



Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief
Bureau of Air Regulation

THROUGH: Al Linero, Manager 
New Source Review Section

FROM: Jeff Koerner, New Source Review Section 

DATE: October 28, 2003

SUBJECT: Draft Air Permit No. 1010071-002-AC
Pasco Cogeneration, Limited
Combined Cycle Units 1 and 2, SPRINT Project

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft permit authorizes the installation of "SPRINT" spray inter-cooling technology on the two existing LM-6000 gas turbines (Emissions Units 001 and 002). The two gas turbines form a 2-on-1 combined unit capable of producing approximately 80 MW of direct generation and 26.5 MW from steam. The new equipment will be installed at the existing Pasco Cogeneration Plant, which is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33525. The addition of SPRINT is expected to result in only slight increases in CO and NOx emissions and the project does not trigger PSD preconstruction review. The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The PE certification briefly summarizes the proposed project. Day #74 is January 3, 2004. I recommend your approval of the attached Draft Permit for this project.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

Pasco Cogeneration, Limited
20 West 9th Street
Kansas City, MO 64105

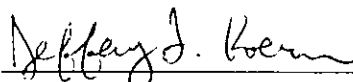
Draft Air Permit No. 1010071-002-AC
Combined Cycle Units 1 and 2
SPRINT Project
Pasco County, Florida

PROJECT DESCRIPTION

The applicant proposes to add SPRINT technology to the two existing gas turbines to enhance performance. "SPRINT" stands for *SPRAY* *INTER*-cooling, which involves the injection of atomized water into the compressor between the high-pressure and low-pressure compressors. This results in evaporative cooling of the compressor inlet air and higher mass flow rates. Benefits include increased power output with more efficient fuel usage. The maximum heat input rate when firing natural gas is expected to increase from 423 to 427 MMBtu per hour. The power output is expected to increase from 39.5 to 50.2 MW depending on ambient conditions.

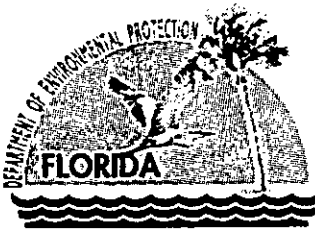
As an electric utility steam generating unit, Pasco Cogeneration Ltd. projects that the addition of SPRINT will have little impact with regard to actual emissions from these units. In other words, future representative actual emissions due to the addition of SPRINT technology would be less than the 2-year average actual annual emissions discounting any emissions due to demand growth that could have been accommodated prior to the change. The draft permit authorizes the SPRINT project and specifies emissions standards for carbon monoxide and nitrogen oxides. Initial and annual testing is required for these pollutants. The permittee is required to submit reports comparing actual emissions after implementing SPRINT to the past actual emissions (2-year average) before the project. If the comparison shows an increase in actual emissions greater than the PSD significant emission rates defined in Table 212.400-2, F.A.C., then Units 1 and 2 shall be subject to PSD preconstruction review at that time. The review shall include a determination of the Best Available Control Technology (BACT) for each PSD-significant pollutant.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number: 49441

10-28-03
(Date)



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

November 5, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Pasco Cogeneration, Limited
20 West 9th Street
Kansas City, MO 64105

Authorized Representative:

Mr. Leo Rajter, Vice President

Re: Draft Air Permit No. 1010071-002-AC
Pasco Cogeneration, Limited
SPRINT Project

Dear Mr. Rajter:

Enclosed is one copy of the draft permit to install "SPRINT" spray inter-cooling technology on the two existing LM-6000 gas turbines (Emissions Units 001 and 002). The new equipment will be installed at the Pasco Cogeneration Plant, which is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33525. The Department's "Technical Evaluation and Preliminary Determination", "Intent to Issue Permit", and the "Public Notice of Intent to Issue Permit" are also included.

The "Public Notice of Intent to Issue Permit" must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, Administrator of the New Source Review Section, at the above letterhead address. If you have any other questions, please contact Jeff Koerner at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Air Permit by:

Pasco Cogeneration, Limited
20 West 9th Street
Kansas City, MO 64105

Authorized Representative:

Mr. Leo Rajter, Vice President

Draft Air Permit No. 1010071-002-AC
Units 1 and 2, SPRINT Project
Pasco County, Florida

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of Draft Permit attached) for the proposed project as detailed in the application and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below. The applicant, Pasco Cogeneration, Limited, applied on June 10, 2003 to the Department for a permit to install "SPRINT" spray inter-cooling technology on the two existing LM-6000 gas turbines (Emissions Units 001 and 002). The new equipment will be installed at the Pasco Cogeneration Plant, which is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33525.

The Department has permitting jurisdiction under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210, and 62-212, F.A.C. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform the proposed work. The Department intends to issue this air construction permit based on the belief that the applicant has provided reasonable assurances to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) and (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S. however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of

receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

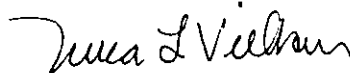
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Mediation is not available in this proceeding. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Permit package (including the Public Notice of Intent to Issue Permit, Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 11/6/03 to the persons listed:

Mr. Leo Rajter, Pasco*
Mr. Richard Christmas, Pasco
Mr. Tom Grace, Pasco c/o Aquila
Mr. John L. McKelvey, Case Engineering, Inc.
Mr. Gerald Kissel, SWD Office
Mr. Gregg Worley, EPA Region 4 Office
Mr. John Bunyak, NPS

Clerk Stamp

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

Victoria Gibson / November 6, 2003
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft Air Permit No. 1010071-002-AC

Pasco Cogeneration, Limited
SPRINT Project

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Pasco Cogeneration, Limited (Applicant) to install "SPRINT" spray inter-cooling technology on the two existing LM-6000 gas turbines (Emissions Units 001 and 002). The new equipment will be installed at the Pasco Cogeneration Plant, which is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33525. The applicant's authorized representative and mailing address is: Mr. Leo Rajter, Vice President, Pasco Cogeneration, Limited, 20 West 9th Street, Kansas City, MO 64105.

The applicant proposes to add SPRINT technology to the two existing gas turbines to enhance performance. "SPRINT" stands for *SP*Ray *INT*er-cooling and involves the injection of atomized water into the compressor between the high-pressure and low-pressure compressors. This results in evaporative cooling of the compressor inlet air and higher mass flow rates. Benefits include increased power output with more efficient fuel usage. The maximum heat input rate when firing natural gas is expected to increase from 423 to 427 MMBtu per hour. The power output is expected to increase from 39.5 to 50.2 MW depending on ambient conditions.

As an electric utility steam generating unit, Pasco Cogeneration Ltd. projects that the addition of SPRINT will have little impact with regard to actual emissions from these units. In other words, future representative actual emissions due to the addition of SPRINT technology would be less than the 2-year average actual annual emissions discounting any emissions due to demand growth that could have been accommodated prior to the change. The draft permit authorizes the SPRINT project and specifies emissions standards for carbon monoxide and nitrogen oxides. Initial and annual testing is required for these pollutants. The permittee is required to submit reports comparing actual emissions after implementing SPRINT to the past actual emissions (2-year average) before the project. If the comparison shows an increase in actual emissions greater than the PSD significant emission rates defined in Table 212.400-2, F.A.C., then Units 1 and 2 shall be subject to PSD preconstruction review at that time. The review shall include a determination of the Best Available Control Technology (BACT) for each PSD-significant pollutant.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Florida Department of Environmental Protection
Bureau of Air Regulation, New Source Review Section
(111 S. Magnolia Drive, Suite 4)
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400
Telephone: 850/488-0114

Florida Department of Environmental Protection
Air Resources Section
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100

The complete project file includes the application, Technical Evaluation and Preliminary Determination, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Bureau of Air Regulation's review engineer for this project for additional information at the address and phone number listed above.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Air Permit No. 1010071-002-AC
Addition of SPRINT Inter-Cooling to Existing 2-on-1 Combined Cycle Gas Turbine Unit
(Emissions Units 001 and 002)

COUNTY

Pasco County, Florida

APPLICANT

Pasco Cogeneration, Limited
ARMS Facility ID No. 1010071

**PERMITTING
AUTHORITY**

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section



October 28, 2003

{Filename: 1010071-002-AC - TEPD}

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

Pasco Cogeneration, Limited
20 West 9th Street
Kansas City, MO 64105

Authorized Representative:

Mr. Leo Rajter, Vice President

Processing Schedule

06/10/03 Received the application for a minor source air pollution construction permit to avoid PSD review.
06/20/03 Department requested additional information.
09/17/03 Department received additional information.
10/07/03 Department requested additional information.
10/22/03 Department received additional information; application complete.

Facility Description and Location

The existing facility primarily consists of two 42 MW combined cycle gas turbines (EU-001 and EU-002) configured with chiller systems to maintain the inlet compressor air at 51° F and 100% relative humidity. Each combined cycle unit incorporates a 90 MMBtu per hour, gas-fired duct burner system in the heat recovery steam generator (HRSG). Each HRSG directs steam to a common steam turbine-electrical generator set, which produces another 26.5 MW of electricity. Alternatively, steam may be delivered to an adjacent citrus processing plant. The gas turbines primarily fire natural gas, but can also fire No. 2 distillate oil as a restricted alternate emergency backup fuel. Other sources of air pollution include a 170,000 gallon oil storage tank (EU-003), two 1274 kW diesel emergency generators (EU-004), and fugitive emissions (EU-005).¹

The existing facility is located in Pasco County at 14850 Old State Road 23, Dade City, Florida. The UTM Coordinates are Zone 17, 383.5 km East and 3139.0 km North.

SIC No. 4931 – Electric and other services combined (cogeneration)

Regulatory Categories

Title III: Based on the application, the existing facility is not a major source of hazardous air pollutants (HAP).

Title IV: Based on the application, the existing facility has no units subject to the acid rain provisions.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

Project Description

Initial Permit No. PSD-FL-177 to construct the 2-on-1 combined cycle gas turbine system was issued on November 20, 1991. The gas turbines began operation in 1995. The applicant proposes to add SPRINT technology to the two existing gas turbines to enhance performance. "SPRINT" stands for *SP*Ray *INT*ercooling, which involves the injection of atomized water into the compressor between the high-pressure and low-pressure compressors. This results in evaporative cooling of the compressor inlet air and higher mass flow rates. Benefits include increased power output with more efficient fuel usage. The maximum heat input rate when firing natural gas is expected to increase from 423 to 427 MMBtu per hour. The power output is expected to increase from 39.5 to 50.2 MW depending on ambient conditions.² The applicant initially provided the

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

following PSD applicability analysis with regard to CO and NOx emissions.

Table 1A. Applicant's Initial CO and NOx PSD Applicability Analysis

Pollutant	2-Year Avg. TPY	Proposed Cap TPY	Difference TPY	PSD SER TPY	Subject to PSD?
Carbon Monoxide (CO)	237.6	337.0	99.4	100	No
Nitrogen Oxides (NOx)	328.4	368.0	39.6	40	No

The 2-year average shown in the table is based on 1998 and 1999 operation data. During these years, the gas turbines averaged about 7850 hours per year of operation. The applicant initially proposed CO and NOx emission caps just below the PSD significant emissions rates to avoid PSD preconstruction review for the project.² However, the applicant later changed this request. As an electric utility steam generating unit, the applicant does not believe the proposed project will result in actual increased annual emissions discounting any emissions that can be attributed to demand growth. As such, the applicant requests a permit to authorize the construction and reporting requirements to demonstrate that the proposed project did not result in PSD-significant emissions increases.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Required Permits, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Requirements, and BACT Determinations
62-213	Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

Federal Regulations

This project is also subject to the applicable federal provisions regarding air quality as established by the EPA in the following sections of the Code of Federal Regulations (CFR).

<u>Title 40, CFR</u>	<u>Description</u>
Part 60	Subpart A - General Provisions for NSPS Sources
	NSPS Subpart Dc - Small Industrial-Commercial-Institutional Steam Generating Units
	NSPS Subpart GG - Gas Turbines
	Applicable Appendices

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required only in areas currently in attainment with the National

Ambient Air Quality Standard (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.), or
- 5 tons per year of lead.

For new projects at existing PSD-major sources, actual pollutant emissions increases are reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Increases in actual pollutant emissions resulting from the project that exceed these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

The existing plant site is located in Pasco County, which is an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standard (AAQS). Actual and potential emissions of carbon monoxide (CO) and nitrogen oxides (NO_x) are greater than 250 tons per year. Therefore, the existing plant is a PSD-major facility in accordance with Rule 62-212.400, F.A.C. Therefore, new projects must undergo a review for PSD applicability.

3. DEPARTMENT'S REVIEW

Description of SPRINT Technology

As previously mentioned, "SPRINT" is an acronym for *SP*Ray *IN*ter-cooling, which can provide up to 20% more power output for the given ambient conditions. An automated control system meters approximately 6-7 gpm of de-mineralized water to a series of 24 spray nozzles. The water is atomized into droplets that are less than 20 μ m in diameter, which are then injected between the high-pressure and low-pressure compressors. The LM6000 is a high-pressure ratio gas turbine design, which carefully controls the compressor discharge temperature because the compressed air is used to cool the hot section components. Injecting atomized water just before the high-pressure compressor significantly reduces the temperature, which increases the mass flow rate and provides a greater compression ratio. The result is higher output and improved efficiency. The following figure is a half section view of the LM6000 SPRINT gas turbine, which shows the location of the spray nozzles between the low pressure and high pressure compressors.^{3, 4, 5}

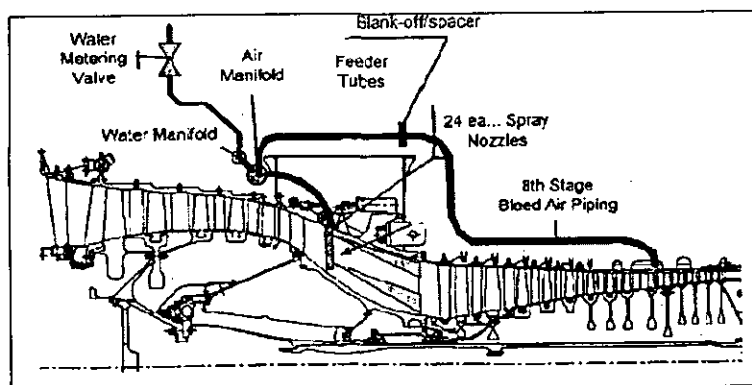


Figure 3-1. Half Section View of LM6000 Gas Turbine Compressor Section³

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The benefits of SPRINT are more pronounced at high ambient temperatures. At ISO conditions (59° F), SPRINT can provide an additional 9% more power. However, at an ambient temperature of 90° F, SPRINT can provide 20% more power. The following figure schematically shows the impacts of SPRINT inter-cooling.

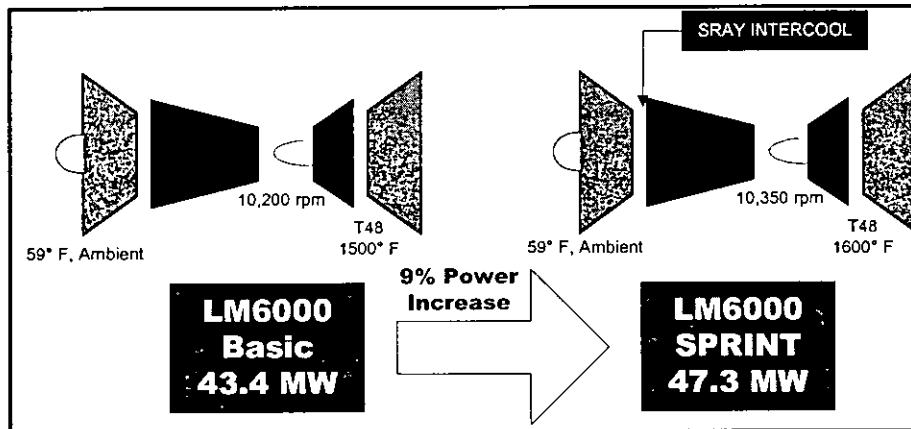


Figure 3-2. Schematic of SPRINT Inter-Cooling Technology⁴

SPRINT technology can be incorporated into new units or be retrofitted to either existing LM6000 PC model (conventional combustors) or the LM6000PD (dry low emissions combustors) model gas turbines systems. The Pasco Cogeneration gas turbines use the more conventional combustors with water injection to reduce NOx emissions. For the LM6000 gas turbine, SPRINT can improve the maximum output to nearly 55 MW with a thermal efficiency of 52%. In previous retrofit applications, SPRINT allowed some plants to shut off, or greatly reduce, usage of existing chiller systems to save associated operating and maintenance costs.

Hourly Emission Rates

The following table shows the maximum expected hourly emission rates before and after the addition of SPRINT.²

Table 3A. Comparison of Short Term Emission Rates

Pollutant	Current, lb/hr		Proposed, lb/hr		SPRINT Difference, lb/hr	
	Gas Only	Gas w/DB	Gas Only	Gas w/DB	Gas Only	Gas w/DB
Carbon Monoxide (CO)	56.0	92.0	56.5	92.5	0.5	0.5
Nitrogen Oxides (NOx)	85.5	103.5	86.0	104.0	0.5	0.5
Particulate Matter (PM/PM10)	5.0	7.6	5.0	7.6	Neg.	Neg.
Sulfuric Acid Mist (SAM)	0.2	0.3	0.2	0.3	Neg.	Neg.
Sulfur Dioxide (SO2)	4.6	5.6	4.6	5.6	Neg.	Neg.
Volatile Organic Compounds (VOC)	3.4	8.8	3.4	8.8	Neg.	Neg.

Notes:

- Consistent with the current permits, hourly emissions are the total for both gas turbine units.
- Maximum hourly emission rates are from the current Title V permit and the proposed application.
- SO₂ emissions from gas firing were estimated based on the maximum heat input rates and a conservative assumption for fuel sulfur of 2 grains of sulfur per 100 scf of natural gas.
- Similar to oil firing calculations, SAM emissions were assumed to be 4% of the SO₂ emissions.

The following table summarizes CO and NOx emissions test data as compiled from the Department's ARMS database.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Table 3B. Actual Hourly CO and NOx Emissions, Firing Natural Gas

Test Date ¹	Unit 1		Unit 2	
	CO ppmvd	NOx ppmvd @ 15% O ₂	CO ppmvd	NOx ppmvd @ 15% O ₂
09/1996	---	23.5 21.32 w/DB	---	23.4 22.5 w/DB
09/1997	23.6 19.1 w/DB	20.9 18.0 w/DB	16.0 13.4 w/DB	23.1 18.5 w/DB
07/1998	---	24.1	---	24.6
03/1999	21.3	24.9	---	---
08/1999	---	25.0	---	24.9
07/2000	---	25.0	---	24.5
07/2001	---	---	---	24.6
08/2001	---	23.7	---	---
08/2002	---	23.4	---	23.8
07/2003	---	---	---	24.3
08/2003	---	24.5	---	---

Notes:

- Based on information in the Department's ARMS database.
- Tests conducted in September of 1995 were reported in terms of "lb/hour". The Department did not have enough information to estimate emissions in terms of "ppmvd".

In general, the test data shows that actual CO and NOx emissions are maintained below the emissions standards of 28 and 25 ppmvd, respectively. It is interesting to note that both the CO and NOx concentrations when duct firing were lower than without duct firing.

Annual Emission Rates

As shown in the table for hourly emission rates, the project is expected to have a negligible impact with regard to emissions of PM/PM₁₀, SAM, SO₂, and VOC. Therefore, the potential annual emissions increases from both gas turbines will remain less than the PSD significant emission rates for these pollutants. In addition, the gas turbines have fired little oil. Based on past Annual Operating Reports, the maximum oil firing occurred in 1998 when Unit 1 fired oil for approximately 7 hours (19,690 gallons) and Unit 2 for approximately 17 hours (48,380 gallons). According to the plant engineer, oil is only occasionally fired to prove to the steam host that it is reliable as a backup fuel.⁶ Therefore, this review does not consider oil firing because oil firing is restricted to emergency backup operation (≤ 240 hours per year) and the project will not change any conditions related to oil firing. The remainder of this review will focus on emissions of carbon monoxide (CO) and nitrogen oxides (NOx) from gas firing. The following table shows the future potential emissions with SPRINT compared to the two-year annual average emissions from the two gas turbines combined.

Table 3C. Comparison of Past Actual to Future Potential Annual Emissions

Pollutant	2-Year Avg. TPY	Future Potential TPY	Difference TPY	PSD SER TPY	Subject to PSD?
Carbon Monoxide (CO)	237.6	344.8	107.2	100	Potentially
Nitrogen Oxides (NOx)	328.4	406.9	78.5	40	Potentially

Notes:

- a. The 2-year average actual emission rate is based on the Annual Operating Reports for 1998 and 1999 and includes gas combustion in the duct burner system.
- b. Future potential emissions are based on the maximum expected hourly emissions from firing only natural gas and an average turbine inlet temperature of 59° F.
- c. Maximum annual emissions are based on 8760 hours per year of gas firing, of which 5833 hours include duct burning. Originally, each HRSG duct burner was specified at 150 MMBtu per hour and limited to 525,000 MMBtu per year, which is equivalent to 3500 hours per year of full load operation. Each installed HRSG duct burner is actually 90 MMBtu per hour, which results in about 5833 hours of operation per year based on the annual gas firing limitation.

The above table shows that a direct comparison of the past actual to future potential annual emissions could trigger PSD applicability. For this reason, the applicant initially requested a CO cap of 337 tons per year and a NOx cap of 368 tons per year, which result in net emissions increases just below the PSD significant emission rates. However, in accordance with Rule 62-210.200(97), F.A.C., the existing combined cycle unit is considered *electric utility steam generating unit*, which is defined as:

“Any steam electric generating unit that is constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW electrical output to any utility power distribution system for sale. Any steam supplied to a steam distribution system for the purpose of providing steam to a steam-electric generator that would produce electrical energy for sale is also considered in determining the electrical energy output capacity of the unit.”

As previously mentioned, the rated capacity of the steam turbine electrical generator in the existing 2-on-1 combined cycle unit is 26.5 MW. In addition, steam that is supplied to the steam host represents only a small fraction of the potential capacity. Therefore, the existing 2-on-1 combined cycle system is considered an electric utility steam generating unit. Rule 62-212.200(11)(d), F.A.C. defines *actual emissions* for these units as:

“For an electric utility steam generating unit (other than a new unit or the replacement of an existing unit) actual emissions of the unit following a physical or operational change shall equal the representative actual annual emissions of the unit following the physical or operational change, provided the owner or operator maintains and submits to the Department on an annual basis, for a period of 5 years representative of normal post-change operations of the unit, within the period not longer than 10 years following the change, information demonstrating that the physical or operational change did not result in an emissions increase. The definition of “representative actual annual emissions” found in 40 CFR 52.21(b)(33) is adopted and incorporated by reference in Rule 62-204.800, F.A.C.”

40 CFR 52.21(b)(33) defines *representative actual annual emissions* as:

“Representative actual annual emissions means the average rate, in tons per year, at which the source is projected to emit a pollutant for the two-year period after a physical change or change in the method of operation of a unit, (or a different consecutive two-year period within 10 years after that change, where the Administrator determines that such period is more representative of normal source operations), considering the effect any such change will have on increasing or decreasing the hourly emissions rate and on projected capacity utilization. In projecting future emissions the Administrator shall:

- (i) Consider all relevant information, including but not limited to, historical operational data, the company's own representations, filings with the State or Federal regulatory authorities, and compliance plans under title IV of the Clean Air Act; and
- (ii) Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit's emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

the particular change, including any increased utilization due to the rate of electricity demand growth for the utility system as a whole.”

As an electric utility steam generating unit, Pasco Cogeneration Ltd. projects that the addition of SPRINT will have little impact with regard to actual emissions from these units. In other words, future representative actual emissions due to the addition of SPRINT technology would be less than the 2-year average actual annual emissions discounting any emissions due to demand growth that could have been accommodated prior to the change. The applicant agrees to submit the required reports for a period of 5 years demonstrating that the SPRINT project did not result in a net actual annual emissions increase.

Conclusion

Based on conversations with the applicant⁶, current operating practices for the plant include the following:

- Both units operate near capacity during the day;
- One unit shuts down at night and one unit continues to operate as necessary;
- Units are cycled each day for the nighttime shutdown to maintain equivalent hours on each unit;
- Duct burners are used for on-peak demand;
- Chiller system is used for on-peak demand, mostly during the summer; and
- Units only fire distillate oil as a restricted emergency backup fuel (< 240 hours per year).

Although the addition of SPRINT is a substantial investment (~ \$7 million for both units combined), it will not change the current operating practices at the plant. SPRINT will be used nearly all of the time, which is expected to decrease operation of the chiller system and duct firing in order to save on operational expenses. SPRINT will also be used when firing oil, but will have a negligible impact with regard to emissions for the 240 hours per year allowed for oil firing. For comparison purposes, the following table shows the maximum annual emissions increases due *solely* to the addition of SPRINT technology when firing natural gas and neglecting emissions from other operating conditions.

Table 3C. Potential Annual Emissions Increases Due Solely to the Addition of SPRINT

Pollutant	Gas Only TPY	Gas w/DB TPY	Total TPY
Hours per Year	2927	5833	8760
Carbon Monoxide (CO)	0.7	1.5	2.2
Nitrogen Oxides (NOx)	0.7	1.5	2.2

Notes:

- Potential annual emissions are the total for both units firing natural gas.
- Potential annual emissions are based on the difference between the current permitted maximum hourly emission rate and the proposed maximum hourly emissions rate with SPRINT.
- Maximum annual emissions are based on 8760 hours per year of gas firing, of which 5833 hours include duct burning.

As shown, the maximum expected impacts due only to SPRINT appear minimal. Although SPRINT allows operation at a higher generating capacity with slightly increased emissions, it will also tend to replace operation of the existing chiller and duct burner systems, which provide similar benefits. Therefore, it is unlikely that the SPRINT project will result in increased actual emissions.

4. PRELIMINARY DETERMINATION

The Department approves the applicant's request and will issue a draft permit to authorize the project with the following requirements:

- Authorization to install SPRINT inter-cooling technology on each unit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- Modification of the maximum hourly CO and NOx mass emission rates (lb/hour) when using SPRINT.
- Requirement for initial and annual CO and NOx emissions tests that will establish the actual emission rates from each modified unit.
- Identification of the 2-year average CO and NOx annual emissions.
- Submittal of reports for at least 5 years following the SPRINT project to demonstrate that the project did not result in PSD-significant net emissions increases.
- Requirement for PSD preconstruction review should the SPRINT project result in actual net emissions increases greater than the PSD significant emission rates.

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in significant net emissions increases. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

REFERENCES

1. Title V Air Operation Permit No. 1010071-001-AV for Pasco Cogeneration Ltd.
2. Application by Pasco Cogeneration Ltd. Requesting an Air Construction Permit to Add SPRINT Technology to the Two Existing Gas Turbines (Project No. 1010071-002-AC).
3. "LM6000 SPRINT in Service with British REC"; Article from the magazine *International Turbomachinery* dated September/October 1998
4. "LM6000 Now with SPRINT Power Boost"; Article from a 1999 Company Brochure by S&S Energy Products: A GE Power Systems Business
5. "Inter-cooling for LM6000 Gas Turbines" by Mark McNeely; Article from the 1998 July/August Edition of the magazine *Diesel and Gas Turbine Worldwide*
6. Phone conference between the Department (Jeff Koerner) and the applicant (Tom Grace and plant engineer); October 1, 2003

DRAFT PERMIT

PERMITTEE:

Pasco Cogeneration, Limited
20 West 9th Street
Kansas City, MO 64105

Authorized Representative:

Mr. Leo Rajter, Vice President

Pasco Cogeneration, Limited Air Permit No. 1010071-002-AC Facility ID No. 1010072 SIC No. 4931 Permit Expires: December 1, 2004

PROJECT AND LOCATION

This permit authorizes construction to add "SPRINT" spray inter-cooling technology to the two existing gas turbines (EU-001 and EU-002) Pasco Cogeneration Plant, which is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33525. The UTM coordinates are Zone 17, 383.5 km East, and 3139.0 km North.

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.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

Michael G. Cooke, Director
Division of Air Resources Management

(Effective Date)

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of the following emissions units:

ID	Emission Unit Description
001	Unit 1 - Combined cycle gas turbine with duct burner system
002	Unit 2 - Combined cycle gas turbine with duct burner system
003	Oil storage tank
004	Emergency diesel generators
005	Fugitive VOC emissions

REGULATORY CLASSIFICATION

Title III: Based on the application, the existing facility is not a major source of hazardous air pollutants (HAP).

Title IV: Based on the application, the existing facility has no units subject to the acid rain provisions.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: Applications for permits regarding PSD preconstruction review shall be submitted to the New Source Review Section of the Department's Bureau of Air Regulation at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Applications for permits regarding operation or minor sources shall be submitted to the Air Resources Section of the Department's Southwest District Office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's Southwest District Office at 3804 Coconut Palm Drive, Tampa, Florida 33619-8218.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); Appendix B (General Conditions); and Appendix C (Standard Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit Revision: Pursuant to Rule 62-213.420(1)(a)2, F.A.C., the permittee shall submit an application for a revised Title V air operation permit at least 90 days before the expiration of this permit, but no later than 180 days after commencing operation. In accordance with Rule 62-213.412(2), F.A.C., the permittee may immediately implement the changes authorized by this air construction permit after submitting the application for a revised Title V air operation permit to the Permitting Authority and providing copies of the application to EPA Region 4 and each Compliance Authority. To apply for a revised Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. As necessary, the application shall include a Compliance Assurance Monitoring Plan. The application shall be submitted to the Department's Southwest District Office at the address identified above. [Rules 62-4.030, 62-4.050, 62-4.220, 62-213.412, and 62-213.420, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

C. EU-001/002, Units 1 and 2 Combined Cycle Gas Turbines

This section of the permit addresses the following emissions unit.

Emissions Unit Nos. 001 and 002

Description: Each unit consists of a General Electric Model LM06000 gas turbine, heat recovery steam generator (HRSG) with duct firing, chiller system, and SPRINT spray inter-cooling. Steam generated in the HRSGs is directed to a common steam turbine-electrical generator, which is rated at 26.5 MW. Alternatively, steam can be directed to an independent steam host (an adjacent citrus processing facility).

Fuel: Each unit fires pipeline natural gas as the primary fuel and distillate oil as a restricted alternate fuel.

Capacity: At a turbine inlet temperature of 51° F, the maximum heat input rate from gas firing (LHV) without SPRINT is 423 MMBtu per hour, which produces approximately 42 MW. At a turbine inlet temperature of 51° F, the maximum heat input rate from gas firing (LHV) with SPRINT is 427 MMBtu per hour, which produces approximately 52 MW.

NOx Controls: A water injection system is used to reduce NOx emissions. The water-to-fuel ratio is monitored continuously and adjusted by the automatic control system based on load conditions.

Stack Parameters: The stack is a maximum of 11 feet in diameter and at least 100 feet tall. After the HRSGs and steam turbine-electrical generator, the exhaust exits at approximately 232° F with a volumetric flow rate of approximately 325,000 acfm.

{Permitting Note: The units remain subject to the applicable requirements of previous air construction Permit No. PSD-FL-177 (Project No. AC51-196460) and current Title V air operation Permit No. 1010071-001-V.}

PREVIOUS APPLICABLE REQUIREMENTS

1. **Other Permits:** The conditions of this permit supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of these permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. [Rule 62-4.070, F.A.C.]

EQUIPMENT AND PERFORMANCE RESTRICTIONS

2. **SPRINT Upgrade:** This permit authorizes the construction activities necessary to add General Electric's "SPRINT" spray inter-cooling technology. In general, the equipment consists of a system that will automatically meter approximately 6-7 gpm of de-mineralized water to a series of 24 spray nozzles. [Applicant Request]
3. **Permitted Capacity:** At a turbine inlet temperature of 51° F, the maximum heat input rate from firing natural gas (LHV) when utilizing the SPRINT system is 427 MMBtu per hour, which produces approximately 52 MW of direct power. [Rule 62-210.200(PTE), F.A.C.]

{Permitting Note: This permit does not alter any previous requirements for other methods of operation or modify any specifications related to authorized fuels, fuel consumption, or allowable hours of operation.}

EMISSIONS STANDARDS

4. Carbon Monoxide (CO)

- a. **Combustion Turbines (CTs):** When firing natural gas and utilizing SPRINT, CO emissions from each unit shall not exceed 28 ppmvd. In addition, the maximum CO mass emission rate from both units combined shall not exceed 56.5 pounds per hour based on a turbine inlet temperature of 51° F.

{Permitting Note: The concentration-based standard (ppmvd) remains consistent with the BACT determination made in Permit No. PSD-FL-177.}

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

C. EU-001/002, Units 1 and 2 Combined Cycle Gas Turbines

- b. **Combustion Turbines and Duct Burners (CTs+DBs):** When firing natural gas, operating the duct burner system, and utilizing SPRINT, the maximum CO mass emission rate from both units combined shall not exceed 92.5 pounds per hour based on a turbine inlet temperature of 51° F.

[Rule 62-4.070(3), F.A.C.; Design]

5. Nitrogen Oxides (NOx)

- c. **Combustion Turbines (CTs):** When firing natural gas and utilizing SPRINT, NOx emissions from each unit shall not exceed 25 ppmvd corrected to 15% oxygen. In addition, the maximum NOx mass emission rate from both units combined shall not exceed 86.0 pounds per hour based on a turbine inlet temperature of 51° F. *{Permitting Note: The concentration-based standard (ppmvd corrected to 15% oxygen) remains consistent with the initial BACT determination made in Permit No. PSD-FL-177.}*
- d. **Combustion Turbines and Duct Burners (CTs+DBs):** When firing natural gas, operating the duct burner system, and utilizing SPRINT, the maximum NOx mass emission rate from both units combined shall not exceed 104.0 pounds per hour based on a turbine inlet temperature of 51° F.

[Rule 62-4.070(3), F.A.C.; Design]

6. Other Emissions Standards: Unless otherwise specified above, the emissions standards specified in current Title V air operation Permit No.1010071-001-AV also apply when utilizing the SPRINT spray inter-cooling system with each corresponding operational configuration. [Rule 62-4.070(3), F.A.C.]

EMISSIONS PERFORMANCE TESTING

7. Initial Compliance Tests: Each unit shall be tested to demonstrate initial compliance with the CO and NOx emissions standards specified in this permit. CO and NOx emissions test shall be conducted concurrently. The initial tests shall be conducted within 60 days after completing construction of the SPRINT project and achieving maximum production capacity, but not later than 180 days after initial operation of the unit with SPRINT. [Rule 62-297.310(7)(a)1, F.A.C.]
8. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), each unit shall be tested to demonstrate compliance with the CO and NOx emissions standards specified in this permit. CO and NOx emissions test shall be conducted concurrently. [Rule and 62-297.310(7)(a)4, F.A.C. and to avoid Rule 62-212.400, F.A.C.]
9. Test Notifications: At least 15 days prior to the date on which each required test is to begin, the permittee shall notify the Compliance Authority of the date, time, and place of each test. The notification shall also include the name and phone number of the contact person who will be responsible for coordinating and having the tests conducted. [Rule 62-4.297.310(7)(a)9, F.A.C.]
10. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content.
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources.
10	Determination of Carbon Monoxide Emissions from Stationary Sources. <i>{Permitting Note: The method shall be based on a continuous sampling train.}</i>
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates. <i>{Permitting Note: The F-factor method may also be used to determine flow rates and gas analysis to calculate mass emission rates in lieu of Methods 1-4.}</i>

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

C. EU-001/002, Units 1 and 2 Combined Cycle Gas Turbines

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. Tests shall also be conducted in accordance with the requirements specified in Appendix C of this permit. No other methods may be used without prior written approval from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

NOTIFICATIONS, RECORDS AND REPORTS

11. Construction Notifications: Within 15 days of beginning construction, the permittee shall notify the Compliance Authority that construction has commenced. Within 15 days of completing construction, the permittee shall notify the Compliance Authority that construction has concluded. Each notification shall include an updated proposed schedule of activities through the initial shakedown period and initial testing. [Rule 62-4.070(3), F.A.C.]
12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix C of this permit. For each test run, the report shall also indicate the operating load (MW), maximum heat input rate (MMBtu per hour), ambient temperature (° F), turbine inlet temperature (° F), and water-to-fuel ratio. [Rule 62-297.310(8), F.A.C.]
13. Operational Data: The permittee shall monitor and record the hours of operation utilizing SPRINT. [Rule 62-4.070(3), F.A.C.]
14. PSD Applicability Report: Before March 1st of each year, the permittee shall submit a report to the Bureau of Air Regulation and the Compliance Authority summarizing actual annual emissions for the previous calendar year. The reports shall be submitted for five separate years that are representative of normal post-change operations after completing construction of the SPRINT project. The reports shall begin during the first full year that the SPRINT technology is in use and continue for five years. Reports are subject to the following conditions.
 - a. Actual emissions for a given year shall be determined by the tested emission rates for that year and the actual hours of operation during the calendar year.
 - b. The total "past actual emissions" for Units 1 and 2 (2-year average) are 238 tons per year of carbon monoxide and 328 tons per year of nitrogen oxides.
 - c. In accordance with 40 CFR 52.21(b)(33)(ii), the permittee shall, "Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit's emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change, including any increased utilization due to the rate of electricity demand growth for the utility system as a whole." The permittee shall quantify any excluded emissions and provide a rationale.
 - d. The annual report shall compare actual emissions calculated for a given year with the past actual emissions identified above. If the comparison shows an increase in actual emissions greater than the PSD significant emission rates defined in Table 212.400-2, F.A.C., then Units 1 and 2 shall be subject to PSD preconstruction review at that time. The review shall include a determination of the Best Available Control Technology (BACT) for each PSD-significant pollutant.

[Rules 62-204.800, 62-210.200(11) and 62-212.400, F.A.C.; 40 CFR 52.21(b)(33)(ii)]

SECTION 4. APPENDICES

CONTENTS

Appendix A. Citation Format

Appendix B. General Conditions

Appendix C. Standard Conditions

SECTION 4. APPENDIX A

CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001" identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX B
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (previously applicable to gas turbines).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C

COMMON CONDITIONS

{Permitting Note: Unless otherwise specified by permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

SECTION 4. APPENDIX C
COMMON CONDITIONS

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.[Rule 62-297.310(4), F.A.C.]
14. Determination of Process Variables
 - a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.[Rule 62-297.310(5), F.A.C.]
15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the

SECTION 4. APPENDIX C
COMMON CONDITIONS

test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Leo Rajter
Vice President
Pasco Cogeneration, Limited
20 West 9th Street
Kansas City, MO 64105

2. Article Number (Copy from service label)

7000 2870 0000 7028 3345

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

11-10-03

C. Signature

X Michael Palmer

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

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Postage

\$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees

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Postmark
Here

Sent To

Leo Rajter

Street, Apt. No.; or PO Box No.

20 W. 9th St.

City, State, ZIP+4

Kansas City, MO 64105

PS Form 3800, May 2000

See Reverse for Instructions