

CALPINE

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January 16, 2002

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

RECEIVED

JAN 23 2002

BUREAU OF AIR REGULATION

RE: Auburndale Power Partners, L.P.
Construction of Wet Compression Addition

Dear Mr. Linero:

As discussed in our letter to you of October 3, 2001 and the department's response dated October 19, 2001 Auburndale Power Partners, L.P. (APP) intends to install and operate a wet compression system on emissions unit EU-001, the cogeneration turbine generator. This letter presents APP's view of this addition as well as answers to questions presented in the department's October 19th letter.

Following the modification, in June of 2001, of the APP permit for emissions unit EU-001 to allow for the addition of emissions unit EU-006, the operation of EU-001 is constrained by 4 separate limits on the NOx emission during natural gas fired operation (the wet compression system will be operated only during natural gas fired operation):

- 15 ppm (corrected) for a 24 hour average;
- 78.6 lb/hour emission;
- 177 Tons per year, and
- 9 ppm (corrected) for an annual average.

APP has not requested a change in any of these limits and will not exceed any of these limits following the addition of the wet compression system.

Although APP understands the department's position to be that the addition of the wet compression system constitutes a physical change for the purpose of increasing heat input and production under certain ambient conditions, the data submitted with the letter of October 3 was intended to demonstrate that APP would be able to operate the unit within the limits existing in the current permit following the installation of the wet compression system. Because the permit contains both short term (pound per hour) and long term (ton per year) limits, APP will be unable to increase emissions beyond those modeled in previous applications or contemplated by the department in previous permitting while maintaining compliance with the permit. This change will not result in a change in the facility's potential to emit, because that potential is already artificially limited by the constraints of the permit as modified in June of 2001. In this regard, APP believes that the department would be justified in modifying the APP permit to allow for the installation and operation of the wet compression system without making additional requirements in the permit limiting the operation of this system.

Specific answers to the questions in the department's October 19 letter are below.

1. Will fogging be used for oil operation or only natural gas?

APP Response:

The wet compression system will be operated only during natural gas operation.

2. Please identify the specific ambient temperature range during which the use of foggers is requested and the corresponding CT heat input vs. temperature relationship (curve) for each fuel where the use of foggers is requested.

APP Response:

APP requests use of the wet compression system at an ambient temperature of 60 degrees F and above. Please see attachment 1 showing ambient temperature – heat input data.

3. Your letter stated that the fogger design is intended to replicate 60 degree F operation. Please identify the heat input at 60 degrees F for each fuel where the use of foggers is requested.

APP Response:

Please see attachment 1 showing ambient temperature data.

4. Please specify the annual hours for which the use of foggers is requested. Alternately, you may use National Weather Service data to calculate hours above 60 degrees, however the Department intends to limit the use of foggers via annual hours. According to the National Weather Service, normal daily temperatures for Tampa, Florida exceed 59 degrees for each month.

APP Response:

As discussed above, APP believes that the permit as modified already contains sufficient restrictions to prevent the operation of this system from creating an increase in emissions above currently permitted levels, and that no additional restrictions are appropriate. The design of the system does not allow for operation below an ambient temperature of 55 degrees F. APP does not propose to operate the system below an ambient temperature of 60 degrees F. Based on National Weather Service data for Tampa, the number of hours when the ambient temperature is above 60 degrees can be anticipated to be approximately 7854 hours per year.

APP appreciates your prompt consideration of this issue.

Sincerely,

AUBURNDALE POWER PARTNERS, L.P.



Benjamin M. H. Borsch, P.E.
Environmental Manager

**ATTACHMENT 1
HEAT INPUT CURVES
WET COMPRESSION OPERATION**

Figure 1 attached shows the results of test operation of the wet compression system on the APP cogeneration turbine (EU-001). This data shows that operation of the unit gave heat input values in the range 1275 – 1310 MMBtu/hr at base load for operation at ambient temperatures from 70 to 92 degrees Fahrenheit. A regression line has been applied to provide a predicted operating line for the unit.

Figure 2, attached, shows a comparison between the regression line generated in Figure 1 and the unit data supplied with the 1992 permit application. This comparison shows that the approximate effect of the wet compression system is to allow the unit to operate closer to the cold day operating scenario under a range of higher ambient temperature conditions.

Ambient Temperature F

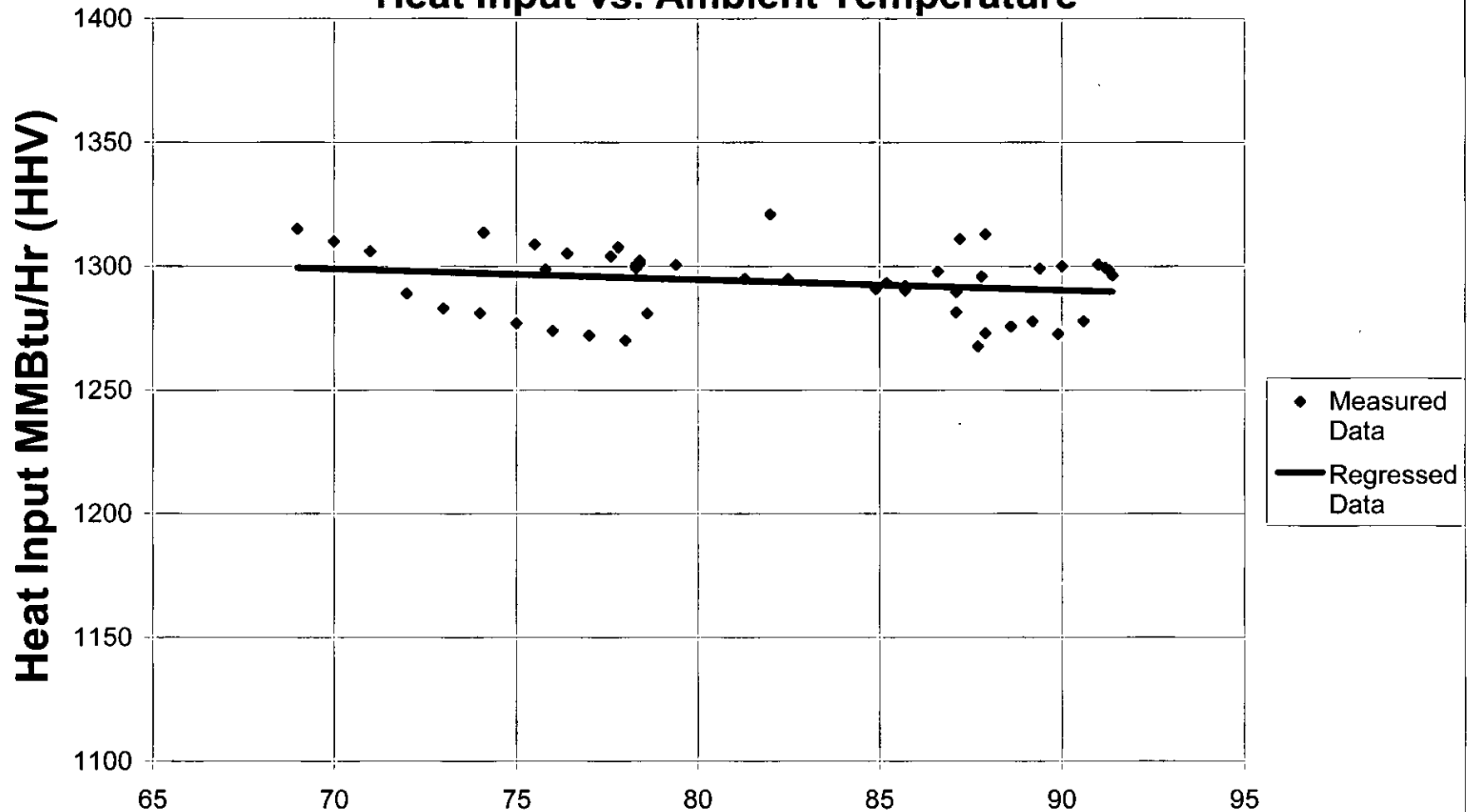
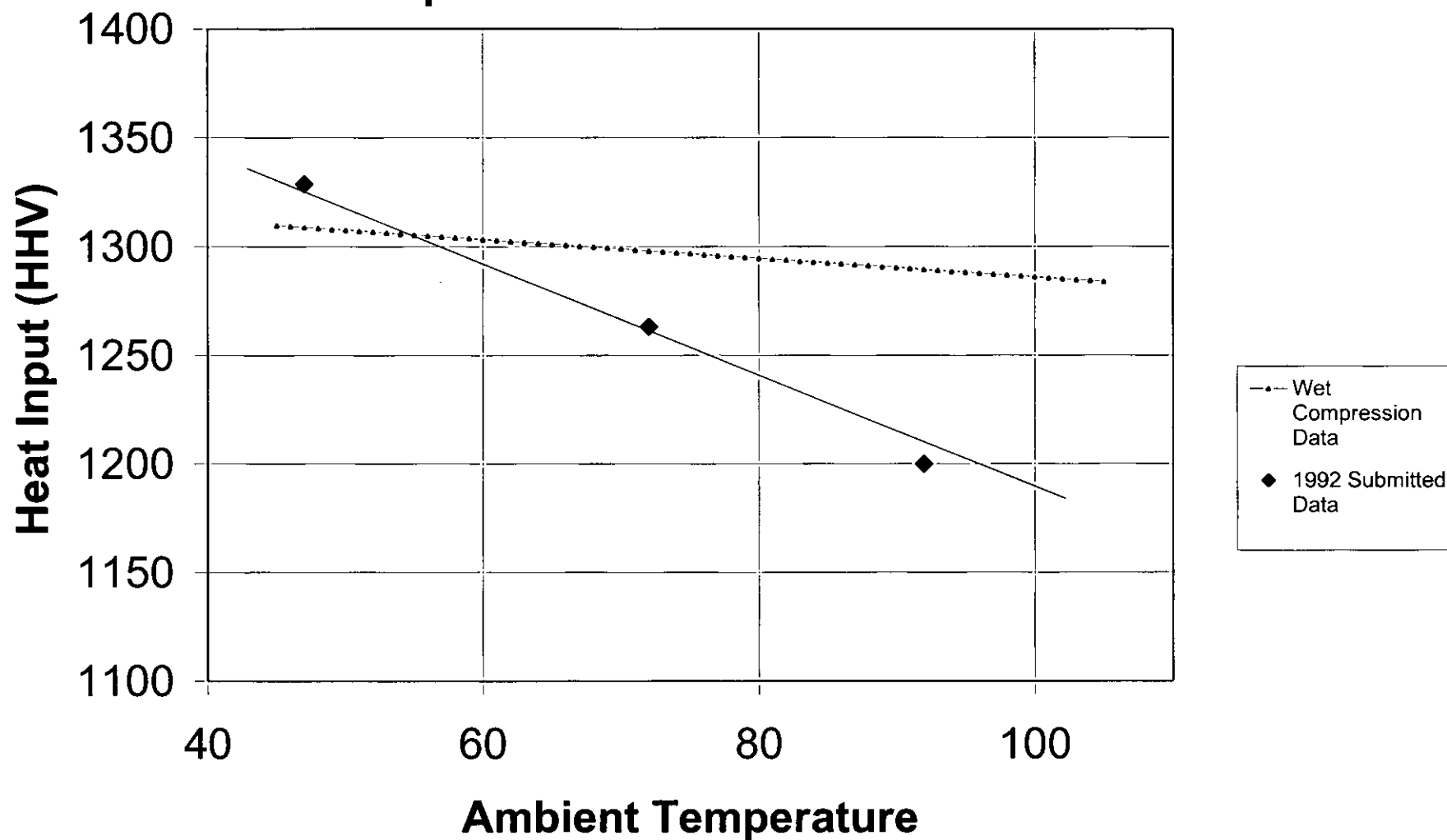


Figure 2
Wet Compression vs. Previous Submitted Data



AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No

RECEIVED

STATE OF FLORIDA)
COUNTY OF POLK)

FEB 05 2002

BUREAU OF AIR REGULATION

Before the undersigned authority personally appeared Ken Holtzinger, who on oath says that he is the Classified Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a Notice of Intent

Dep File No. 1050221-005-AC

in the matter of.....

in the.....

Court, was published in said newspaper in the issues of.....
2-2, 2002

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed.....

Ken Holtzinger
Classified Manager
Who is personally known to me.

Sworn to and subscribed before me this.....

day of.....

A.D. 20 02

Notary Public

PATRICIA ANN ROUSE

(Seal)

My Commission Expires.....

11740070

G301 Auburndale Power Partners J. Shaske

Attach Notice Here

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1050221-005-AC
Auburndale Cogeneration Facility
Auburndale, Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Caprine, for the Auburndale Cogeneration Facility located at 1501 West Derby Avenue, Auburndale, Polk County. The permit is to install a wet compression system on the existing Combined Cycle Gas Turbine at the facility. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62.212(4)(F) A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's mailing address is: Caprine Eastern Corporation, Island Center, 2701 N. Rocky Point Drive, Suite 1200, Tampa FL 33607.

A PSD Applicability Determination was made and emissions of regulated pollutants will not increase above the de minimis thresholds established for PSD Review. There will be no change to hours of operation or fuel types as a result of this modification, although fuel throughput is expected to increase.

Total increases in the emissions of PSD pollutants as a result of this project are as follows:

Pollutant	Emission Factor (lb/MMBtu)	Increased Annual lbs	Increased Tons/yr	PSD Significant Emission Rate	Review Required
PM ₁₀	0.008	2431	1.2	15	No
SO ₂	0.032	9724.4	4.9	40	No
NO _x	0.062	18841	9.4	40	No
CO	0.034	10332	5.2	100	No

An air quality impact analysis was not conducted, nor required. The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 days from the date of publication of this Public Notice of Intent to issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #38, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.603(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.603(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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

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

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

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


Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/722-6979	Dept. of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619-1118 Telephone: 813/744-6100 Fax: 813/744-6084
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The complete project file includes the application, technical evaluations, Draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The Technical Evaluation and PSD Applicability Determination, as well as the Draft Permit may be viewed at:
<http://www.dep.state.fl.us/air/permitting.htm#construction>

G301 2-2-2002

Memorandum

Florida Department of Environmental Protection

TO: C.H. Fancy
THRU: Al Linero
FROM: M. P. Halpin 
DATE: January 25, 2002
SUBJECT: Auburndale Power Partners L.P.

Attached for approval and signature is a construction permit for a minor modification at the Auburndale Cogeneration Facility, located in Auburndale, Polk County. The permit is to install one wet compression system on the Combined Cycle Unit at the existing facility. The wet compression system is similar to the application of foggers.

A Determination was made that the project is not subject to a PSD review or a BACT Determination. Modeling was not required, as the emission increases from this project are insignificant.

I recommend your approval and signature.

Attachments

/mph