

July 21, 2010

Mr. Jonathan Holtam, P.E.
Program Administrator Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400
(850-921-9526)

RECEIVED
JUL 23 2010
BUREAU OF
AIR REGULATION

RE: Auburndale Power Partners; Permits 1050221-016-AV and 1050221-017-AC;
Response to the Department's July 7, 2010 Title V Operation Permit Renewal and
Air Construction Permit Modification Request for Additional Information

Dear Mr. Holtam:

This letter is in response to your letter dated July 7, 2010 to Walter Lachney, Plant Manager, Auburndale Power Partners (APP), in which you request additional information in order to complete the permit separation process between this facility and the two Calpine entities and issue new Title V permits to each.

In your letter, it was requested that APP provide operational data to justify change in current language for the need to 1. Expand the existing two hour limit to three hours for cold start-up to combined cycle operation, and 2. Add language concerning "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 and malfunction episodes shall not exceed four hours in any 24-hour block period."

As discussed last week with Tom Cascio, it was APP's belief that with similar language being used in the current Title V permit, under sections B. 12 and C.12, for the Peaking Unit and the Osprey facility, it would be allowed in Section A for the APP facility. Under the current permit requirements, APP is not allowed to operate using these two monitoring/reporting methodologies; therefore it would be difficult to provide the Department with any operational history to justify need. Due to the need to expedite the permit separation, at this time, please exclude these two items for the current permitting effort and continue to proceed with finalizing the issuance of the two new permits. We will address both of these points as a separate matter once the new permit is issued.

If possible, could you provide us with a time line for finalizing the Title V permit separation between APP and the Calpine entities? If there are any questions or comments concerning the matters discussed in this letter, please feel free to either call or e-mail me.

For Auburndale Power Partners
Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas A. Grace', with a stylized flourish at the end.

Thomas A. Grace
Director – Environmental, Health & Safety

W/attachment (07/07/210 ltr. from J. Holtom)

Cc: Tom Cascio
Florida Department of Environmental Protection
BAR
2600 Blair Stone Road
Tallahassee, FL 32399-2400
(850-921-9526)

K. Collins
W. Lachney
S. Wunderlich



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charles E. Scott
Governor

Jeffrey B. Thompson
Deputy Governor

Michael A. Smith
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.
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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)