1050221-001-AC

AUBURNDALE POWER PARTNERS, LIMITED PARTNERSHIP

November 14, 1995

RECEIVED

Mr. A.A. Linero, P.E. Administrator Florida Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Road Tallahassee, FL 32399-2400 NOV 16 1995 BUREAU OF

AIR REGULATION

Re:

Auburndale Cogeneration Facility Construction Permit AC53-208321 Annual Compliance Testing Requirements

Dear Mr. Linero:

As requested in your October 25, 1995 letter, Auburndale Power Partners (APP), Limited Partnership is enclosed a check for \$250.00 for the processing fee for the amendment of permit AC53-208321. The details of this petition are contained in letter submitted to your office on September 13, 1995.

Do not hesitate to contact me at (941) 965-1561 if you have any questions regarding this subject.

Sincerely,

Donald W. Fields
Executive Director

Auburndale Power Partners

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RF

Enclosures

AUBURNDALE POWER PARTNERS, LIMITED PARTNERSHIP

November 17, 1995.

Mr. Clair H. Fancy, P.E. Chief, Bureau of Air Regulation Florida Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Road Tallahassee, FL 32399-2400



Re: Auburndale Cogeneration Facility;

Notification of NO_X and CO₂ Certification Testing

Dear Mr. McNeal:

This letter is to notify the FDEP that Auburndale Power Partners (APP), Limited Partnership will be conducting annual emission testing for the NO_X and CO beginning on December 18, 1995.

If you have any questions, please contact me at (941) 965-1561.

Sincerely,

Donald W. Fields

Designated Representative

Auburndale Cogeneration Facility

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cc: N

Mr. Axel Santiago, APP

Mr. Tom Davis, ECT

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AUBURNDALE POWER PARTNERS LIMITED PARTNERSHIP

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Fair Lakes Circle • Suite 420 Fairfax, Virginia 22033-3804 Phone (703) 222-0445 • Fax (703) 222-5524

1501 Derby Avenue Auburndale, Florida 33823 Phone (941) 965-1561 • Fax (941) 965-1924

September 13, 1995

Mr. Clair H. Fancy, P.E. Chief, Bureau of Air Regulation Florida Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Road Tallahassee, FL 32399-2400

RECEIVED. SEP 1 5 1995.

Bureau of Air Regulation

Re: Auburndale Cogeneration Facility
Construction Permit AC53-208321
Annual Compliance Testing Requirements

Dear Mr. Fancy:

Specific Condition No. 8 of Construction Permit AC53-208321 issued to Auburndale Power. Partners (APP) for their cogeneration facility located in Auburndale, Florida requires annual stack testing for sulfuric acid mist and volatile organic compounds (VOCs) among other pollutants. APP requests that Construction Permit AC53-208321 be revised to delete the annual testing requirement for sulfuric acid mist and VOCs for the following reasons:

- (1) The Auburndale cogeneration facility is fired primarily with natural gas. Use of back-up No. 2 fuel hour is limited to no more than 400 hours per year in accordance with Specific Condition No. 5.b. Because natural gas contains a negligible amount of sulfur, sulfuric acid mist emissions will also be negligible. Initial compliance testing conducted in June 1994 yielded a measured sulfuric acid mist emission rate 0.87 pounds per hour (lb/hr) or only 12 percent of the allowable limit of 7.5 lb/hr. Regulation 62-297.340(e), F.A.C. states that annual compliance tests for PM emissions shall not be required for any fuel burning source that does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours per year. It is believed that the same rational would also apply to the testing of sulfuric acid mist emissions; and
- (2) Initial compliance testing for VOCs resulted in low emission rates for both natural gas and distillate oil fuels. Specifically, measured VOC emission rates were only 15 and 5 percent of the allowable rates for natural gas and distillate fuel oil firing, respectively. Actual measured VOC emission rates were 0.91 and 0.52 lb/hr for natural gas and distillate fuel oil firing, respectively. Such low emission rates would not be expected to have any significant impact on ambient air quality. Also, the Auburndale cogeneration facility is located in an area (Polk County) which is classified attainment for all criteria pollutants including ozone.

Mr. Clair H. Fancy, P.E. September 7, 1995 Page -2-

Annual testing for sulfuric acid mist and VOC imposes a significant economic burden to APP. There is no reason to expect future sulfuric acid mist and VOC emission rates to differ significantly from the low rates measured in June 1994. APP would therefore appreciate having Specific Condition No. 8 of Construction Permit AC53-208321 revised to delete the requirement for annual testing of sulfuric acid mist and VOC emissions.

Please contact me at (813) 965-1561 if there are any questions regarding this request.

Sincerely,

Don Fields

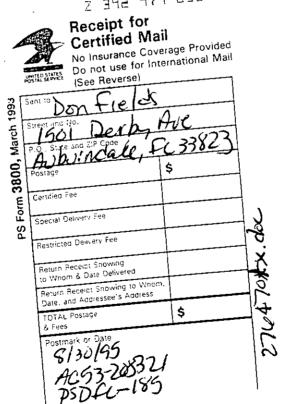
Executive Director

Auburndale Power Partners

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on the reverse side?	• Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so the return this card to you. • Attach this form to the front of the mailpiece, or on the back is does not permit. • Write "Return Receipt Requested" on the mailpiece below the art. • The Return Receipt will show to whom the article was delivered a delivered.	if space 1. Addressee's Address
our RETURN ADDRESS completed of		4a. Article Number Z 392 979 033 4b. Service Type Registered COD Express Mail Return Receipt for Merchandise 7. Date of Delivery 8. Addressee's Address (Only if requested and fee is paid)

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Department of **Environmental Protection**

file

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

Virginia B. Wetherell Secretary

August 30, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Fields
Executive Director
Auburndale Power Partners
1501 Derby Avenue
Auburndale, Florida 33823

Dear Mr. Fields

Re: Extension of Permit No. AC 53-208321, PSD-FL-185 Auburndale Cogeneration Facility

On August 17 the Department received your application letter, dated August 11, requesting an extension of the expiration date of the above referenced permit. The attached proposed rule language will, if adopted, extend the air construction permit by law. It is anticipated that the rule will be adopted in early September. If the rule is adopted within 90 days of receipt of your application, the Department will not be required to respond further. However, we will inform you upon adoption of the proposed rule.

If the rule, for any reason, is not adopted within 90 days of receipt of your application we will act upon your request in a timely manner. Please note that your air construction permit is valid until the Department acts upon your request.

Should you have any questions please contact me at (904) 488-1344.

Sincerely,

A. A. Linero, P.E.

Administrator, New Source Review Section

AAL/kw

Attachment

cc: Gene Bergfield, APP
Tom Davis, ECT
Dave Sanches, APP
Axel Santiago, APP

NOTICE OF CHANGE IN PROPOSED RULE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DOCKET NO: 95-38R

CHAPTER TITLE: CHAPTER NO.:

Operation Permits for Major Sources of Air

Pollution 62-213

RULE TITLE: RULE NO.:

Permit Applications

62-213.420

The Department has made a change to the proposed rule which appeared in the Florida Administrative Weekly, Volume 21, Number 30, dated July 28, 1995, page 4958, so that the following section(s) will read as set forth below:

62-213.420 Permit Applications

- (1)(a)1.a. Acid Rain Sources will submit applications for the entire source by <u>June 15, 1996 January 1, 1996</u>. <u>The Acid Rain Part of each such application, however, shall be submitted no later than January 1, 1996</u>.
 - b.(ii) June 15, 1996 February 1, 1996, otherwise.
- c. All other sources subject to the permitting requirements of this chapter will submit applications by <u>June 15, 1996</u> February 1, 1996.
- 2. Except as provided at Rule 62-213.420(1)(a)4., F.A.C., except for sources that are subject to the Florida Electrical Power Plant Siting Act (FEPPSA), a source that commences operation after January 1, 1996, must file an application for an operation permit under this chapter ninety days before expiration of the source's construction permit, but no later than 180 days after commencing operation. Except as provided at Rule 62-213.420(1)(a)4., F.A.C., aA source that has applied for an Electrical Power Plant Siting Certification prior to January 1, 1996, but has not but has not been issued the certification as of that date, or a source that has been issued an Electrical Power Plant Siting Certification prior to January 1, 1996, but has not commenced operation by that date, shall file an application for an operation permit under this cehapter no later than 180 days after commencing operation. Sources subject to the FEPPSA that apply for Electrical Power Plant Siting Certification subsequent to January 1, 1996, may, at their option, shall apply for a permit under the provisions of this chapter at the same time the Florida Power Plant Siting Certification application is submitted.
- 4. The expiration dates of all air construction permits for Title V sources that expire between September 1, 1995, and November 1, 1996 September 1, 1996, are hereby extended to the later of November 1, 1996, or 240 days after commencing operation September 1, 1996. Facilities with such air construction permits which have not commenced operation on January 1, 1996, shall apply

for a permit under the provisions of this chapter on the later of September 1, 1996, or 180 days after commencing operation.

Specific Authority: 403.061, 403.087, F.S.

Law Implemented: 403.061, 403.0872, F.S.

History: New 11-28-93; Amended 4-62-94; Formerly 17-213.420; Amended 11-23-94, 4-2-95.

NAME OF PERSON ORIGINATING PROPOSED RULE: Howard L. Rhodes, Director, Division of Air Resources Management
NAME OF SUPERVISOR OR PERSON WHO APPROVED THE PROPOSED RULE:
Virginia B. Wetherell, Secretary
DATE PROPOSED RULE APPROVED: July 17, 1995

AUBURNDALE POWER PARTNERS, LIMITED PARTNERSHIP

November 17, 1995.

Mr. Clair H. Fancy, P.E. Chief, Bureau of Air Regulation Florida Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Road Tallahassee, FL 32399-2400



Re:

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Sincerely,

Donald W. Fields

Designated Representative

Auburndale Cogeneration Facility

cc:

Mr. Axel Santiago, APP

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Mr. Tom Davis, ECT

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Department of Environmental Protection

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

Virginia B. Wetherell Secretary

October 20, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Fields
Executive Director
Auburndale Power Partners, Limited Partnership
1501 Derby Avenue
Auburndale, Florida 33823

Dear Mr. Fields:

Re: Extension of Permit No. AC53-208321, PSD-FL-185 (AIRS ID 1050221)

In accordance with our previous correspondence, enclosed you will find a copy of the recently enacted rule language which extends your air construction permit (Rule 62-213.420(1)(a)4., F.A.C.). Therefore, no action is required by the Department and your \$50 fee will be refunded.

Please note the new application dates for the Title V permits have been changed. The acid rain part of the application is due not later than January 1, 1996. The remaining part of your Title V application is due on June 15, 1996.

If you have any questions, contact Mr. Al Linero at the letterhead address or call him at (904)488-1344.

Sincerely,

C. H. Fancy, P.E.

Chief, Bureau of Air Regulation

CHF/al/kw

Enclosure

r RETURN ADDRESS completed on the reverse side?	SENDER: Complete items 1 and/or 2 for additional services. Complete items 3, and 4a & b. Print your name and address on the reverse of this form so that return this card to you. Attach this form to the front of the mailpiece, or on the back it does not permit. Write "Return Receipt Requested" on the mailpiece below the article The Return Receipt will show to whom the article was delivered at delivered. Article Addressed to: Mr. Don: Fields Executive Director Auburndale Power Partners, L.P. 1501 Derby Avenue Auburndale, Florida 33823 Signature (Addressee) 6. Signature (Agent)	if space 1. Addresseé's Addre	you for using Return Receipt Service.
ls you	PS Form 3811 , December 1991 ±U.S. GPO: 1993-352	2-714 DOMESTIC RETURN REC	EIPT

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	Executive Direc	tor	
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PS Form 3800 , March 1993	Postmark or Date Rule Change (extension) AC53-208321 PSDFL-185 AIRS ID 1050221		