

AUBURNDALE POWER PARTNERS, LP

1501 West Derby Avenue • Auburndale, Florida 33823

Phone (863) 965-1561 • Facsimile (863) 965-1924

RECEIVED

May 10, 2010

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**BUREAU OF
AIR REGULATION**

Mr. Jonathan K. Holtom, P.E., CPM
Program Administrator, Title V Section
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 23
Tallahassee, FL 32301

**Re: Auburndale Power Partners
Permit No. 1050221-016-AV
Request for Additional Information**

Dear Mr. Holtom:

Project No - 1050221-016-AV

On March 1, 2010, Auburndale Power Partners, LP (APP) submitted a Title V air operation permit application to the Department. In response to this permit application, the Department requested additional information in correspondence to APP dated April 29, 2010.

This letter provides a response to each specific issue raised by the Department. For your convenience, we have restated each issue followed by our response.

FDEP-1

Please specify if any of the facility's generators or other emissions units are subject to 40 CFR 60 Subpart 1111, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (we note that all engines are subject to Subpart ZZZZ), or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines. If applicable,

1. Please specify how the facility is complying with the applicable subpart(s).
2. Please provide the following information for each emission unit subject to the referenced subparts: in-service date, cylinder displacement, and rule applicability.

Response to FDEP-1

The APP facility, which is a minor (i.e., area) source of hazardous air pollutants (HAPs), includes one 265 brake horsepower (bhp) emergency firewater pump compression

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ignition (CI) diesel engine. On March 3, 2010, following submittal of the APP Title V permit application, EPA promulgated a final rule amending 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This regulation is applicable to stationary reciprocating internal combustion engines (RICE) located at major or area HAP sources.

In accordance with 40 CFR §63.6603, existing stationary CI RICE of all sizes located at an area source of HAP emissions must comply with the applicable requirements of Table 2b and Table 2d. Table 2b does not contain any requirements that are applicable to the APP emergency firewater pump CI diesel engine. Table 2d contains management and work practice requirements (e.g., change engine oil and filter every 500 hours of operation or annually, whichever comes first, minimize startup operations, etc.) that will be applicable to the APP emergency firewater pump CI diesel engine.

As required by 40 CFR §63.6625(e), existing stationary emergency RICE not subject to any numerical emission standards must operate and maintain the stationary RICE according to the engine manufacturer's emission-related written instructions or must develop a maintenance plan. Engine operating time spent at idle during startup and engine startup duration must be minimized per 40 CFR §63.6625(h). An option to extend the specified oil change requirements in Table 2d utilizing an oil analysis program is provided in 40 CFR §63.6625(i).

In accordance with 40 CFR §63.6595, existing stationary CI RICE located at an area source of HAP emissions are required to comply with the applicable provisions of Subpart ZZZZ no later than May 3, 2013. Existing stationary emergency CI RICE are not required to provide notifications pursuant to 40 CFR §63.6645(a)(5).

APP will comply with the above Subpart ZZZZ requirements for the emergency firewater pump diesel engine no later than May 3, 2013.

FDEP-2

The requested changes to the current Title V air operation permit (Attachment H of the Application dealing with excess emissions and NO_x CEMS) will require an air construction permit to implement.

Response to FDEP-2

APP requests concurrent processing of an air construction permit application (i.e., revisions to Permit No. 1050221-010-AC and PSD-FL-185) and Title V permit. A revised Page 2 of the Department's Long Form application requesting concurrent processing is provided in Attachment 1.

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The Attachment H requested changes are consistent with existing Department permit conditions; i.e., Condition C.12 of the Osprey Energy Center combined-cycle units and Condition B.12 for the Auburndale Peaker Energy Center simple cycle combustion turbine.

FDEP-3

The Auburndale and Calpine draft Title V air operation permits need to be issued/public noticed at the same time. Do you wish to share a combined public notice?

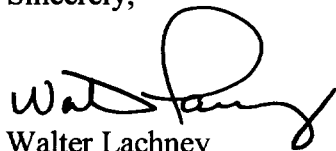
Response to FDEP-3

APP requests a separate public notice for the APP facility draft Title V/air construction permits.

As requested in your April 29, 2010 request for additional information, Attachment 1 contains a new certification statement by the authorized representative. Since this response is not of an engineering nature, a Professional Engineer certification is not required.

Your continued expeditious processing of the APP Title V/air construction permit application is appreciated. Please contact Steve Wunderlich, Plant Engineer, at (863) 965-1561 or by email at swunderlich@caithnessenergy.com, or myself at (863) 965-1561 or by email at wlachney@caithnessenergy.com if you have any further questions.

Sincerely,



Walter Lachney
Plant Manager

Attachments

cc: Mr. Nedin Bahtic, FDEP Southwest District Office
Ms. Katy Forney, US EPA Region 4
Ms. Ana Oquendo, US EPA Region 4
Mr. Thomas W. Davis, P.E., ECT
Mr. Steven Wunderlich, Caithness Energy
Mr. Tom Grace, Caithness Energy
Mr. Kevin Collins, Caithness Energy
Mr. Jim Miller, Caithness Energy

ATTACHMENT 1

REVISED PURPOSE OF APPLICATION

APPLICATION RESPONSIBLE OFFICIAL

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- ☐ Air construction permit.
- ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- ☐ Initial Title V air operation permit.
- ☐ Title V air operation permit
- ☐ Title V air operation permit renewal.
- ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- ☐ Air construction permit and Title V permit revision, incorporating the proposed project.
- ☒ Air construction permit and Title V permit, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- ☒ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Operation of the APP facility is currently authorized by Florida Department of Environmental Protection (FDEP) Title V Air Operation Permit No. 1050221-014-AV issued with an effective date of January 1, 2008, and an expiration date of December 31, 2012. This permit authorizes operation of the Auburndale Energy Complex (AEC) which also includes the Auburndale Peak Energy Center (APEC) simple cycle combustion turbine and the Osprey Energy Center (OEC) two combined cycle combustion turbine electrical generation facilities.

As part of its agreement to separate the Auburndale Energy Complex (AEC) into two facilities for Title V permitting purposes, FDEP requested the submittal of a Title V air operation permit application for each AEC facility. This application form and supplemental facility and emission unit information constitutes the Auburndale Power Partners, LP Title V and underlying air construction permit revision application for the APP facility.

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:

Walter Lachney, Plant Manager

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

- ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.
- ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
- ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
- ☒ The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.

3. Application Responsible Official Mailing Address:

Organization/Firm: **Auburndale Power Partners, LP**

Street Address: **1501 West Derby Avenue**

City: **Auburndale**

State: **Florida**

Zip Code: **33823-4062**

4. Application Responsible Official Telephone Numbers...

Telephone: **(863) 965-1561** ext. Fax: **(863) 965-1924**

5. Application Responsible Official E-mail Address:

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.


Signature

5-10-10
Date