

PASCO COGEN, LTD.

NCP Dade Power, LLC., General Partner

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March 17, 2009

Mr. David Zell
Florida Department of Environmental Protection
Southwest District Air Program
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
(813-632-7600)

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BUREAU OF AIR REGULATION

and

Mr. Jeff Koerner
Florida Department of Environmental Protection
Department of Air Regulation
2600 Blair Stone Road, MS # 5505
Tallahassee, FL 32399-2400
(850-488-0114)

RE: Pasco Cogeneration Facility; Facility ID No. 1010071; Several Comments
to the Proposed Title V Revision Project No. 1010071-007-AV and
Construction Permit Project No. 1010071-006-AC Draft Document

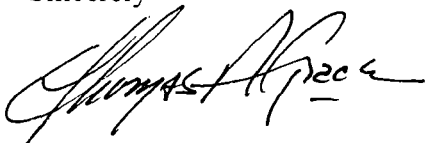
Dear Mr. Zell and Mr. Koerner:

In reviewing the proposed draft of the Pasco Cogen Title V permit, several questions/ comments came up. These are presented in the attached page to this letter. We would like the opportunity to present these to you prior to the end of the 30 day review period, which ends on March 22, 2009.

Once again we appreciate the Department's development of this document and the ability to provide you with our comments.

Please feel free to call me if there are any questions or concerns regarding this submittal and our comments. My telephone number is 917 472-4593 and my e-mail address is tgrace@caithnessenergy.com.

For Pasco Cogen
Sincerely



Thomas A. Grace, CHMM
Manager – Environmental, Health & Safety

Pasco Cogen

Proposed Title V 1010071-007 Comments:

1. Permitted Heat Capacity – Maximum Heat Input Rates, Condition A2. (a)(3). If the ratio for correction of heat input rate is constant then the rate for SPRINT at ISO should be 429 MMBtu/hr/CT rather than 425 MMBtu/hr/CT. Can this correction be made to Condition A2?
2. Emission Limitations Condition A7. In the attached table for Condition A7 there is no emission limitation provided for sulfur when combusting natural gas. This follows how the table has been written since 1993 and we do not disagree with the contents. However, under condition A5. the emission limits condition for subpart KKKK under 60.4330 goes on to discuss that the facility “must not burn in the subject stationary combustion turbine any fuel which contains total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input. If your turbine simultaneously fires multiple fuels, each fuel must meet this requirement.”

We agree that the facility will not fire any fuel with a sulfur content that creates sulfur emissions greater than 0.060 lb/MMBtu. However, there is confusion as to whether or not this is a number that should be used to calculate the potential emissions for the site. We contend it is not. The Pasco Cogen facility fires natural gas that is considered pipeline quality and is always below the 0.5 grain/100 scf concentration of sulfur required to demonstrate such under EPA definition (40 CFR 72.2). We would request that the language for Condition A.5 remain as is, but also include clarification that this facility has demonstrated to the Department that the natural gas fired by it meets the definition of “pipeline quality” fuel and that it is monitored as such. If necessary, the facility can provide the Department with data to demonstrate this. The fact that the facility fires pipeline quality fuel consistently was demonstrated in 1994 when the original customized monitoring schedule evaluation was performed and the data provided to the Department. If considered necessary, Pasco Cogen can demonstrate this once again for the Department.

3. Compliance Testing requirements, A11.(b). Earlier versions of the site Title V Permit only required CO compliance monitoring once every five years, prior to submittal of the five year permit renewal application. What was the basis for now requiring this annually? Can Pasco be returned to the original compliance requirement of once every five years prior to submittal of the renewal application?