



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

November 11, 2008

Mr. Richard Christmas, Plant Manager  
Pasco Cogeneration, Limited  
14850 Old State Road 23  
Dade City, Florida 33523

Re: Draft Air Permit No. PSD-FL-177E  
Project No. 1010071-006-AC  
Pasco Cogeneration Plant  
SPRINT Capacity Increase

Dear Mr. Christmas:

On September 11, 2008, Pasco Cogeneration, Limited submitted an application to modify the original air construction permit for existing combined cycle combustion turbine Units 1 and 2, which was subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. The proposal is to: increase the maximum heat input rate when firing natural gas by 5.4%; install continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO<sub>x</sub>); and revise the averaging period for the NO<sub>x</sub> standard and compliance method representing the Best Available Control Technology (BACT) determination to demonstrate compliance by CEMS instead of annual stack tests. Although not subject to PSD preconstruction review, the project will modify the original PSD permit to increase the capacity and revise the NO<sub>x</sub> BACT determination. Accordingly, you must publish the attached Public Notice of Intent to Issue Air Permit (Public Notice), which includes a 30-day comment period. Attached for your review are the following documents: Written Notice of Intent to Issue Air Permit; Public Notice; Technical Evaluation and Preliminary Determination; and Draft Permit and Appendices.

The Public Notice is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. Your application included a concurrent revision of the Title V air operation permit, which is being processed by the Department's Southwest District Office. Since the projects are being processed by separate offices, you have the option of: publishing the Public Notice included in this package for a modification of the PSD air construction permit; or, publishing a Public Notice combining the project to modify the PSD air construction permit with the project to revise the Title V air operation permit. Please let the Department's Southwest District Office know your preference so they can prepare the appropriate Public Notice. If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Pasco Cogeneration, Limited  
14850 Old State Road 23  
Dade City, Florida 33523

*Authorized Representative:*

Mr. Richard Christmas, Plant Manager

Air Permit No. PSD-FL-177E  
Project No. 1010071-006-AC  
Pasco Cogeneration Plant  
Facility ID No. 1010071  
SPRINT Capacity Increase

**Facility Location:** The applicant, Pasco Cogeneration, Limited, operates the existing Pasco Cogeneration Plant, which is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33523.

**Project:** On September 11, 2008, Pasco Cogeneration, Limited submitted an application to modify the original air construction permit for existing combined cycle combustion turbine Units 1 and 2, which was subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality. The proposal is to: increase the maximum heat input rate when firing natural gas by 5.4%; install continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO<sub>x</sub>); and revise the averaging period for the NO<sub>x</sub> standard and compliance method representing the Best Available Control Technology (BACT) determination to demonstrate compliance by CEMS instead of annual stack tests. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination. •

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet 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 Permitting Authority at

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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the address or phone number listed above. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit and requests for a public meeting for a period of 30 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-day period. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly. If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received comments result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241; Fax: 850/245-2303). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within fourteen 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 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 (in a proceeding initiated by another party) 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.

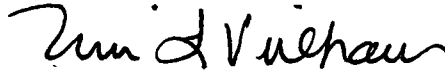
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; 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 when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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.

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

**Mediation:** Mediation is not available in this proceeding.

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 Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 11/12/08 to the persons listed below.

Mr. Richard Christmas, Pasco Cogeneration, Limited ([rchristmas@caithnessenergy.com](mailto:rchristmas@caithnessenergy.com))

Mr. Thomas Grace, Caithness Energy ([tgrace@caithnessenergy.com](mailto:tgrace@caithnessenergy.com))

Mr. Scott Osbourn, Golder Associates Inc. ([scott\\_osbourn@golder.com](mailto:scott_osbourn@golder.com))

Mr. David Zell, Southwest District Office ([david.zell@dep.state.fl.us](mailto:david.zell@dep.state.fl.us))

Ms. Cindy Zhang-Torres, Southwest District Office ([cindy.zhang-torres@dep.state.fl.us](mailto:cindy.zhang-torres@dep.state.fl.us))

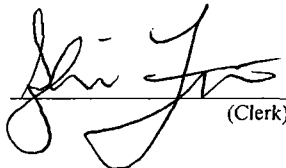
Ms. Kathleen Forney, EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))

Ms. Heather Abrams, EPA Region 4 ([abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov))

Ms. Vickie Gibson, BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


  
(Clerk)

11/12/08  
(Date)

# Florida Department of Environmental Protection

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## Memorandum

To: Trina Vielhauer, Bureau of Air Regulation  
From: Jeff Koerner, New Source Review Section   
Date: November 10, 2008  
Subject: Draft Air Permit No. PSD-FL-177E  
Project No. 1010071-006-AC  
Pasco Cogeneration Plant

This project was originally submitted to the Bureau of Air Regulation as a minor air construction permit revision with a concurrent Title V revision. We forwarded it to the Southwest District Office for processing and committed to co-reviewing the air construction permit request. The application includes the following requests: an increase in the maximum heat input rate when firing natural gas from 427 to 450 MMBtu per hour; installation of continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO<sub>x</sub>); and revision of the averaging period for the NO<sub>x</sub> standard and compliance method representing the Best Available Control Technology (BACT) determination to demonstrate compliance by CEMS instead of annual stack tests. Since the requests affect the original BACT determination, the Bureau of Air Regulation is responsible for the PSD permit revision. We are coordinating with the Southwest District Office to process the revised Title V air operation permit based on the draft PSD permit revision with a common public notice.

I recommend your approval of the attached Draft Permit package.

Attachments

## P.E. CERTIFICATION STATEMENT

### PERMITTEE

Pasco Cogeneration, Limited  
14850 Old State Road 23  
Dade City, Florida 33523

Draft Air Permit No. PSD-FL-177E  
Project No. 1010071-006-AC  
Pasco Cogeneration Plant  
SPRINT Capacity Increase

### PROJECT DESCRIPTION

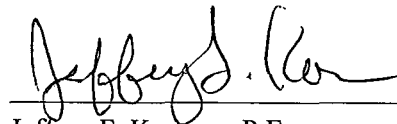
Pasco Cogeneration, Limited operates the Pasco Cogeneration Plant, which is an existing electrical generating plant located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33523. The facility consists of two combined cycle gas turbines (EU-001 and EU-002); an oil storage tank (EU-003); emergency generators (EU-004); and fugitive emissions (EU-005). The applicant proposes to: increase the maximum heat input rate when firing natural gas from 427 to 450 MMBtu per hour; install continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO<sub>x</sub>); and revise the averaging period for the NO<sub>x</sub> standard and compliance method representing the Best Available Control Technology (BACT) determination to demonstrate compliance by CEMS instead of annual stack tests.

Based on the applicant's projected emissions, the project will not result in emissions increases above the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review. Nevertheless, the project is a modification of the existing PSD permit to revise the NO<sub>x</sub> BACT standard for a new averaging period based on demonstrating continuous compliance by CEMS. Accordingly, the applicant will be required to publish a public notice with a 30-day comment period.

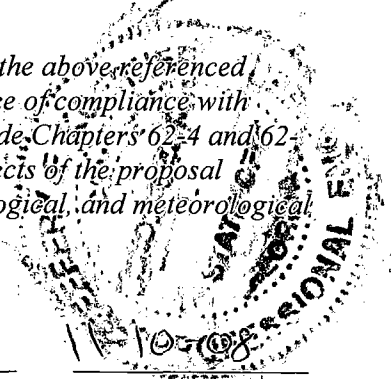
The PSD permit will be modified to: reflect SPRINT operation; revise the capacity; establish the corresponding mass emissions rates; specify the reporting requirements of Rules 62-212.300(1)(e) and 62-210.370, F.A.C. to ensure that the project does not trigger PSD preconstruction review; reflect compliance with the NO<sub>x</sub> standards to be demonstrated by data collected from the new CEMS based on a block average of the valid operating hours during a calendar day; allow data collected during the NO<sub>x</sub> RATA to demonstrate compliance with the NO<sub>x</sub> mass emissions limits; and clarify that the combined cycle combustion turbines are subject to the provisions of NSPS Subpart KKKK instead of NSPS Subpart GG. Since the corresponding "allowable" mass emissions rates will actually remain the same or be slightly reduced to reflect the original permit as requested in the application and there is no significant emissions increase, no new modeling is required.

The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

*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 any other aspects of the proposal (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.  
Registration No. 49441



(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation

Draft Air Permit No. PSD-FL-177E / Project No. 1010071-006-AC  
Pasco Cogeneration, Limited, Pasco Cogeneration Plant  
Pasco County, Florida

**Applicant:** The project applicant is Pasco Cogeneration, Limited. The applicant's authorized representative and mailing address is: Mr. Richard Christmas, Plant Manager, 14850 Old State Road 23, Dade City, Florida 33523.

**Facility Location:** Pasco Cogeneration, Limited operates the Pasco Cogeneration Plant, which is an existing electrical generating plant located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33523.

**Project:** The existing facility consists of two combined cycle gas turbines, an oil storage tank, and emergency generators. For the two combined cycle gas turbines, the applicant proposes to: increase the maximum heat input rate when firing natural gas by 5.4%; install continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO<sub>x</sub>); and revise the averaging period for the NO<sub>x</sub> standard and compliance method representing the Best Available Control Technology (BACT) determination to demonstrate compliance by CEMS instead of annual stack tests. The existing facility is a major stationary source as defined in Rule 62-212.200, F.A.C.; therefore, the project is subject to a preconstruction applicability review for the Prevention of Significant Deterioration (PSD) of Air Quality in accordance with Rule 62-212.400, F.A.C.

Based on the air permit application, the project will result in potential emissions increases of: 9 tons per year of carbon monoxide (CO); 13 tons per year of NO<sub>x</sub>; and 1 ton per year or less of particulate matter (PM), particulate matter with a mean diameter of 10 microns or less (PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>) and volatile organic compounds (VOC). As defined in Rule 62-210.200 of the Florida Administrative Code (F.A.C.), the project does not result in significant net emissions increases for any pollutant and the project is not subject to PSD preconstruction review. Nevertheless, the project is a modification of the existing PSD permit to revise the averaging period of the NO<sub>x</sub> BACT standard, which will subsequently be based on demonstrating continuous compliance by CEMS.

The PSD permit will be modified to: reflect SPRINT operation; revise the permitted capacity; establish corresponding mass emissions rates; specify the reporting requirements of Rules 62-212.300(1)(e) and 62-210.370, F.A.C. to ensure that the project does not trigger PSD preconstruction review; reflect compliance with the NO<sub>x</sub> standards to be demonstrated by data collected from the new CEMS based on a 24-hour block average of the valid operating hours during a calendar day; allow data collected during the NO<sub>x</sub> Relative Accuracy Test Audit to demonstrate compliance with the NO<sub>x</sub> mass emissions limits; and clarify that the combined cycle combustion turbines are subject to the applicable New Source Performance Standards (NSPS) of Part 60 in Title 40 of the Code of Federal Regulations established in Subpart KKKK instead of Subpart GG. Since the will not result in a significant emissions increase, no new modeling is required.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of

(Public Notice to be Published in the Newspaper)

the proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit and requests for a public meeting for a period of 30 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-day period. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly. If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received comments result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 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 (in a proceeding initiated by another party) 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 Permitting Authority'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 when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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 Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.





**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Pasco Cogeneration, Limited  
14850 Old State Road 23  
Dade City, Florida 33523  
  
Pasco Cogeneration Plant  
ARMS Facility ID No. 1010071

**PROJECT**

Draft Permit No. PSD-FL-177E  
Project No. 1010071-006-AC  
  
PSD Revision for SPRINT Capacity Increase

**COUNTY**

Pasco County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
New Source Review Section  
2600 Blair Stone Road, MS#5505  
Tallahassee, Florida 32399-2400

November 10, 2008

*Filename: 1010071-006-AC - TEPD.Doc*

## **1. GENERAL PROJECT INFORMATION**

### **Air Pollution Regulations**

Projects with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### **Facility Description and Location**

Pasco Cogeneration, Limited operates the Pasco Cogeneration Plant, which is an electrical generating plant (Standard Industrial Classification Code No. 4911). The existing facility consists of two combined cycle gas turbines (EU-001 and EU-002); an oil storage tank (EU-003); emergency generators (EU-004); and fugitive volatile organic compound emissions (EU-005). The facility is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33523. The UTM coordinates are Zone 17, 383.5 km East, and 3139.0 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### **Facility Regulatory Categories**

- The existing facility is not a major source of hazardous air pollutants (HAP).
- The existing facility has no units subject to the acid rain provisions.
- The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The existing facility is a major stationary source of air pollution pursuant to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The existing combined cycle gas turbines are subject to the applicable New Source Performance Standards (NSPS) in Part 60, Title 40 of the Code of Federal Regulations (CFR) including Subpart A (General Provisions) and Subpart KKKK (Stationary Combustion Turbines).

### **PSD Permit History**

Original Permit No. PSD-FL-177 (AC51-196460) authorized initial construction of the combined cycle combustion turbine facility. The following describes the subsequent revisions to the original permit.

#### *Modification, Permit No. PSD-FL-177A*

- Specific Condition No. 1: Revised emissions table to Table 1A.
- Specific Condition No. 2: Deleted condition that referenced the acceptable ambient concentrations (AAC) for beryllium, lead and mercury. The revisions also stated that the permit would be re-numbered accordingly, but it was never re-numbered.
- Specific Condition No. 6: Revised the last three bullets related to the maximum heat input rates and duct

firing.

- Specific Condition No. 16: Revised condition requiring combustion control and a space to accommodate future oxidation catalyst.
- Specific Condition No. 20: Revised condition that specified NSPS Subpart Dc and GG provisions.

*Modification, Permit No. PSD-FL-177B*

Specific Condition No. 20: Revised condition to add custom fuel monitoring plan for NSPS Subpart GG provisions.

*Modification, Permit No. PSD-FL-177C*

This amendment extended the expiration date of the permit.

*Modification, Permit No. PSD-FL-177D (Project No. 1010071-002-AC)*

This project authorized installation of the SPRINT technology with a slight increase in the heat input rate when firing natural gas and slight increases in the mass emissions rates for carbon monoxide (CO) and nitrogen oxides (NO<sub>x</sub>) emissions. Tests for CO and NO<sub>x</sub> emissions were required to demonstrate compliance.

### **Project Description**

The applicant, Pasco Cogeneration, Limited, submitted an application to modify air construction Permit No. PSD-FL-177 and concurrently revise the Title V air operation permit. The application includes the following requests for the two combined cycle gas turbines (EU-001 and EU-002): an increase in the maximum heat input rate when firing natural gas from 427 to 450 MMBtu per hour; installation of continuous emissions monitoring systems (CEMS) for NO<sub>x</sub>; and revision of the averaging period for the NO<sub>x</sub> standard and compliance method representing the Best Available Control Technology (BACT) determination to demonstrate compliance by CEMS instead of annual stack tests. Since the requests affect the original BACT determination, the Bureau of Air Regulation is responsible for the PSD permit revision. The Bureau of Air Regulation is coordinating with the Southwest District Office to process a revised Title V air operation permit based on the draft PSD permit revision with a common public notice.

### **Processing Schedule**

09/11/08 Department received the application for an air pollution construction permit; complete.

10/14/08 The Southwest District office transferred the air construction permit project to the Bureau of Air Regulation.

## **2. PSD APPLICABILITY REVIEW**

### **General PSD Applicability**

The Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program pursuant to Rule 62-212.400, F.A.C. A PSD applicability review is required in areas currently in attainment with the state and federal AAQS or areas otherwise designated as "unclassifiable". A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD major facility categories defined in Rule 62-210.200, F.A.C. for major stationary sources; or 5 tons per year of lead. Projects at new major stationary sources or major modifications to existing major stationary sources are subject to PSD preconstruction review. In addition, proposed projects at existing minor sources are subject to PSD preconstruction review if potential emissions *from the proposed project* will exceed the PSD major stationary source thresholds.

Once a project becomes subject to PSD preconstruction review, each of the following PSD pollutants is reviewed for PSD applicability based on emissions thresholds known as the "significant emission rates" defined

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

in Rule 62-210.200, F.A.C.: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); Fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as nonmethane organic compounds (NMOC); and mercury (Hg). Emissions from the project exceeding the significant emission rate 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 or project 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.

Rule 62-210.200, F.A.C. defines "BACT" as:

*An emission limitation, including a visible emissions standard, based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account:*

- 1. Energy, environmental and economic impacts, and other costs;*
- 2. All scientific, engineering, and technical material and other information available to the Department; and*
- 3. The emission limiting standards or BACT determinations of Florida and any other state;*

*determines is achievable through application of production processes and available methods, systems and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant.*

*If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of an emissions unit or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation.*

*Each BACT determination shall include applicable test methods or shall provide for determining compliance with the standard(s) by means which achieve equivalent results. In no event shall application of best available control technology result in emissions of any pollutant which would exceed the emissions allowed by any applicable standard under 40 CFR Parts 60, 61, and 63.*

In addition to a review and proposal of BACT, applicants must provide an Air Quality Analysis that evaluates the predicted air quality impacts resulting from the project for each PSD pollutant.

### PSD Applicability for the Project

Since the project will increase the maximum heat input rate for the combined cycle combustion turbines by 5.4% when firing natural gas, maximum actual hourly and annual emissions will increase. In Table 1-G of the application, the applicant provides the following PSD applicability analysis.

Pollutant	Baseline Emissions <sup>a</sup> TPY	Projected Actual Emissions <sup>b</sup> TPY	PSD Applicability Analysis		
			Increase from Project <sup>c</sup> TPY	PSD Significant Emissions Rate TPY	Subject To PSD?
CO	157.3	165.7	8.5	100	No
NO <sub>x</sub>	240.6	253.6	13.0	40	No

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Pollutant	Baseline Emissions <sup>a</sup> TPY	Projected Actual Emissions <sup>b</sup> TPY	PSD Applicability Analysis		
			Increase from Project <sup>c</sup> TPY	PSD Significant Emissions Rate TPY	Subject To PSD?
PM	15.5	16.3	0.8	25	No
PM <sub>10</sub>	14.4	15.1	0.8	15	No
SO <sub>2</sub>	7.2	7.5	0.4	40	No
VOC	9.5	10.0	0.5	40	No

### Notes:

- Baseline emissions are calculated as the average of the highest consecutive two-years of operation in the last five years.
- Projected actual emissions were calculated by scaling up the baseline emissions by 5.4%, which is the requested increase in heat input when firing natural gas. During the last five years, each combustion turbine fired much less than 1000 gallons of distillate oil per year.
- The increase from the project is the difference between the baseline and projected actual emissions.

Based on the applicant's projected emissions, the project will not result in emissions increases above the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review for the increased heat input rate. Nevertheless, the project is a modification of the existing PSD permit to revise the NO<sub>x</sub> BACT standard for a new averaging period based on demonstrating continuous compliance by CEMS. Accordingly, the applicant will be required to publish a public notice with a 30-day comment period.

### 3. PROJECT REVIEW

#### Increase in Maximum Heat Input Rate

The applicant proposes to increase the maximum heat input rate when firing natural gas from 427 to 450 MMBtu per hour based on the SPRINT upgrade and vendor recommendations. As previously shown, the 5.4% increase in capacity is not projected to result in emissions increases above the PSD significant emissions rates. The PSD permit will be revised to reflect SPRINT operation, revise the capacity, establish the corresponding mass emissions rates, require initial tests to demonstrate compliance with the CO and NO<sub>x</sub> standards, and specify the reporting requirements of Rules 62-212.300(1)(e) and 62-210.370, F.A.C. to verify that the project did not trigger PSD preconstruction review. The corresponding "allowable" mass emissions rates will actually remain the same or be slightly reduced to reflect the original permit as requested in the application. Therefore, no new modeling is required.

#### Install NO<sub>x</sub> CEMS for Demonstrating Compliance

The applicant proposes to install a NO<sub>x</sub> CEMS for the following reasons:

- Eliminate the existing Compliance Assurance Monitoring (CAM) Plan, which will be handled in the concurrent Title V permit revision by the Southwest District Office;
- Comply with the mandatory requirements of the Clean Air Interstate Rule (CAIR) in the event this rule is not ultimately vacated;
- Demonstrate compliance with the NSPS Subpart KKKK standards, which were previously incorporated into the Title V permit; and
- Demonstrate compliance with the NO<sub>x</sub> BACT standards.

The original PSD permit established the NO<sub>x</sub> BACT standards with compliance demonstrated by annual stack test. Because the CEMS will provide much more frequent compliance demonstrations, the applicant requests a revision of the NO<sub>x</sub> BACT standards to include a 30-day rolling compliance average. The Department

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

recognizes that this is the averaging period specified by the new NSPS Subpart KKKK provision for combined cycle combustion turbines. However, the Department's BACT determinations dating back to at least 1999 have been based on a 24-hour average. The Department believes that an averaging period greater than 24-hours would reduce the stringency of the BACT determination. Therefore, the PSD permit will be modified to reflect compliance with the NO<sub>x</sub> standards to be demonstrated by data collected from the new CEMS based on a 24-hour block average of the valid operating hours during a calendar day.

For firing natural gas, the current permit requires initial and annual tests for CO and NO<sub>x</sub> emissions. The "initial tests" have already been completed in accordance with the original permit and maximum heat input rate. The following table summarizes data from the most recent tests for Units 1 and 2.

Unit	Pollutant	Test Date	MMBtu/hour	Percent Capacity <sup>a</sup>	Tested Emissions	Emissions Limits
1	CO	01/04/07	433	96% <sup>b</sup>	22.5 ppmv	28 ppmv
	NO <sub>x</sub>	01/04/07	433	96% <sup>b</sup>	24.17 ppmvd @ 15% O <sub>2</sub>	25 ppmvd @ 15% O <sub>2</sub>
2	CO	07/13/06	405	> 90% <sup>c</sup>	27.20 ppmv	28 ppmv
	NO <sub>x</sub>	07/13/06	405	> 90% <sup>c</sup>	24.64 ppmvd @ 15% O <sub>2</sub>	25 ppmvd @ 15% O <sub>2</sub>

### Notes:

- The revised capacity is 450 MMBtu/hour based on the LHV of natural gas and a compressor inlet temperature of 51° F.
- The 01/04/07 test on Unit 1 was conducted at a compressor inlet temperature ranging from 51° F to 54° F.
- The tested heat input rate of Unit 2 during the 07/13/06 test was 405 MMBtu, which is 90% of the maximum heat input rate based on the LHV of natural gas and a compressor inlet temperature of 51° F. However, Unit 2 was conducted at a compressor inlet temperature greater than 90° F, which means the maximum heat input rate would be much less than 450 MMBtu/hour based on the LHV of natural gas. Therefore, the test was conducted well above 90% of the new permitted capacity.

The above tests were conducted after the SPRINT conversion package was installed and demonstrate compliance with the emissions standards. Therefore, no new initial tests will be required. Condition 10 of the permit will be clarified to identify compliance by CEMS for the new 24-hour block average for NO<sub>x</sub> emissions. In addition, this condition will be revised to allow data collected during the NO<sub>x</sub> RATA to demonstrate compliance with the maximum allowable NO<sub>x</sub> mass emissions rates (lb/hour).

### Applicable Federal Regulations

For the previous SPRINT modifications, the existing combined cycle combustion turbines became subject to the applicable provisions of NSPS Subparts A and KKKK. The PSD permit will be revised to clarify that the combined cycle combustion turbines are subject to these NSPS provisions instead of NSPS Subpart GG. The PSD permit will also be revised to identify the NSPS standards for NO<sub>x</sub> and SO<sub>2</sub> emissions.

## 4. PRELIMINARY DETERMINATION

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. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit changes. 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.

# DRAFT PSD PERMIT REVISION

## PERMITTEE

Pasco Cogeneration, Limited  
14850 Old State Road 23  
Dade City, Florida 33523

*Authorized Representative:*

Mr. Richard Christmas, Plant Manager

Air Permit No. PSD-FL-177E  
Project No. 1010071-006-AC  
Permit Expires: December 1, 2009  
Pasco Cogeneration Plant  
Facility ID No. 1010071  
SPRINT Capacity Increase

## PROJECT AND LOCATION

For combined cycle Units 1 and 2, this permit authorizes: an increase in the maximum heat input rate when firing natural gas from 427 to 450 MMBtu per hour; installation of continuous emissions monitoring systems (CEMS) for nitrogen oxides (NO<sub>x</sub>); and revision of the averaging period for the NO<sub>x</sub> standard and compliance method representing the Best Available Control Technology (BACT) determination to demonstrate compliance by CEMS instead of annual stack tests. The proposed work will be conducted at the Pasco Cogeneration Plant, which is an electrical generating plant (SIC No. 4911). The facility is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33523. 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 conduct the proposed work 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 existing facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is a modification of the original PSD permit; however, the project remains minor with respect to the resulting projected emissions increases.

## CONTENTS

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

Executed in Tallahassee, Florida

(DRAFT)

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Joseph Kahn, Director  
Division of Air Resource Management

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(Date)

**FACILITY AND PROJECT DESCRIPTION**

The existing facility consists of two combined cycle gas turbines (EU-001 and EU-002); an oil storage tank (EU-003); emergency generators (EU-004); and fugitive volatile organic compounds emissions (EU-005). For combined cycle Units 1 and 2, this permit authorizes: an increase in the maximum heat input rate when firing natural gas from 427 to 450 MMBtu/hour; installation of the NO<sub>x</sub> CEMS; and revision of the averaging period for the NO<sub>x</sub> standard and compliance method representing the BACT determination to demonstrate compliance by CEMS instead of annual stack tests.

**PREVIOUS PSD PERMIT AND MODIFICATIONS**

Permit No. PSD-FL-177 (AC51-196460) authorized initial construction of the combined cycle combustion turbine facility. The following describes the subsequent revisions to the original permit.

**Modification, Permit No. PSD-FL-177A**

- Specific Condition No. 1: Revised emissions table to Table 1A.
- Specific Condition No. 2: Deleted condition that referenced the acceptable ambient concentrations (AAC) for beryllium, lead and mercury. The revisions also stated that the permit would be re-numbered accordingly, but it was never re-numbered.
- Specific Condition No. 6: Revised the last three bullets related to the maximum heat input rates and duct firing.
- Specific Condition No. 16: Revised condition requiring combustion control and a space to accommodate future oxidation catalyst.
- Specific Condition No. 20: Revised condition that specified NSPS Subpart Dc and GG provisions.

**Modification, Permit No. PSD-FL-177B**

Specific Condition No. 20: Revised condition to add custom fuel monitoring plan for NSPS Subpart GG provisions.

**Modification, Permit No. PSD-FL-177C**

This amendment extended the expiration date of the permit.

**Modification, Permit No. PSD-FL-177D (Project No. 1010071-002-AC)**

This project authorized installation of the SPRINT technology with a slight increase in the heat input rate when firing natural gas and slight increases in the mass emissions rates for carbon monoxide (CO) and NO<sub>x</sub> emissions. Tests for CO and NO<sub>x</sub> emissions were required to demonstrate compliance.

**REGULATORY CLASSIFICATION**

- The existing facility is not a major source of hazardous air pollutants (HAP).
- The existing facility has no units subject to the acid rain provisions.
- The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The existing facility is a major stationary source of air pollution pursuant to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality
- The existing combined cycle gas turbines are subject to the applicable New Source Performance Standards (NSPS) in Part 60, Title 40 of the Code of Federal Regulations (CFR) including Subpart A (General Provisions) and Subpart KKKK (Stationary Combustion Turbines).



## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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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 the construction of minor sources shall be submitted to the Air Resources Section of the Department's Southwest District Office at 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926.
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 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926.
3. Appendices: Appendix A (CEMS Requirements) is attached as part of this permit.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
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 new emissions unit shall be constructed and no existing emissions unit shall be 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. Source Obligation: At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12)(c), F.A.C.]
8. Application for Title V Permit: This project included a request to process a concurrent Title V revision. The SWD Office is processing the concurrent application (No. 1010071-007-AV). [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]
9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
  - a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
  - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 10-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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- 1) The name, address and telephone number of the owner or operator of the major stationary source;
  - 2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
  - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
  - 4) Any other information that the owner or operator wishes to include in the report.
- c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the Department requires the annual reporting of actual CO and NO<sub>x</sub> emissions for combined cycle Units 1 (EU-001) and 2 (EU-002). The applicant estimated the baseline emissions for these pollutants as: 157.3 tons/year of CO emissions and 240.6 tons/year of NO<sub>x</sub> emissions.

[Rules 62-4.070(3), 62-212.300(1)(e) and 62-210.370, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

#### A. Combined Cycle Units 1 and 2

##### Emissions Units 001 and 002

**Description:** Each unit consists of a General Electric Model LM6000 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 based on the LHV: without SPRINT is 423 MMBtu per hour, which produces approximately 42 MW; or with SPRINT is 450 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. At base load conditions and a compressor inlet temperature of 51° F, exhaust gas exits the stack at approximately 250° F with a volumetric flow rate of approximately 320,253 acfm.

**CEMS:** Permit Modification No. PSD-FL-177E adds a NO<sub>x</sub> CEMS.

#### MODIFIED PERMIT CONDITIONS

The following changes refer to original Permit No. PSD-FL-177 and the subsequent modifications. The specific conditions of this permit were directly modified in Permit Nos. PSD-FL-177A, PSD-FL-177B, PSD-FL-177C and PSD-FL-177D. In addition, Permit PSD-FL-177D established several new conditions. For this new project, Permit PSD-FL-177E (Project 1010071-006-AC) will identify each specific condition as currently modified and show the new revisions. For clarity, all conditions of Permit PSD-FL-177D (Project No. 1010071-002-AC) will be superseded by this new permitting action. New text will be shown with double underline and deleted text will be shown with ~~strikethrough~~.

**Placard Page (Permit No. PSD-FL-177):** Revise description to, "For the construction of a ~~408~~ 130.5 MW combined cycle cogeneration facility to be located adjacent to the ~~Lykes-Paseo~~ a Citrus Processing Plant in Pasco County, Florida."

**Specific Condition No. 1 (Permit Nos. PSD-FL-177A and D):** Revise Table 1 A as follows.

1. The maximum allowable emissions from this facility shall not exceed the emission rates listed in Table 1A.

Table 1A (Revised). Pasco Cogen Limited Allowable Emissions Limits

Pollutant	Source <sup>a</sup>	Fuel <sup>b</sup>	Allowable Emissions Limits <sup>d</sup>				
			Basis of or Limit	Maximum Allowable Emissions Rates			
				@ 59° F		@ 51° F	
				lb/hour	TPY	lb/hour <sup>d</sup>	TPY <sup>e</sup>
NO <sub>x</sub> <sup>c</sup>	CT	NG	BACT <u>Limit: 25 ppmvd at 15% O<sub>2</sub> as determined by a 24-hour CEMS block average</u>  <u>NSPS Subpart KKKK Limit: 42 ppmvd at 15% O<sub>2</sub> as determined by a 30-day rolling CEMS average</u>	82.7	393.6	<del>86.0</del> <u>85.5</u>	404.7
	CT	DFO	BACT <u>Limit: 42 ppmvd at 15% O<sub>2</sub> as determined by a 24-hour CEMS block average</u>  <u>NSPS Subpart KKKK Limit: 96 ppmvd at 15% O<sub>2</sub></u>	143.9		148.3	

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

#### A. Combined Cycle Units 1 and 2

Pollutant	Source <sup>a</sup>	Fuel <sup>b</sup>	Allowable Emissions Limits <sup>d</sup>				
			Basis of or Limit	Maximum Allowable Emissions Rates			
				@ 59° F		@ 51° F	
				lb/hour	TPY	lb/hour <sup>d</sup>	TPY <sup>e</sup>
			<u>as determined by a 30-day rolling CEMS average</u>				
NO <sub>x</sub> <sup>c</sup>	DB	NG	BACT <u>Basis</u> : 0.1 lb/MMBtu <u>NSPS Subpart KKKK Limit: NO<sub>x</sub> emission from duct burners included in CT limits</u>	18.0		18.0	
	CT&DB	NG	<u>NSPS Subpart KKKK Limit: NO<sub>x</sub> emission from duct burners included in CT limits</u>	100.7		<del>104.0</del> 103.5	
CO	CT	NG	BACT <u>Basis</u> : 28 ppmvd	54.6	350.3	<del>56.5</del> 56.0	350.3
	CT	DFO	BACT <u>Basis</u> : 78 ppmvd	33.0		34.5	
	DB	NG	BACT <u>Basis</u> : 0.2 lb/MMBtu	36.0		36.0	
	CT&DB	NG	---	90.6		<del>92.5</del> 92.0	
PM/PM <sub>10</sub>	CT	NG	BACT <u>Basis</u> : 0.0065 lb/MMBtu	5.0	27.0	5.0	
	CT	DFO	BACT <u>Basis</u> : 0.0026 lb/MMBtu	20.0		2.0	
	DB	NG	BACT <u>Basis</u> : 0.006 lb/MMBtu	2.6		2.6	
	CT&DB	NG	---	7.6		7.6	
SO <sub>2</sub>	CT	DFO	<u>NSPS Subpart KKKK Limit: 0.05% sulfur by weight distillate oil</u>	<del>80.0</del>	<del>21.0</del>	<del>80.0</del>	<del>21.0</del>
			<u>Estab. By Applicant 0.1% S</u>	43.8	10.5	43.8	10.5
VOC	CT	NG	<u>Established Requested by Applicant to avoid PSD</u>	3.3	30.8	3.4	30.8
	CT	DFO	<u>Established Requested by Applicant to avoid PSD</u>	8.3		8.7	
	DB	NG	<u>Established Requested by Applicant to avoid PSD</u>	5.4		5.4	
	CT&DB	NG	---	8.7		8.8	
Sulfuric Acid Mist	CT	DFO	<u>Established Requested by Applicant to avoid PSD</u>	---	0.80	---	0.80

<sup>a</sup> CT = 2 combustion turbines, DB = 2 duct burners

<sup>b</sup> NG = natural gas, DFO = distillate fuel oil

<sup>c</sup> NO<sub>x</sub> limits for 59° F are at 60% relative humidity (ISO conditions). The CEMS-based BACT and NSPS NO<sub>x</sub> limits apply to each unit. The 24-hour block average for the BACT limit shall be determined from the valid CEMS operating data collected for each calendar day.

<sup>d</sup> Unless otherwise specified by this permit, compliance with the Maximum Allowable Emissions Limits shall be demonstrated for CT limits and CT&DB limits based on data from stack tests or data from the annual RATA.

<sup>e</sup> The Maximum Allowable TPY of emissions, based on a worst case scenario, are the sum of the CT emissions while firing NG for 355 days, the CT emissions while firing DFO for 10 days, and the DB

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

#### A. Combined Cycle Units 1 and 2

emissions at the maximum heat input for the previous combinations of CT firing. The DB will only fire only NG and only while the CT is firing NG.

- f. These are the Maximum Allowable Emissions Limits that shall never be exceeded at any temperature and/or operating configuration. All emissions standards also apply when utilizing the SPRINT technology and firing natural gas in the CT.

Note: All temperatures cited in this table refer to turbine inlet temperatures.

**Specific Condition No. 6 (Permit Nos. PSD-FL-177A and D):** Revise condition as follows.

6. The permitted materials and utilization rates for the combined cycle gas turbine shall not exceed the values as follows:

- Maximum distillate fuel oil consumption shall not exceed either of the following limitations: 2191 gals/hr/CT; 701,050 gals/yr/CT.
- Maximum annual firing using fuel oil shall not exceed an equivalent of 10 days per year at full load.
- Maximum sulfur (S) content in the oil shall not exceed ~~0.1~~ 0.05 percent by weight.
- Maximum heat input, based on the lower heating value (LHV) while burning gas shall not exceed ~~427~~ 450 MMBtu/hr/CT at 51° F or ~~403~~ 425 MMBtu/hr/CT when corrected to ISO conditions. The maximum heat input, based on the LHV while burning distillate fuel oil shall not exceed 424 MMBtu/hr/CT at 51° F or 406 MMBtu/hr/CT when corrected to ISO conditions.
- Duct firing shall be limited to natural gas firing only with a maximum heat input rate of 90 MMBtu/hr, based on the higher heating value of approximately 1054.5 Btu/cubic feet.
- Duct firing shall be limited to 525,000 MMBtu/year/HRSG-duct burner.

**Specific Condition No. 9 (Permit No. PSD-FL-177A and D):** Revise condition as follows.

10. Initial (I) compliance tests shall be performed on each CT using both fuels. The stack test for each turbine shall be performed within 10 percent of the maximum heat input rate for the tested operating temperature. Annual (A) compliance tests shall be performed on each CT with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods in accordance with the ~~November 2, 1989, version of~~ 40 CFR 60 Appendix A.

- a. 5 or 17 for PM (I, A, for oil only)
- b. 10 for CO (I, A)
- c. 9 for VE (I, A)
- d. 20 for NO<sub>x</sub> (I, A) Compliance with the maximum allowable mass emissions rates (lb/hour) shall be demonstrated by conducting annual tests or from data collected during the annual RATA tests for each CEMS. Compliance with the 24-hour block standard and annual limit shall be demonstrated by CEMS data.

Other ~~DER~~ Department-approved methods may be used for compliance testing after prior Department approval.

**Specific Condition No. 13 (Permit No. PSD-FL-177):** Replace entire condition regarding NSPS Subpart GG with the following.

13. Each combined cycle combustion turbine is subject to the applicable requirements of NSPS Subparts A and KKKK in 40 CFR 60. {Permitting Note: The applicable provisions of NSPS Subparts A and KKKK have already been included in the current Title V air operation permit and are not repeated here.}

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

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#### A. Combined Cycle Units 1 and 2

**Specific Condition No. 20 (Permit No. PSD-FL-177):** Replace entire condition regarding NSPS Subpart GG with the following.

20. Each combined cycle combustion turbine is subject to the applicable requirements of NSPS Subparts A and KKKK in 40 CFR 60. {Permitting Note: The applicable provisions of NSPS Subparts A and KKKK have already been included in the current Title V air operation permit and are not repeated here.}

#### NEW PERMIT CONDITIONS – SPRINT PROJECT

26. SPRINT Upgrade: The permittee is authorized to add General Electric's "SPRINT" spray inter-cooling technology. In general, the equipment consists of a system that will automatically meter approximately 9 to 12 gpm of de-mineralized water to a series of 24 spray nozzles. [Design]
27. CEMS Required: To demonstrate compliance with the NO<sub>x</sub> emissions concentration limits, the permittee shall install and operate a NO<sub>x</sub> CEMS in accordance with the provisions of 40 CFR 75, NSPS Subparts A and KKKK, and the requirements in Appendix A (CEMS Requirements) of this permit. [40 CFR 75, NSPS Subparts A and KKKK, and Rule 62-4.070(3), F.A.C.]
28. Previous Permits: For the affected emissions units, the conditions of this permit supplement all previously issued air construction and operation permits, which include operational restrictions, permitted capacities, and emissions standards as well as requirements for testing, monitoring, record keeping, reporting, etc. Unless specifically modified by this permit, the affected emissions units remain subject to all other applicable conditions specified in original Permit No. PSD-FL-177 as well as the subsequent Modifications A, B and C. This permit supersedes all of the conditions of Permit PSD-FL-177D (Project No. 1010071-002-AC). [Rule 62-4.070, F.A.C.]

## SECTION 4. APPENDIX A (DRAFT)

### CEMS REQUIREMENTS

*{Permitting Note for Draft Permit: This entire Appendix is new.}*

#### CEMS OPERATION PLAN

1. **Affected Units:** The permittee is required to install and operate a NO<sub>x</sub> CEMS on each of the two combined cycle gas turbines (EU-001 and EU-002).
2. **CEMS Operation Plan:** The owner or operator shall maintain a facility-wide plan for the proper installation, calibration, maintenance and operation of each NO<sub>x</sub> CEMS required by this permit. Copies of this plan shall be provided to the Compliance Authority and kept on site for review. The owner or operator shall revise this plan as necessary and provide updates to the Compliance Authority.

#### INSTALLATION, PERFORMANCE SPECIFICATIONS AND QUALITY ASSURANCE

3. **Installation Deadline:** The owner or operator shall install and operate a NO<sub>x</sub> CEMS in accordance with the provisions of 40 CFR 75 and NSPS Subparts A and KKKK in 40 CFR 60. For this project, each NO<sub>x</sub> CEMS has already been installed and certified.
4. **Installation:** All CEMS shall be installed such that representative measurements of emissions or process parameters from the facility are obtained. The owner or operator shall locate the CEMS by following the procedures contained in the applicable performance specification of 40 CFR Part 60, Appendix B.
5. **Span Values and Dual Range Monitors:** The owner or operator shall set appropriate span values for the CEMS. The owner or operator shall install dual range monitors if required by and in accordance with the CEMS Operation Plan.
6. **Continuous Flow Monitor:** For compliance with mass emission rate standards, the owner or operator shall install a continuous flow monitor to determine the stack exhaust flow rate. The flow monitor shall be certified pursuant to 40 FR Part 60, Appendix B, Performance Specification 6. Alternatively, the owner or operator may install a fuel flow monitor and use an appropriate F-Factor computational approach to calculate stack exhaust flow rate.
7. **Diluent Monitor:** If it is necessary to correct the CEMS output to the oxygen concentrations specified in this permit's emission standards, the owner or operator shall either install an oxygen monitor or install a CO<sub>2</sub> monitor and use an appropriate F-Factor computational approach.
8. **Moisture Correction:** If necessary, the owner or operator shall determine the moisture content of the exhaust gas and develop an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). *{Permitting Note: The CEMS Operation Plan will contain additional CEMS-specific details and procedures for installation.}*
9. **Performance Specifications:** The owner or operator shall evaluate the acceptability of each CEMS by conducting the appropriate performance specification, as follows. CEMS determined to be unacceptable shall not be considered installed for purposes of meeting the timelines of this permit. For NO<sub>x</sub> monitors, the owner or operator shall conduct Performance Specification 2 of 40 CFR Part 60, Appendix B.
10. **Quality Assurance:** The owner or operator shall follow the quality assurance procedures of 40 CFR Part 60, Appendix F. The required RATA tests for NO<sub>x</sub> shall be performed using EPA Method 7E in Appendix A of 40 CFR Part 60. NO<sub>x</sub> emissions shall be expressed "as NO<sub>2</sub>."
11. **Substituting RATA Tests for Compliance Tests:** Data collected during CEMS quality assurance RATA tests can substitute for annual stack tests, and vice versa, at the option of the owner or operator, provided the owner or operator indicates this intent in the submitted test protocol and follows the procedures outlined in the CEMS Operation Plan.

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## SECTION 4. APPENDIX A (DRAFT)

### CEMS REQUIREMENTS

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#### CALCULATION APPROACH

12. CEMS Used for Compliance: Once adherence to the applicable performance specification for each CEMS is demonstrated, the owner or operator shall use the CEMS to demonstrate compliance with the applicable emission standards as specified by this permit.
13. CEMS Data: Each CEMS shall monitor and record emissions during all periods of operation and whenever emissions are being generated, including during episodes of startups, shutdowns, and malfunctions. All data shall be used, except for invalid measurements taken during monitor system breakdowns, repairs, calibration checks, zero adjustments and span adjustments, and except for allowable data exclusions as per Condition 19 of this Appendix.
14. Operating Hours and Operating Days: For purposes of this Appendix, the following definitions shall apply. An hour is the 60-minute period beginning at the top of each hour. Any hour during which an emissions unit is in operation for more than 15 minutes is an operating hour for that emission unit. A day is the 24-hour period from midnight to midnight. Unless otherwise specified by this permit, any day with at least one operating hour for an emissions unit is an operating day for that emission unit.
15. Valid Hourly Averages: Each CEMS shall be designed and operated to sample, analyze and record data evenly spaced over the hour at a minimum of one measurement per minute. All valid measurements collected during an hour shall be used to calculate a 1-hour block average that begins at the top of each hour.
  - a. Hours that are not operating hours are not valid hours.
  - b. For each operating hour, the 1-hour block average shall be computed from at least two data points separated by a minimum of 15 minutes. If less than two such data points are available, there is insufficient data, the 1-hour block average is not valid, and the hour is considered as "monitor unavailable."
16. Compliance Averages: Compliance with the "24-hour block average" shall be determined for each calendar day of operation by calculating the arithmetic average of valid hourly averages collected during the calendar day.

#### MONITOR AVAILABILITY

17. Monitor Availability: The quarterly excess emissions report shall identify monitor availability for each quarter in which the unit operated. Monitor availability for the CEMS shall be 95% or greater in any calendar quarter in which the unit operated for more than 760 hours. In the event the applicable availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving the required availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.

#### EXCESS EMISSIONS

18. Definitions:
  - a. *Startup* is defined as the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
  - b. *Shutdown* means the cessation of the operation of an emissions unit for any purpose.
  - c. *Malfunction* means any unavoidable mechanical and/or electrical failure of air pollution control



## SECTION 4. APPENDIX A (DRAFT)

### CEMS REQUIREMENTS

equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

19. 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.
20. Data Exclusion Procedures for SIP Compliance: As per the procedures in this condition, limited amounts of CEMS emissions data may be excluded from the corresponding compliance demonstration, provided that best operational practices to minimize emissions are adhered to and the duration of data excluded is minimized. The data exclusion procedures of this condition apply only to SIP-based emission limits.
  - a. *Excess Emissions*. Data in excess of the applicable emission standard may be excluded from compliance calculations if the data are collected during periods of permitted excess emissions (for example, during startup, shutdown or malfunction). The maximum duration of excluded data is 2 hours in any 24-hour period, unless some other duration is specified by this permit.
  - b. *Limited Data Exclusion*. If the compliance calculation using all valid CEMS emission data, as defined in Condition 14 of this Appendix, indicates that the emission unit is in compliance, then no CEMS data shall be excluded from the compliance demonstration.
  - c. *Event Driven Exclusion*. The underlying event (for example, the startup, shutdown or malfunction event) must precede the data exclusion. If there is no underlying event, then no data may be excluded. Only data collected during the event may be excluded.
  - d. *Reporting Excluded Data*. The data exclusion procedures of this condition are not necessarily the same procedures used for excess emissions as defined by federal rules. Quarterly or semi-annual reports required by this permit shall indicate not only the duration of data excluded from SIP compliance calculations but also the number of excess emissions as defined by federal rules.
21. Notification Requirements: The owner or operator shall notify the Compliance Authority within one working day of discovering any emissions that demonstrate noncompliance for a given averaging period. Within one working day of occurrence, the owner or operator shall notify the Compliance Authority of any malfunction resulting in the exclusion of CEMS data. For malfunctions, notification is sufficient for the owner or operator to exclude CEMS data.

### ANNUAL EMISSIONS

22. CEMS Used for Calculating Annual Emissions: All valid data, as defined in Condition 14 of this Appendix, shall be used when calculating annual emissions.
  - a. Annual emissions shall include data collected during startup, shutdown and malfunction periods.
  - b. Annual emissions shall include data collected during periods when the emission unit is not operating but emissions are being generated (for example, when firing fuel to warm up a process for some period of time, prior to the emission unit's startup).
  - c. Annual emissions shall not include data from periods of time where the monitor was functioning properly but was unable to collect data while conducting a mandated quality assurance/quality control activity such as calibration error tests, RATA, calibration gas audit or RAA. These periods of time shall be considered missing data for purposes of calculating annual emissions.
  - d. Annual emissions shall not include data from periods of time when emissions are in excess of the calibrated span of the CEMS. These periods of time shall be considered missing data for purposes of calculating annual emissions.

## SECTION 4. APPENDIX A (DRAFT)

### CEMS REQUIREMENTS

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23. Accounting for Missing Data: All valid measurements collected during each hour shall be used to calculate a 1-hour block average. For each hour, the 1-hour block average shall be computed from at least two data points separated by a minimum of 15 minutes. If less than two such data points are available, the owner or operator shall account for emissions during that hour using site-specific data to generate a reasonable estimate of the 1-hour block average.
24. Emissions Calculation: Hourly emissions shall be calculated for each hour as the product of the 1-hour block average and the duration of pollutant emissions during that hour. Annual emissions shall be calculated as the sum of all hourly emissions occurring during the year.

**Livingston, Sylvia**

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**From:** Thomas Grace [tgrace@caithnessenergy.com]  
**Sent:** Thursday, November 13, 2008 8:52 AM  
**To:** Livingston, Sylvia; Richard Christmas  
**Cc:** scott\_osbourn@golder.com; Zell, David; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** RE: PASCO COGENERATION PLANT; 1010071-006-AC (PSD-FL-177E)

Sylvia,

The link was accessible and the documents have been recovered. Thank-you.

Tom Grace

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** 2008-11-12 13:06  
**To:** Richard Christmas; Thomas Grace  
**Cc:** scott\_osbourn@golder.com; Zell, David; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** PASCO COGENERATION PLANT; 1010071-006-AC (PSD-FL-177E)

Dear Sir/ Madam:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1010071.006.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1010071.006.AC.D_pdf.zip)

**Owner/Company Name:** PASCO COGEN LIMITED  
**Facility Name:** PASCO COGEN LIMITED  
**Project Number:** 1010071-006-AC/ PSD-FL-177E  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION/ SPRINT Capacity Increase  
**Facility County:** PASCO  
**Processor:** Jeff Koerner

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Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please

11/13/2008

**Livingston, Sylvia**

**From:** Richard Christmas [rchristmas@caithnessenergy.com] **Sent:** Wed 11/12/2008 1:29 PM  
**To:** Livingston, Sylvia; tgrace@caithnessenergy.com  
**Cc:** scott\_osbourn@golder.com; Zell, David; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** RE: PASCO COGENERATION PLANT; 1010071-006-AC (PSD-FL-177E)  
**Attachments:**

I am able to access and open the zipped PDF files the FLDEP sent to me.

Regards,

Richard Christmas

Plant Manager

Pasco Cogen

(352) 523 – 0062 ext. 22

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, November 12, 2008 1:06 PM  
**To:** rchristmas@caithnessenergy.com; tgrace@caithnessenergy.com  
**Cc:** scott\_osbourn@golder.com; Zell, David; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** PASCO COGENERATION PLANT; 1010071-006-AC (PSD-FL-177E)

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1010071.006.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1010071.006.AC.D_pdf.zip)

**Owner/Company Name:** PASCO COGEN LIMITED  
**Facility Name:** PASCO COGEN LIMITED  
**Project Number:** 1010071-006-AC/ PSD-FL-177E  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION/ SPRINT Capacity Increase  
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Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

<<1010071-006-AC\_Intent.pdf>>

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-0771  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

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