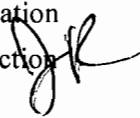


Memorandum

Florida Department of Environmental Protection

To: Trina Vielhauer, Bureau of Air Regulation
From: Jeff Koerner, New Source Review Section 
Date: August 27, 2009
Subject: Administrative Correction
Project No. 1010071-009-AC
Pasco Cogeneration Plant
Correction of Original Permit No. 1010071-006-AC (PSD-FL-177E)

Attached for your review is an administrative correction to original Permit No. 1010071-006-AC (PSD-FL-177E) for the Pasco Cogeneration Plant. This permitting action corrects typographical errors to the original permit. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk



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

ADMINISTRATIVE CORRECTION

In the Matter of an Administrative Correction:

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

Project No. 1010071-009-AC
Administrative Correction to:
Original Air Permit No. 1010071-006-AC
Pasco Cogeneration Plant, Units 1 and 2
Pasco County, Florida

Project: Enclosed is an administrative correction to Permit No. 1010071-006-AC (PSD-FL-177E) issued on April 6, 2009 for the SPRINT capacity increase on units 1 and 2 at the Pasco Cogeneration Plant. The existing plant is located in Pasco County at 14850 Old State Road 23, Dade City, Florida 33523. This action corrects typographical errors in Table 1A (Revised) in Condition 1 as attached.

Final Action: This administrative correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.) and Chapter 403, Florida Statutes (F.S.). This corrective action does not alter the effective dates of the existing permit. The Department of Environmental Protection (Department) will consider the above noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S. is not available for this proposed action.

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. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this permitting action. Petitions filed by any other person must be filed within 14 days of receipt of this permitting action. 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. If there are none, the petition must so state; (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

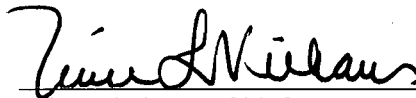
ADMINISTRATIVE CORRECTION

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 permitting action. 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.

Appeal: Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

(Date)

ADMINISTRATIVE CORRECTION

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that either this Administrative Correction, or a link to this document made available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 8/27/09 to the persons listed below.

Mr. Richard Christmas, Pasco Cogeneration, Limited (rchristmas@caithnessenergy.com)

Mr. Thomas Grace, Caithness Energy (tgrace@caithnessenergy.com)

Mr. Scott Osbourn, Golder Associates Inc. (scott_osbourn@golder.com)

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

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

Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

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

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

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

8/27/09
(Date)

ADMINISTRATIVE CORRECTION

As shown below, this permitting action corrects Table 1A (Revised) in Condition 1. Additions are denoted with double-underline and deletions are denoted with ~~strikethrough~~.

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

Pollutant	Source ^a	Fuel ^b	Allowable Emissions Limits ^f				
			Basis or Limit	Maximum Allowable Emissions Rates			
				@ 59° F		@ 51° F ^f	
				lb/hour	TPY	lb/hour ^d	TPY ^c
NO _x ^c	CT	NG	BACT Limit: 25 ppmvd at 15% O ₂ as determined by a 24-hour CEMS block average NSPS Subpart KKKK Limit: 42 ppmvd at 15% O ₂ as determined by a 30-day rolling CEMS average	82.7	393.6	85.5	404.7
	CT	DFO	BACT Limit: 42 ppmvd at 15% O ₂ as determined by a 24-hour CEMS block average NSPS Subpart KKKK Limit: 96 ppmvd at 15% O ₂ as determined by a 30-day rolling CEMS average	143.9		148.3	
	DB	NG	BACT Basis: 0.1 lb/MMBtu NSPS Subpart KKKK Limit: NO _x emission from duct burners included in CT limits	18.0		18.0	
	CT&DB	NG	NSPS Subpart KKKK Limit: NO _x emission from duct burners included in CT limits	100.7		103.5	
CO	CT	NG	BACT Basis: 28 ppmvd	54.6	350.3	56.0	350.3
	CT	DFO	BACT Basis: 78 ppmvd	33.0		34.5	
	DB	NG	BACT Basis: 0.2 lb/MMBtu	36.0		36.0	
	CT&DB	NG	---	90.6		92.0	
PM/PM ₁₀	CT	NG	BACT Basis: 0.0065 lb/MMBtu	5.0	27.0	5.0	<u>27.0</u>
	CT	DFO	BACT Basis: 0.0026 <u>0.026</u> lb/MMBtu	20.0		<u>20.0</u>	
	DB	NG	BACT Basis: 0.006 lb/MMBtu	2.6		2.6	
	CT&DB	NG	---	7.6		7.6	
SO ₂	CT	DFO	NSPS Subpart KKKK Limit: 0.05% sulfur by weight distillate oil	43.8	10.5	43.8	10.5
VOC	CT	NG	Requested by Applicant to avoid PSD	3.3	30.8	3.4	30.8
	CT	DFO	Requested by Applicant to avoid PSD	8.3		8.7	
	DB	NG	Requested by Applicant to avoid PSD	5.4		5.4	
	CT&DB	NG	---	8.7		8.8	
Sulfuric Acid Mist	CT	DFO	Requested by Applicant to avoid PSD	---	0.80	---	0.80

^a CT = 2 combustion turbines, DB = 2 duct burners

^b NG = natural gas, DFO = distillate fuel oil

ADMINISTRATIVE CORRECTION

- c. NO_x limits for 59° F are at 60% relative humidity (ISO conditions). The CEMS-based BACT and NSPS NO_x 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.
- d. 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.
- e. 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 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.

Permitting Notes: All temperatures cited in this table refer to turbine inlet temperatures. Demonstrate compliance with the annual SO₂ allowable emissions limit by calculating the actual SO₂ emissions from records of the actual fuel sulfur levels and fuel consumption rates of each fuel. For natural gas, fuel sulfur data provided by the natural gas pipeline vendor is sufficient. For distillate oil, the as-delivered fuel sulfur level based on analysis or vendor certification is sufficient.

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, August 27, 2009 4:28 PM
To: 'rchristmas@caithnessenergy.com'
Cc: 'tgrace@caithnessenergy.com'; '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 COGEN LIMITED; 1010071-009-AC
Attachments: 1010071-009-AC_Admin_Correct.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Administrative Correction** 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".

Note: 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/1010071.009.AC.A_pdf.zip

Owner/Company Name: PASCO COGEN LIMITED
Facility Name: PASCO COGEN LIMITED
Project Number: 1010071-009-AC
Permit Status: ADMIN
Permit Activity: ADMIN CORRECTION
Facility County: PASCO
Processor: Jeff Koerner

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

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 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 at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Tracking:

Livingston, Sylvia

From: Richard Christmas [rchristmas@caithnessenergy.com]
Sent: Tuesday, September 01, 2009 4:26 PM
To: Livingston, Sylvia; rchristmas@caithnessenergy.com
Cc: tgrace@caithnessenergy.com
Subject: RE: PASCO COGEN LIMITED; 1010071-009-AC

Ms. Livingston,

My apologies, I opened the document and then saved it to the Pasco Cogen server, forgetting you needed a reply.

Please accept this email as confirmation of receipt.

Regards,

Richard Christmas
Plant Manager
Pasco Cogen
(352) 523 – 0062 ext. 22

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, September 01, 2009 3:40 PM
To: rchristmas@caithnessenergy.com
Cc: tgrace@caithnessenergy.com
Subject: FW: PASCO COGEN LIMITED; 1010071-009-AC

Dear Sir/ Madam:

We have not received confirmation that you were able to access the documents attached to this August 27th e-mail. Please confirm receipt by opening the attachment and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

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Sent: Thursday, August 27, 2009 4:28 PM
To: 'rchristmas@caithnessenergy.com'
Cc: 'tgrace@caithnessenergy.com'; 'scott_osbourn@golder.com'; Zell, David; Zhang-Torres; 'forney.kathleen@epa.gov'; 'abrams.heather@epamail.epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
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Sylvia Livingston
Bureau of Air Regulation
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sylvia.livingston@dep.state.fl.us