



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

July 7, 2010

Electronically Sent – Received Receipt Requested.

Mr. Walter Lachney, Plant Manager (wlachney@caithnessenergy.com)
Auburndale Power Partners, L.P.
1501 West Derby Avenue
Auburndale, Florida 33823-4062

Re: Permits No. 1050221-016-AV and 1050221-017-AC
Title V Air Operation Permit Renewal and Air Construction Permit Modification
Request for Additional Information

Dear Mr. Lachney:

We received your response to our recent request for additional information letter concerning your application for a Title V Air Operation Permit Revision (please note, however, that we will be processing the permit as a renewal to even out future work load) for the Auburndale Power Partners facility. However, we must deem your application still *incomplete*, because we need further information relative to the following items:

- We note that you have requested the following provision be added to the permit language addressing excess emissions: "During cold start-up to combined cycle operation, up to three hours of excess emissions are allowed." Please provide operational historical data justifying the need for expanding the existing two hour limit to three hours.
- In addition, you have requested the following language be added to the excess emissions condition: "Periods of data excluded for startup and shutdown shall not exceed two hours in any block 24-hour period. Periods of data excluded for malfunctions shall not exceed two hours in any 24-hour block period. All periods of data excluded for any startup, shutdown or malfunction episode shall be consecutive for each episode. Periods of data excluded for all startup, shutdown or malfunction episodes shall not exceed four hours in any 24-hour block period." Again, please provide operational historical data justifying the need for these changes to the excess emissions condition.

When we receive this information, we will continue processing your application. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Mr. Walter Lachney, Plant Manager
Auburndale Power Partners, L.P.
Page 2 of 2

Sincerely,



Jonathan K. Holtom, P.E., CPM
Program Administrator
Title V Section

Cc: Ms. Mara Nasca, Southwest District Office: mara.nasca@dep.state.fl.us
Mr. Thomas W. Davis, P.E., Environmental Consulting and Technology, Inc.: tdavis@ectinc.com
Ms. Katy Forney, US EPA Region 4: forney.kathleen@epa.gov
Ms. Ana Oquendo, US EPA Region 4: oquendo.ana@epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, July 08, 2010 8:16 AM
To: 'wachney@caithnessenergy.com'
Cc: Nasca, Mara; 'tdavis@ectinc.com'; 'forney.kathleen@epa.gov'; 'oquendo.ana@epa.gov'; Friday, Barbara; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan; Walker, Elizabeth (AIR)
Subject: RAI: Auburndale Power Partners, L.P. - Auburndale Energy Complex (1050221-016-AV & 1050221-017-AC)
Attachments: RAI 1050221-016-AV_017-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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 of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/488-0114
sylvia.livingston@dep.state.fl.us

Tracking:

Livingston, Sylvia

From: Walter Lachney [wlachney@caithnessenergy.com]
Sent: Thursday, July 08, 2010 9:06 AM
To: Livingston, Sylvia
Cc: Thomas Grace; Steve Wunderlich; James Miller; Kevin Collins
Subject: RE: Auburndale Power Partners, L.P. - Auburndale Energy Complex (1050221-016-AV & 1050221-017-AC)

Sylvia

I did received the document.

Thank you

Walter Lachney
Site Manager
Auburndale Power Partners LP
1501 W. Derby Ave
Auburndale, FL 33823
Office 863-965-1561 ext 227
Mobile 863-255-7533

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, July 08, 2010 8:16 AM
To: Walter Lachney
Cc: Nasca, Mara; tdavis@ectinc.com; forney.kathleen@epa.gov; oquendo.ana@epa.gov; Friday, Barbara; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan; Walker, Elizabeth (AIR)
Subject: RAI: Auburndale Power Partners, L.P. - Auburndale Energy Complex (1050221-016-AV & 1050221-017-AC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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 of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston

Livingston, Sylvia

From: Tom Davis [tdavis@ectinc.com]
Sent: Thursday, July 08, 2010 8:51 AM
To: Livingston, Sylvia
Subject: RE: Auburndale Power Partners, L.P. - Auburndale Energy Complex (1050221-016-AV & 1050221-017-AC)

Sylvia,

I have received and can view the document provided in your email below.

Thanks.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, July 08, 2010 8:16 AM
To: wlachney@caithnessenergy.com
Cc: Nasca, Mara; tdavis@ectinc.com; forney.kathleen@epa.gov; oquendo.ana@epa.gov; Friday, Barbara; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan; Walker, Elizabeth (AIR)
Subject: RAI: Auburndale Power Partners, L.P. - Auburndale Energy Complex (1050221-016-AV & 1050221-017-AC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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 of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/488-0114
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.