS AND VISIBLE EMISSIONS COMPLIANCE TEST

Performed At Vandolah Power Plant Unit 1 Stack, Unit 2 Stack, Unit 3 Stack and Unit 4 Stack Wauchula, Florida

Test Dates
June 7 through 10, 2004

Report No.
GE Energy Management Services, Inc. Report M22K0044B Rev. 1

Report Submittal Date August 6, 2004







Natural Gas

P	arameter	Unit 1	Unit 2	Ünit 3	Unit 4
CO	ppmvd	0.21	0.38	0.09	0.05
	at 15% O₂	0.18	0.31	0.08	0.04
1	lbs/mmBtu	0.0004	0.0007	0.0002	0.0001
	lbś/hr	0.65	1.14	0.28	0.16
NOx	ppmyd	7.92	7.17	8.23	8.82
	at 15% O ₂	6.56	5.99	6.96	7.31
	lbs/mmBtu	0.024	0.022	0.025	0.027
	lbs/hr	39.90	35.99	42.35	43,64
Ó	₂ , % (dry)	13.78	13.84	13.92	13.82
	VE	0.0	0.0	0.0	0.0

Fuel Oil

P	arameter.	Unit 1	Unit 2	Unit 3	Unit 4
СО	ppmvd	0.94	0.65	.0.64	0.72
·	at 15% O ₂	0.67	0.47	0.46	0.50
	lbs/mmBtu	0.0016	0.0011	0.0011	0.0012
	lbs/hr	2.97	2.10	2.13	2.31
NO _x	ppmvd	46.45	49.76	÷52.56	42.24
	at 15% O ₂	33.03	35.83	38.15	29.47
	lbs/mmBtu	0.128	0.139	0.148	0.114
	lbs/hr	243.28	266.26	287.44	219.91
0	2, % (dry)	12.60	12.71	12.77	12.44
	VE	3.1	1,7	2.8	1.7

Complete test results can be found in Section 6.0.

2004



GASEOUS EMISSIONS AND VISIBLE EMISSIONS COMPLIANCE TEST

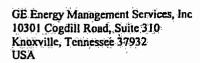
Performed At Vandolah Power Plant Unit 1 Stack, Unit 2 Stack, Unit 3 Stack and Unit 4 Stack Wauchula, Florida

Test Dates
June 6 through 9, 2005

Report No.

GE Energy Management Services, Inc. Report M22K0088B Rev. 1

Report Submittal Date
August 16, 2005







Natural Gas

ruiai Cai	<u> </u>				
P	arameter	Unit 1	Unit 2	Unit 3	Unit 4
CO	ppmyd	0.69	0.58	0.76	0.82
	at 15% O ₂	0.54	0.48	0.63	0.67
;	lbs/mmBtu	0.001	0.001	0.001	0.001
	lbs/hr	1.64	1.64	2.21	2.19
NOx	ppmvd	7.85	6.94	8.34	8.36
	at 15% O ₂	6.14	5.72	6.87	6.84
	lbs/mmBtu	0.022	0.021	0.025	0.025
	lbs/hr	36.66	34.40	42.03	41.63
Heat In	put, mmBtu/hr	1641.5	1638.5	1658.7	1643.0
 o	₂ , % (dry)	13.36	13.75	13.74	13.68

Fuel Oil

ê E	arameter.	Unit 1	Unit 2	Unit 3	Unit 4
CO	ppmvd	0.79	0.92	0.86	0.99
	at 15% O ₂	0.56	0.66	0.61	0.69
	lbs/mmBtu	0.001	0.002	0.001	0.002
	lbs/hr	2.28	2:84	2.30	3.38
NOx	pprnvd	51.64	50.21	51.17	48.38
	at 15% O ₂	36.73	36,24	36.42	33.92
	lbs/mmBtu	0.143	0.141	0.141	0.132
	lbs/hr	244.03	239.52	243.43	222.33
-0) ₂ , % (dry)	12.60	12.72	12.61	12.48
Heat In	put, mmBtu/hr	171.05	1702.8	1722.3	1688.7
	VE	0.6	0.5	0.4	0.4

Complete test results can be found in Section 6.0.

Michael O. White Project Manager



GASEOUS EMISSIONS AND VISIBLE EMISSIONS COMPLIANCE TEST

Performed At Vandolah Power Plant Unit 1 Stack, Unit 2 Stack, Unit 3 Stack and Unit 4 Stack Wauchula, Florida

Test Dates
June 5 through 9, 2006

Report No.
GE Energy Management Services, Inc. Report M22M0289B

Report Submittal Date
July 18, 2006

GE Energy Management Services, Inc 1001 Aviation Parkway Morrisville, North Carolina 27560 USA





Natural Gara

Pa	rameter	Allowable	Unit 1	Unit 2	Unit 3	Unit 4
CO.	ppmvd	<u> </u>	0.17	0.32	0.32	1.76
	at 15% O ₂	12	0.13	0.26	0.26	1.41
	lbs/mmBtu	`-	0.0003	0:0006	0.0006	0.0032
	lbs/hr	42.5	0.50	0.96	0.96	5.3
NOx	ppmvd	9	7.8	6.7	7,5	7,8
	at 15% O ₂	9	6.1	5.5	6.1	6.2
	lbs/mmBtu	:-	0.023	0.020	0.022	0.023
	lbs/hr -iso	64.1	37.6	33.2	36.8	38.6
Heat Inc	out, mmBtu/hr	_	1656.7	1663.0	1671.3	1678.9
O ₂	, % (dry)		13.4	13.7	13.6	13.5

Fuel Oil

Pa	rameter	Allowable	Unit 1	Unit 2	Unit 3	Unit 4
CO	ppmvd		0.83	0.61	0.51	0.47
	at 15% O ₂	20	0,57	0.43	0.36	0.33
	lbs/mmBtu	_	0.001	0.001	,0.001 7	0.001
	lbs/hr	71.4	1.75	1.74	1,71	1.75
NOx	ppmvd	÷.	48.5	46:8	47.1	49.0
	at 15% O₂	42	33.7	33.0	32.9	34.2
	lbs/mmBtu	-	0.131	0:128	0.128	0.133
-5	lbs/hr	351	228.7	222.8	218.9	233.1
Heat Inp	out, mmBtu/hr		1746,1	1736.2	1714.8	1752.6
O ₂ , % (dry)		·—.	12.4	12.5	12.5	12.5
Opacity, %		10.	0:	.0.	0.	0

Complete test results can be found in Section 6.0.

Michael O. White Project Manager



ISO 9001 Accredited Quality System

GASEOUS EMISSIONS AND VISIBLE EMISSIONS COMPLIANCE TEST

Performed At
Vandolah Power Plant
Unit 1 Stack, Unit 2 Stack, Unit 3 Stack and Unit 4 Stack
Wauchula, Florida

Test Dates
June 4 through 7, 2007

Report No.
GE Energy Management Services, Inc. Report M22M0366B

Report Submittal Date
July 12, 2007



Natural Gas

Pa	rameter	Allowable	Unit 1	Unit 2	Unit 3	Unit 4
CO	ppmvd	, .	0.6	0.6	0.6	0.7
	at 15% O ₂	12	0.5	.0.5	0.5	0.5
	lbs/mmBtu	-	0.001	0.001	0.0011	0.0012
	lbs/hr	42.5	1.7	1.6	1.8	2.0
NO _x	ppmvd	<u>. </u>	8.8	9.7	9.1	8.4
	at 15% O ₂	9	7.1	7.9	7.4	6.7
	lbs/mmBtu		0.026	0.029	0.0273	0.0243
	lbs/hr -iso	64.1	44.3	48.1	45.2	40.3
Heat Inp	out, mmBtu/hr		1704.8	1640.0	1654.2	1656.8
O ₂	, % (dry)		13.6	13.6	13.7	13.5

Fuel Oil

Pa	rameter	Allowable	Unit 1	Unit 2	Unit 3	Unit 4
CO	ppmvd	-	0.9	1.0	0.9	0.5
	at 15% O₂	20	0.6	0.7	0.6	0.3
	lbs/mmBtu		0.0015	0.002	0.0014	0.0008
	lbs/hr	71.4	2.6	3.4	2.3	1.4
NO _x	ppmvd		54.6	50.5	55.0	43.6
	at 15% O ₂	42	39.1	35.9	39.2	30.1
	lbs/mmBtu	÷.	0.152	0.139	0.153	0.117
	lbs/hr	351	259.7	237.3	252.4	203.2
Heat Inp	out, mmBtu/hr		1705.0	1703.4	1653.2	1736.8
02	, % (dry)	, - -,	12.7	12.6	12,6	12.4
Op	acity, %	10	0	0	0	O_

Complete test results can be found in Section 6.0.

ATTACHMENT B

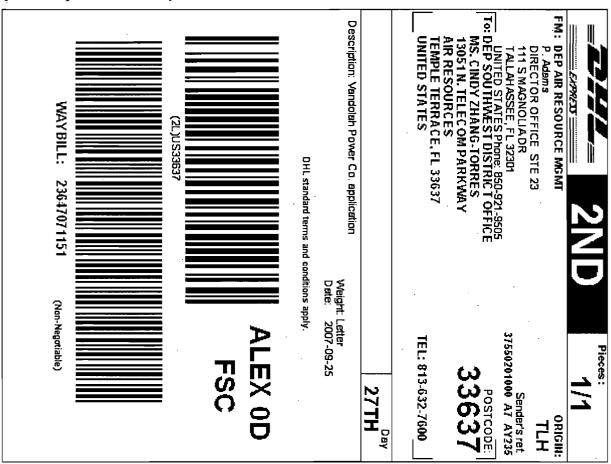
ATTACHMENT B

VANDOLAH RUN HOURS ON DIESEL FUEL AND PIPELINE NATURAL GAS

Year	Vandolah Unit 1 Hours on Oil	Vandolah Unit 2 Hours on Oil	Vandolah Unit 3 Hours on Oil	Vandolah Unit 4 Hours on Oil
2002	113	101	98	117
2003	106	89	58	89
2004	84	80	72	44
2005	102	148	81	143
2006	10	16	6	14
2007 Jan 1- Sept 9	5	24	22	5
TOTALS	420	458	337	412

Year	Vandolah Unit 1 Hours on Gas	Vandolah Unit 2 Hours on Gas	Vandolah Unit 3 Hours on Gas	Vandolah Unit 4 Hours on Gas
2002	204	234	193	182
2003	333	355	223	290
2004	239	214	161	126
2005	539	397	305	213
2006	453	193	163	124
2007 Jan 1- Sept 9	470	250	213	197
TOTALS	2238	1643	1258	1132

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Using a photocopy could	— — Please fold or cut in half — DO NOT PHOTOCOPY delay the delivery of your package and will result in	n additional shipping charge
SENDER'S RECEIPT Waybill #: 23647071151 To(Company): DEP Southwest District Office	Rete Estimete: Protection: Description:	3.58 Not Required Vandolah Power Co. application
Air Resources 13051 N. Telecom Perkway Temple Terrace, FL 33637 UNITED STATES Attention To: Ms. Cindy Zhang Phone#: 813-632-7600 Sent By: P. Adams Phone#: 850-921-9505	Special Svc: Date Printed:	5 PM) 9/25/2007
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