



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 07 2001

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Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Dear Mr. Linero:

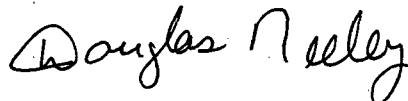
Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for the Blue Heron Energy Center dated February 6, 2001. The draft PSD permit is for the proposed construction and operation of four combined cycle combustion turbines (CTs) and four natural gas-fired heat recovery steam generating (HRSG) units with a total nominal generating capacity of 1080 megawatts (MW). The combustion turbines proposed for the facility are Siemens Westinghouse 501FD units. The CTs and HRSG duct burners will combust pipeline quality natural gas only. Total emissions from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), sulfur dioxide (SO₂) and particulate matter (PM/PM₁₀).

Based on our review of the preliminary determination and draft PSD permit, we have the following comments:

1. In Section III, condition 25 of the draft PSD permit, excess emissions during startup and shutdown are allowed for up to 4 hours in any 24-hour period. Because periods of startup and shutdown are part of normal source operation, we recommend that FDEP also consider establishment of startup and shutdown best available control technology (BACT) emission limits for CO and NO_x such as mass emission limits (for example, pounds of emissions in any 24-hour period) that include startup and shutdown emissions, or future emission limits derived from monitoring results during the first few months of commercial operation. At a minimum, FDEP should include definitions of the terms startup and shutdown based on observable conditions as referenced in condition 25.
2. An interest rate of 10 percent may be appropriate for the Blue Heron Energy Center BACT cost evaluation; however, it should be noted that the current version of the U.S. Environmental Protection Agency's (EPA's) *OAQPS Control Cost Manual* uses an interest rate of 7 percent. If there is justification for Blue Heron Energy Center to use a higher interest rate, documentation should be provided.

Thank you for the opportunity to comment on the preliminary determination and draft PSD permit for Calpine's Blue Heron Energy Center. If you have any questions or concerns, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,



R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: M. Malpin
C. Holladay
J. Conner, ECT
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