


Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief
Bureau of Air Regulation

THROUGH  Jeff Koerner, Air Permitting North Program

FROM: Bruce Thomas, Air Permitting North Program

DATE: October 8, 2007

SUBJECT: Air Permit No. 1050221-013-AV
Auburndale Power Partners
Title V Air Operation Permit Renewal

Attached for your review are the following items:

- Cover letter with Written Notice of Intent;
- Public Notice of Intent;
- Statement of Basis;
- Draft Permit with Appendices; and
- PE Certification

This is a renewal of the Title V air operation permit for the existing facility. There are no air construction permits to incorporate or revise. The format has been updated. I recommend your approval of the attached Draft Permit for this project.

Attachments

JFK/bxt

P.E. CERTIFICATION STATEMENT

APPLICANT

Calpine Corporation
717 Texas Avenue, Suite 1000
Houston, TX 77002

Project No. 1050221-013-AV
Title V Renewal
Auburndale Energy Complex
Polk County, Florida

PROJECT DESCRIPTION

The entire facility is known as the Auburndale Energy Complex, which consists of two locations, three plants and three owners:

Location: 1501 Derby Avenue, Auburndale, Florida
Auburndale Power Plant owned by the Auburndale Power Partners, L.P.
Auburndale Peak Energy Center owned by the Auburndale Peaker Energy Center, LLC.

Location: 1651 Derby Avenue, Auburndale, Florida
Osprey Energy Center owned by the Calpine Construction Finance Company, L.P.

Calpine Operating Services Company, Inc. operates all of the units at the plants. The nominal generating capacity of the plant is 816 megawatts (MW).

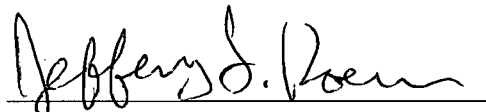
The Auburndale Power Plant consists of a nominal 156 MW combined cycle unit, fuel oil storage tanks, emergency generators, heating units and engines, and surface coating operations. The Auburndale Peak Energy Center consists of a nominal 120 MW simple cycle combustion turbine-electrical generator set. The Osprey Energy Center includes a nominal 540 MW combined cycle unit consisting of two combustion turbines, two HRSG with duct burner systems, one shared nominal 200 MW steam-electrical generator set and a cooling tower. The facility also operates other miscellaneous unregulated and insignificant emissions units and activities.

The facility is subject to the following primary regulatory classifications.

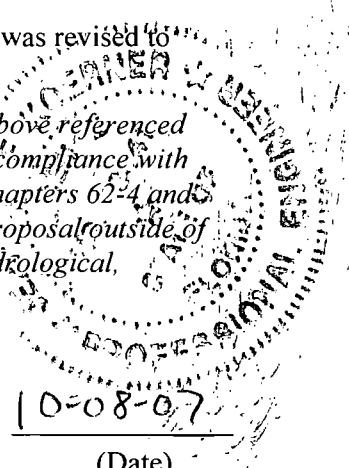
- The facility is a Title V major source in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source pursuant to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD).
- The facility operates units subject to Phase II of the federal Acid Rain Program.
- The facility is subject to power plant site certification.
- The facility is not a major source of hazardous air pollutants.

There are no new or revised air construction permits to incorporate. Only the permit format was revised to include updated and revised rules and regulations.

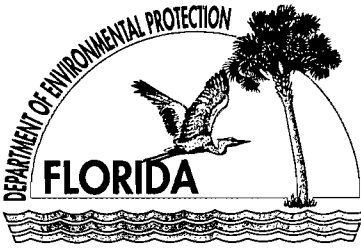
I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration No. 49441



10-08-07
(Date)



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

October 9, 2007

Sent Electronically – Received Receipt Requested

Mr. Jason Goodwin, Director of Environmental Health and Safety
Calpine Corporation
717 Texas Avenue, Suite 100
Houston, Texas 77002

Re: Project No. 1050221-013-AV
Title V Air Operation Permit Renewal
Auburndale Energy Complex

Dear Mr. Goodwin:

One copy of the draft Title V air operation permit renewal is enclosed for the Auburndale Energy Complex in Polk County, Florida. The Bureau of Air Regulation's Intent to Issue an Air Permit and the Public Notice of Intent to Issue an Air Permit are also included. An electronic version of the draft Title V air operation permit renewal has been posted on the Division of Air Resource Management's World Wide Web site for review by the Region 4 Office of the U.S. Environmental Protection Agency. The web site address is:

"<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>"

The Public Notice of Intent to Issue a Title V Air Operation Permit Renewal must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within seven days of publication pursuant to Rule 62-110.106(5), Florida Administrative Code (F.A.C.). Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to the Program Administrator at the above letterhead address. If you have any other questions, please contact project engineer Bruce Thomas, at 850/488-0114.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/bxt

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR PERMIT

*In the Matter of an
Application for Permit by:*

Calpine Corporation
717 Texas Avenue, Suite 100
Houston, Texas 77002

Draft Permit No. 1050221-013-AV
Title V Air Operation Permit Renewal
Auburndale Energy Complex
Polk County, Florida

Responsible Official: Mr. Jason Goodwin, Director
Environmental Health and Safety

Facility Location: The Calpine Corporation operates the existing Auburndale Energy Complex, which is located in Polk County at 1501 and 1651 Derby Avenue, Auburndale, Florida.

Project: On July 5, 2007, Calpine Corporation applied for a renewal of the Title V air operation permit for the Auburndale Energy Complex, which consists of three power plants. The Auburndale Power Plant consists of a nominal 156 MW combined cycle unit, fuel oil storage tanks, emergency generators, heating units and engines, and surface coating operations. The Auburndale Peak Energy Center consists of a nominal 120 MW simple cycle combustion turbine-electrical generator set. The Osprey Energy Center includes a nominal 540 MW combined cycle unit consisting of two combustion turbines, two HRSG with duct burner systems, one shared nominal 200 MW steam-electrical generator set and a cooling tower. The combustion turbine units are subject to the federal Acid Rain Program. The facility also operates other miscellaneous unregulated and insignificant emissions units and activities.

Permitting Authority: The application for a Title V Permit is subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-212, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114; and, the facsimile number is 850/921-9533.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the draft Title V air operation permit (Draft Permit), the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the Draft Permit by visiting the following website <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Proposed Permit and subsequent Final Permit in accordance with the conditions of the Draft Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue an Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the address or phone number listed above. Pursuant to Rules 62-110.106(5) & (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the Draft Permit for a period of 30 days from the date of publication of the Public Notice of Intent to Issue a Title V Air Operation Permit Renewal. Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at the above address or facsimile. As part of his or her comments, any person

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR PERMIT

may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (<http://faw.dos.state.fl.us/>) and in a newspaper of general circulation in the area affected by the permitting action. *Subsequent action on the Title V and Title IV parts of the Draft Permit renewal may be split if comments are received on the Title V portion of the Draft Permit.* For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority shall issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue A Title V Air Operation Permit Renewal. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue A Title V Air Operation Permit Renewal, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 when and how each 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 petition must so state; (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 decision; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue a Title V Air Operation Permit Renewal. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

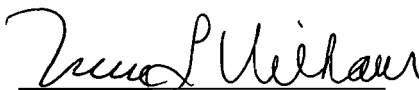
Mediation: Mediation is not available in this proceeding.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30 day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C.

WRITTEN NOTICE OF INTENT TO ISSUE AN AIR PERMIT

20460. For more information regarding objections, visit EPA's Region 4 web site at:
<http://epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue An Air Permit package (including the Public Notice and Draft Permit) was sent electronically with received receipt requested before the close of business on 10/11/07 to the persons listed below.

Mr. Jason Goodwin, Calpine Corporation (jgoodwin@calpine.com)

Ms. Heidi Whidden, Calpine Corporation (hwhidden@calpine.com)

Mr. Thomas Davis, ECT (tdavis@ectinc.com)

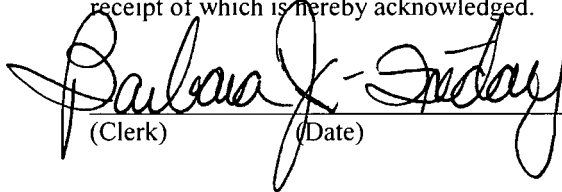
Ms. Cindy Zhang-Torres, Southwest District Office (Cindy.Zhang-Torres@dep.state.fl.us)

Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

Posted for EPA Region 4 Review

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to Section 120.52(7), F.S., with the designated agency Clerk,
receipt of which is hereby acknowledged.


(Clerk)

(Date)

10/11/07

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR PERMIT

Department of Environmental Protection
Draft Permit No. 1050221-013-AV
Auburndale Energy Complex
Polk County, Florida

Applicant: The applicant for this project is the Calpine Corporation for the Auburndale Energy Complex. The applicant's responsible official is Mr. Jason Goodwin, Director of Environmental Health and Safety, Calpine Corporation, 717 Texas Avenue, Suite 100, Houston, Texas 77002.

Location: The Calpine Corporation operates the existing Auburndale Energy Complex, which is located in Polk County at 1501 and 1651 Derby Avenue, Auburndale, Florida.

Project: On July 5, 2007, Calpine Corporation applied for a renewal of the Title V air operation permit for the Auburndale Energy Complex, which consists of three power plants. The Auburndale Power Plant consists of a nominal 156 MW combined cycle unit, fuel oil storage tanks, emergency generators, heating units and engines, and surface coating operations. The Auburndale Peak Energy Center consists of a nominal 120 MW simple cycle combustion turbine-electrical generator set. The Osprey Energy Center includes a nominal 540 MW combined cycle unit consisting of two combustion turbines, two HRSG with duct burner systems, one shared nominal 200 MW steam-electrical generator set and a cooling tower. The combustion turbine units are subject to the federal Acid Rain Program. The facility also operates other miscellaneous unregulated and insignificant emissions units and activities.

Permitting Authority: The application for a Title V Permit is subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-212, 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Bureau of Air Regulation's physical address is 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 and the mailing address is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Bureau of Air Regulation's phone number is 850/488-0114 and the facsimile number is 850/921-9533.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the draft Title V air operation permit (Draft Permit), the Statement of Basis, the application and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the Draft Permit by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue a Permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Proposed Permit and subsequent Final Permit in accordance with the conditions of the Draft Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the Draft Permit for a period of 30 days from the date of publication of this Public Notice of Intent to Issue an Air Permit (Public Notice). Written comments must be post-marked and all facsimile comments must be received by the Permitting Authority before the close of business (5:00 p.m.), on or before the end of this 30-day period, at the above address or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (<http://faw.dos.state.fl.us/>) and in a newspaper of general circulation in the area affected by the permitting action. *Subsequent action on the Title V and Title IV parts of the Draft Permit renewal may be split if comments are received on the Title V portion of the Draft Permit.* For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority shall issue a revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR PERMIT

3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 when and how each 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 petition must so state; (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 decision; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

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

Mediation: Mediation is not available in this proceeding.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30 day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit EPA's Region 4 web site at: <http://epa.gov/region4/air/permits/Florida.htm>.

STATEMENT OF BASIS

Project Information

Draft Permit No. 1050221-013-AV
Title V Air Operation Permit Renewal

Auburndale Energy Complex
Facility ID No. 1050221

The entire facility is known as the Auburndale Energy Complex, which consists of two locations, three plants and three owners:

Location: 1501 Derby Avenue, Auburndale, Florida
Auburndale Power Plant owned by the Auburndale Power Partners, L.P.
Auburndale Peak Energy Center owned by the Auburndale Peaker Energy Center, LLC.

Location: 1651 Derby Avenue, Auburndale, Florida
Osprey Energy Center owned by the Calpine Construction Finance Company, L.P.

Calpine Operating Services Company, Inc. operates all of the units at the plants. The nominal generating capacity of the plant is 816 megawatts (MW).

Facility Description

The Auburndale Energy Complex consists of the following emissions units:

EU No.	Brief Description
Auburndale Power Plant	
001	Nominal 156 MW combined cycle unit consisting of a nominal 121 MW combustion turbine-electrical generator set, an unfired heat recovery steam generator (HRSG) and a nominal 35 MW steam-electrical generator set.
002	Fuel oil storage tanks
003	Emergency generators
004	Heating units and engines
005	Surface coating operations
Auburndale Peak Energy Center	
006	Nominal 120 MW simple cycle combustion turbine-electrical generator set
Osprey Energy Center	
007	Nominal 170 MW combustion turbine-electrical generator set; part of a combined cycle unit*
008	Nominal 170 MW combustion turbine-electrical generator set; part of a combined cycle unit*
009	HRSG equipped with 250 MMBtu per hour duct burner system; part of a combined cycle unit*
010	HRSG equipped with 250 MMBtu per hour duct burner system; part of a combined cycle unit*
011	Cooling tower; part of a combined cycle unit*

* Emissions Units 007 – 011 comprise a nominal 540 MW combined cycle unit consisting of two combustion turbines, two HRSG with duct burner systems, and one shared nominal 200 MW steam-electrical generator set. The facility also operates other miscellaneous unregulated and insignificant emissions units and activities.

STATEMENT OF BASIS

Regulatory Classifications

The facility is subject to the following primary regulatory classifications and applicable state regulations of the Florida Administrative Code (F.A.C.) as well as the federal New Source Performance Standards (NSPS) in the Code of Federal Regulations (CFR).

- The facility is a Title V major source in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source pursuant to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD).
- The facility operates units subject to Phase II of the federal Acid Rain Program.
- The facility is subject to power plant site certification.
- The facility is not a major source of hazardous air pollutants.
- The four combustion turbines are regulated under the NSPS Subpart A (General Provisions) and Subpart GG (Standards of Performance for Stationary Gas Turbines) in 40 CFR 60.
- The two HRSG with duct burner systems are subject to NSPS Subpart A (General Provisions) and Subpart Da (Standards of Performance for Electric Utility Steam Generating Units) in 40 CFR 60.
- Although the combustion turbines use add-on wet injection systems to control nitrogen oxide (NO_x) emissions when firing oil, Compliance Assurance Monitoring (CAM) plans are not required because each unit demonstrates compliance with the NO_x standards by data collected from the continuous emissions monitoring systems.

Also included in this permit are miscellaneous unregulated and insignificant activities.

Permit Format

Several permit conditions have been moved or consolidated as follows:

- General permit conditions from Rule 62-4.160, F.A.C. are now listed in Appendices B (General Conditions).
- Common regulatory requirements that are generally applicable to all emissions units and activities (e.g., compliance testing requirements) are provided in Appendix C (Common Conditions).
- The latest version of the NSPS Subpart A, General Provisions, is consolidated in Appendix D.
- The latest version of the NSPS Subpart Da, Standards of Performance for Electric Utility Steam Generating Units, is consolidated in Appendix E.
- The latest version of the NSPS Subpart GG, Standards of Performance for Stationary Gas Turbines, is consolidated in Appendix F.

Conclusion

Based on reasonable assurances of compliance provided by the applicant and the Responsible Official's certification of compliance, the Department will issue the Title V air operation permit under the provisions of Chapter 403, Florida Statutes (F.S.) and F.A.C. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296 and 62-297. The permit authorizes operation of the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Title V Air Operation Permit Renewal
Draft Permit No. 1050221-013-AV**

Facility

Auburndale Energy Complex
Facility ID No. 1050221
Polk County, Florida

Permittee

Calpine Construction Finance Company, L.P.
Auburndale Peaker Energy Center, LLC
Auburndale Power Partners, L.P.

Permitting Authority

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/921-9533

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Permittee:

Calpine Corporation
717 Texas Avenue, Suite 1000
Houston, TX 77002

Permit No. 1050221-013-AV
Auburndale Energy Complex
Facility ID No. 1050221
Title V Air Operation Permit

Responsible Official:

Mr. Jason M. Goodwin
Director of Environmental Health & Safety

This permit renews the Title V air operation permit for the Auburndale Energy Complex, which is an existing power plant (SIC No. 4911). The entire facility is known as the Auburndale Energy Complex and consists of two locations, three plants and three owners as follows:

Location: 1501 Derby Avenue, Auburndale, Florida
Auburndale Power Plant owned by the Auburndale Power Partners, L.P.
Auburndale Peak Energy Center owned by the Auburndale Peaker Energy Center, LLC.

Location: 1651 Derby Avenue, Auburndale, Florida
Osprey Energy Center owned by the Calpine Construction Finance Company, L.P.

Calpine Operating Services Company, Inc. operates all of the units at these plants. The nominal generating capacity of the plant is 816 megawatts (MW). The reference UTM Coordinates are Zone 17, 420.8 km East and 3103.3 km North.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittees are hereby authorized to operate the plants in accordance with the terms and conditions of this permit as well as the application, approved drawings, plans, and other documents, attached hereto or on file with the permitting authority.

Effective Date: January 1, 2008

Renewal Application Due Date: July 1, 2012

Expiration Date: December 31, 2012

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Calpine Operating Services Company, Inc. operates three existing power plants that comprise the Auburndale Energy Complex. The plants consist of a combination of simple cycle and combined cycle combustion turbines. The nominal generating capacity of the Auburndale Energy Complex is 816 megawatts (MW).

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility operates units subject to Phase II of the federal Acid Rain Program.
- The facility is a Title V major source in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source pursuant to Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD).
- The facility is subject to power plant site certification.

Subsection B. Summary of Emissions Units.

The Auburndale Energy Complex consists of the following emissions units:

EU No.	R/U ^a	Brief Description
Auburndale Power Plant		
001	R	Nominal 156 MW combined cycle unit consisting of a combustion turbine-electrical generator set rated at 121.5 MW, an unfired heat recovery steam generator (HRSG) and a nominal 52 MW steam turbine-electrical generator set.
002	U	Fuel oil storage tanks
003	U	Emergency generators
004	U	Heating units and engines
005	U	Surface coating operations
Auburndale Peak Energy Center		
006	R	Nominal 120 MW simple cycle combustion turbine-electrical generator set
Osprey Energy Center		
007	R	Nominal 170 MW combined cycle combustion turbine-electrical generator set ^b
008	R	Nominal 170 MW combined cycle combustion turbine-electrical generator set ^b
009	R	HRSG equipped with 250 MMBtu per hour gas-fired duct burner system ^b
010	R	HRSG equipped with 250 MMBtu per hour gas-fired duct burner system ^b
011	U	Cooling tower

- “R” means regulated and “U” means unregulated.
- Emissions Units 007 – 011 comprise a nominal 540 MW combined cycle unit consisting of two combustion turbines, two HRSG with duct burner systems, and one shared nominal 200 MW steam-electrical generator set.

The facility also operates other miscellaneous unregulated and insignificant emissions units and activities. The four combustion turbines are subject to: Phase II of the federal Acid Rain Program; the New Source Performance Standards (NSPS) in Subpart A (General Provisions) of 40 CFR 60; and NSPS Subpart GG (Standards of Performance for Stationary Gas Turbines) in 40 CFR 60. The two HRSG equipped with duct burners are subject to NSPS Subpart Da (Standards of Performance for Electric Utility Steam Generating Units) in 40 CFR 60.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit ID Nos. on all correspondence, test report submittals, applications, etc.

SECTION 2. FACILITY-WIDE CONDITIONS

The following conditions apply facility-wide.

1. Appendices. The Appendices identified in the Table of Contents and attached to this permit are an enforceable part of the permit unless otherwise indicated.
2. Effective Date. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]
3. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2, F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. *{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2 & 3, F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]}*
4. EPA. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency (EPA) should be sent to: United States Environmental Protection Agency, Region 4, Air, Pesticides & Toxics Management Division, Air and EPCRA Enforcement Branch, Air Enforcement Section, 61 Forsyth Street, Atlanta, Georgia 30303-8960. The telephone number is 404/562-9155 and facsimile number is 404/562-9163.
5. Compliance Authority. The permittee shall submit all compliance related notifications and reports required of this permit to the Southwest District Office of the Florida Department of Environmental Protection (Department) at 13051 N. Telecom Parkway, Temple Terrace, Florida 33637. The telephone number is 813/632-7600 and facsimile number is 813/632-7665.
6. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]
7. Source Obligation. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12)(b), F.A.C.]
8. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(3), F.A.C.]
9. Records Retention. All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection A. Combined Cycle Combustion Turbine

This section addresses the following emissions unit.

EU No.	Brief Description
Auburndale Power Plant	
001	Nominal 156 MW combined cycle unit consisting of a combustion turbine-electrical generator set rated at 121.5 MW, an unfired heat recovery steam generator (HRSG) and a steam turbine-electrical generator set rated at 52 MW. NO _x emissions are controlled by steam injection and selective catalytic reduction (SCR) systems.

{Permitting Note: This emissions unit is regulated under: Acid Rain, Phase II; NSPS Subpart A (General Provisions) and NSPS Subpart GG (Stationary Gas Turbines) in 40 CFR 60; and Rule 212.400(PSD), F.A.C.}

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

A.1 Authorized Fuels. Only natural gas or distillate oil with a maximum sulfur content of 0.05% by weight shall be fired in the combustion turbine. [Rule 62-210.200(PTE), F.A.C. and PSD-FL-185]

A.2 Permitted Capacity. Based on the lower heating value (LHV) of each fuel and International Standards Organization (ISO) conditions, the maximum heat input rate to the combustion turbine is 1214 MMBtu/hour while firing natural gas and 1170 MMBtu/hour while firing distillate fuel oil. [Rule 62-210.200(PTE), F.A.C. and PSD-FL-185]

A.3 Hours of Operation. This emissions unit is allowed to operate continuously (8760 hours/year). The total hours of operation of the combustion turbine while firing distillate fuel oil shall not exceed 400 hours/year. [Rule 62-210.200(PTE), F.A.C. and PSD-FL-185]

A.4 Wet Compression System. Operation of the wet compression system is approved for use on Unit 1 during any periods at which the ambient temperature is above 60° F. Use of the wet compression system is limited to periods during the firing of natural gas only. [1050221-005-AC]

EMISSION LIMITATIONS AND STANDARDS

{Permitting Note: Unless otherwise specified, the averaging time for an emissions standard is based on the specified averaging time of the applicable test method.}

A.5 VE Standards. Visible emissions from the combustion turbine shall not exceed 10% opacity at full load and 20% opacity at loads other than full load. [Rule 62-212.400(PSD), F.A.C. and PSD-FL-185]

A.6 PM₁₀ Standards. PM₁₀ emissions shall not exceed the following:

- Natural Gas:* 0.0134 lb/MMBtu; 10.5 lb/hour; and 46 tons/year.
- Distillate Oil:* 0.0472 lb/MMBtu; 36.8 lb/hour; and 7.4 tons/year.

[Rule 62-212.400(PSD), F.A.C. and PSD-FL-185]

A.7 SO₂ Standards. SO₂ emissions shall not exceed the following:

- Natural Gas:* 40.0 lb/hour; and 175.2 tons/year.
- Distillate Oil:* use of distillate oil with a maximum sulfur content of 0.05 % by weight; 70.0 lb/hour; and 14 tons/year.

[Rule 62-212.400(PSD), F.A.C. and PSD-FL-185]

A.8 NO_x Standards. NO_x emissions shall not exceed the following:

- Natural Gas:* 15 ppmvd corrected to 15% oxygen based on a 24-hour block average as defined below; 9 ppmvd corrected to 15% oxygen based on a 12-month rolling average as defined below; 78.6 lb/hour; and 177 tons/year based on a 12-month rolling total for the combined total of natural gas and distillate fuel oil

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection A. Combined Cycle Combustion Turbine

firing.

- b. *Distillate Oil*: 42 ppmvd corrected to 15% oxygen based on a 24-hour block average; 230.0 lb/hour; 46 tons/year; and 177 tons/year based on a 12-month rolling total for the combined total of natural gas and distillate fuel oil firing.
- c. *Calculation of 24-hour Block Averages*: At the same time each day, a 24-hour block average shall be calculated for the monitored operating hours in the previous 24-hour period. The 24-hour block average shall be determined by summing the hourly average NO_x concentrations for all valid monitored operating hours and dividing by the number of hourly average NO_x concentrations in the previous 24-hour period. A monitored operating hour is each hour in which fuel is fired in the combustion turbine and at least two CEMS emission measurements are recorded at least 15 minutes apart. The CEMS data taken during periods of startup, shutdown, or malfunction as defined in Rules 62-210.200 and 62-210.700 F.A.C., when fuel is not fired in the unit, or during CEMS quality assurance checks or when the CEMS is out of control, shall be excluded from the 24-hour block average.
- d. *Calculation of 12-Month Rolling Totals*: For the annual (tons/year) emissions limits of NO_x, measurements shall be in pounds (converted to tons) and be based on a 12-month rolling total starting at the first day of each calendar month. Each monthly total shall be calculated by adding the pounds per day for each valid operating day (all fuels) within the calendar month. This monthly total shall be combined with the emissions from the previous valid 11 calendar months and shall comprise a 12-month rolling total.
- e. *Calculation of the 12-Month Rolling NO_x Average*: To demonstrate compliance with the NO_x limit of 9 ppmvd corrected to 15% oxygen based on a 12-month rolling average, measurements shall be in "ppmvd corrected to 15% oxygen" and be based on a 12-month rolling average starting at the first day of each calendar month. Each monthly average shall be calculated by adding each valid gas firing 24-hour block average (as determined above) from valid operating days within the calendar month. This monthly average shall be combined with the emissions from the previous valid 11 calendar months and shall comprise a 12-month rolling average. In order to convert each 12-month rolling average to an annual equivalent limit, the following formula shall be utilized:

$$\text{ppmvd}_e = (\text{ppmvd}_a) (\text{hours}_g / 8760)$$

Where:

ppmvd_e = the equivalent annual NO_x average (ppmvd corrected to 15% oxygen)

ppmvd_a = the measured (CEMS) 12-month rolling NO_x average (ppmvd corrected to 15% oxygen) for firing only natural gas

hours_g = 12-month rolling total valid hours of operation combusting natural gas

[Rule 62-212.400(PSD), F.A.C., PSD-FL-185, 1050221-004-AC, and 1050221-010-AC]

A.9 VOC Standards. VOC emissions shall not exceed the following:

- a. *Natural Gas*: 6.0 lb/hour; and 26.3 tons/year.
- b. *Distillate Oil*: 10.0 lb/hour; and 2.0 tons/year.

[Rule 62-212.400(PSD), F.A.C. and PSD-FL-185]

A.10 CO Standards. CO emissions shall not exceed the following:

- a. *Natural Gas*: 21 ppmvd at minimum load; 15 ppmvd at base load; 43.5 lb/hour; and 190.5 tons/year.
- b. *Distillate Oil*: 25 ppmvd; 73.0 lb/hour; and 14.6 tons/year.

[Rule 62-212.400(PSD), F.A.C. and PSD-FL-185]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection A. Combined Cycle Combustion Turbine

EXCESS EMISSIONS

A.11 Excess Emissions. Excess emissions from this emissions unit resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Additionally, the permittee's record keeping for the NO_x emissions caps (TPY) on EU-001 and EU-006 shall be in full agreement with publicly available data on EPA's Acid Rain website which includes all documented exclusions reported to the Department in a quarterly report. However these emissions will be excluded for compliance demonstration. *{Permitting note: Rule 62-210.700(Excess Emissions), F.A.C. cannot vary any requirement of a NSPS or NESHAP provision.}* [Rule 62-210.700(1), F.A.C. and 1050221-010-AC]

COMPLIANCE TESTING

A.12 Testing Requirements. See Appendix C (Common Conditions) of this permit for notification, testing, record keeping and reporting requirements regarding compliance tests. [Chapter 62-297, F.A.C.]

A.13 Test Methods. As required, the following test methods shall be used to determine emissions.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Matter Emissions
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources
18	Measurement of Gaseous Organic Compound Emissions (Gas Chromatography) {Note: Optional testing in accordance with EPA Method 18 may be conducted to account for the actual methane fraction of the measured VOC emissions, if specifically requested.}
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates {Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.}
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A; 40 CFR 60.334; PSD-FL-185; 1050221-004-AC; and 1050221-010-AC]

A.14 Frequency of Compliance Tests: The permittee shall conduct tests on the combustion turbine system to demonstrate compliance with the applicable emissions standards in accordance with the following frequencies.

- Annual Tests:** During each federal fiscal year (October 1 - September 30), the permittee shall have a formal compliance test conducted for CO and visible emissions. If distillate is fired for more than 400 hours, an annual compliance test shall also be conducted for PM/PM₁₀ emissions while firing distillate oil.
- Tests Prior to Renewal:** The permittee shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standards prior to obtaining a renewed operation permit for CO and VOC. Compliance testing is only required during the combustion of natural gas fuel, which is the primary fuel. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. *{Permitting Note: Continuous*

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection A. Combined Cycle Combustion Turbine

compliance with the NO_x emissions standards is demonstrated with CEMS data.

- c. **Exceptions:** Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once in each 5-year period, coinciding with the term of its air operation permit.

[40 CFR 60.334, PSD-FL-185, 1050221-004-AC and 1050221-010-AC]

MONITORING REQUIREMENTS

A.15 Fuel Sulfur Monitoring. The permittee shall determine compliance with the sulfur content standard of 0.05% by weight as follows: ASTM D129-91, D1552-90, D2280-71, D2880-96, D2622-92, D4292, D4294-90, D5453, or the latest editions shall be used to determine the sulfur content of liquid fuels; and ASTM D1072-80/90/94, D3031-81/86, D3246-81/92, D4084-82/94, D4468-85, D5504-94, or the latest editions shall be used to determine the sulfur content of gaseous fuels. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator. [40 CFR 60.335 and PSD-FL-185]

A.16 NO_x CEMS. In accordance with Performance Specification 2 in Appendix B of 40 CFR 60, the permittee shall install, calibrate, maintain and operate a CEMS in the stack to measure and record the NO_x emissions from this unit to demonstrate compliance with the applicable emissions standards. Quality assurance procedures must conform to the applicable sections of Appendix F in 40 CFR 60.

- a. For purposes of demonstrating compliance with the NO_x mass emission limits (lb/hr and tons/year), NO_x and diluent concentrations shall be determined by one of the following methods: EPA Method 20 conducted between 90% and 100% of permitted maximum capacity only; continuous monitoring data collected during the relative accuracy test assessment conducted pursuant to Section 7 in Performance Specification 2 of Appendix B, 40 CFR 60; or EPA Method 7E with either EPA Method 3 or 3A in Appendix A of 40 CFR 60.
- b. The NO_x CEMS shall be used to demonstrate continuous compliance with the NO_x emission limit (24-hour block average concentration limit).

[Rule 62-212.400(PSD), F.A.C. and PSD-FL-185]

RECORD KEEPING AND REPORTING REQUIREMENTS

A.17 Fuel Records. Sulfur and lower heating value of the fuel being fired in the combustion turbine shall be based on a weighted 12-month rolling average from fuel delivery receipts. The records of distillate oil usage shall be kept by the permittee for a 5-year period. For SO₂, periods of excess emissions shall be reported if the fuel being fired exceeds 0.05% sulfur by weight. [Rules 62-212.400(PSD) and 62-213.440(1)(b), F.A.C.; and PSD-FL-185]

A.18 Common Conditions. See Appendix C of this permit for additional generic record keeping, reporting and notification requirements. [Chapters 62-4, 62-210, 62-296 and 62-297]

OTHER REQUIREMENTS

A.19 NSPS Provisions. The combustion turbine is subject to the applicable requirements of Subpart A (General Provisions) and Subpart GG (Stationary Gas Turbine) in 40 CFR 60. See Appendices D and F of this permit.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection B. Simple Cycle Combustion Turbine

This section addresses the following emissions units.

EU No.	Brief Description
Auburndale Peak Energy Center	
006	Nominal 120 MW simple cycle combustion turbine-electrical generator set consisting of a Siemens Westinghouse Model No. 501D5A unit. The primary fuel is natural gas and distillate oil is fired as a restricted alternate fuel. Water injection is used to control NO _x emissions. The simple cycle unit operates during periods of peak power demands and is expected to operate near permitted capacity for approximately 20% to 25% of the permitted hours.

{Permitting Note: This emissions unit is regulated under: Phase II of the federal Acid Rain Program; NSPS Subpart A (General Provisions) and NSPS Subpart GG (Stationary Gas Turbines) in 40 CFR 60; and Rule 212.400(PSD Avoidance), F.A.C.}

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

B.1 Permitted Capacity. The maximum heat input to the combustion turbine from firing natural gas shall not exceed 1591 MMBtu/hour based on the following: 100% base load, a higher heating value (HHV) for natural gas and a compressor inlet air temperature of 32° F. The maximum heat input to the combustion turbine from firing distillate oil shall not exceed 1546 MMBtu/hour based on the following: 100% base load and a compressor inlet air temperature of 32° F. Heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. [Design; Rule 62-210.200(PTE), F.A.C.; and 1050221-004-AC]

B.2 Authorized Fuels.

- a. The combustion turbine shall fire only natural gas with maximum sulfur content of 2 grains of sulfur per 100 dry standard feet of gas (monthly average) or distillate oil with a maximum sulfur content of 0.05% by weight. [Rules 62-210.200(PTE), F.A.C. and 1050221-004-AC]
- b. The combustion turbine shall fire no more than 2,227,400 MMBtu of natural gas during any consecutive 12-month period (equivalent to approximately 1400 hours/year at base load). The use of wet compression as an alternate means of evaporative cooling is authorized when firing natural gas. The total hours of operation of the combustion turbine while firing distillate fuel oil shall not exceed 400 hours during any consecutive 12-month period. The permittee shall install, calibrate, operate and maintain a monitoring system to measure and accumulate the following for each fuel fired: quantity, heat input rate and hours of operation. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 1050221-004-AC; and 1050221-006-AC]

B.3 Allowable Operation.

- a. The combustion turbine shall operate only in simple cycle mode not to exceed the permitted hours of operation, nor the permitted short and long-term emission limits allowed by this permit. This restriction is based on the permittee's request, which formed the basis of the PSD non-applicability determination and resulted in the emission standards specified in this permit. Specifically, these restrictions eliminated several control alternatives based on technical as well as regulatory considerations. For any request to modify this emission unit in any way (whether a physical or operational modification, including a change in the allowable hours of operation or heat input, or to alter any short or long-term emission) the permittee shall submit a full PSD permit application complete with a new proposal of the best available control technology as if the unit had never been built. Alternately, the permittee shall submit a determination of PSD applicability for proposed permit changes, which the Department shall consider in making its determination. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and 1050221-004-AC]
- b. The permittee is authorized to, tune, operate and maintain one new combustion turbine with electrical generator set (Siemens/Westinghouse Model 501D5A). The system shall be maintained and tuned in accordance with the manufacturer's recommendations to minimize permitted pollutant emissions. The unit is designed to produce a maximum 135 MW of electrical power. [Rule 62-212.400, F.A.C. (PSD Avoidance), 1050221-004-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection B. Simple Cycle Combustion Turbine

- c. The permittee shall calibrate, tune, operate, and maintain a water injection system for the unit. The system shall be designed and operated so as to ensure that NO_x emissions do not exceed 25.0 ppmvd corrected to 15% oxygen while burning natural gas and 42.0 ppmvd corrected to 15% oxygen when burning oil. [Rule 62-212.400, F.A.C. (PSD Avoidance), 1050221-004-AC]

EMISSION LIMITATIONS AND STANDARDS

- B.4** VE Standard. Visible emissions shall not be equal to or greater than 20% opacity. [Rule 62.296.320(4)(b)1, F.A.C. and 1050221-004-AC]
- B.5** PM/PM₁₀ Standards. Particulate matter emissions shall not exceed 2.9 lb/hour when firing natural gas and 58.5 lb/hour when firing distillate oil. [Rule 62-212.400(PSD Avoidance), F.A.C and 1050221-004-AC]
- B.6** SO₂ Standards. Sulfur dioxide emissions shall be controlled by the firing of: natural gas with a maximum sulfur content of 2 grains of sulfur per 100 dry standard feet of gas (monthly average); and distillate oil with a maximum sulfur content of 0.05% by weight and 74.9 lb/hour. [Rule 62-4.070(3), F.A.C. and 1050221-004-AC]
- B.7** NO_x Standards. Nitrogen oxides emissions shall not exceed: 25.0 ppmvd corrected to 15% oxygen based on a 24-hour block average when firing natural gas; 42.0 ppmvd corrected to 15% oxygen based on a 24-hour block average when firing distillate oil; and 115 tons/year based on a 12-month rolling total. Compliance with the NO_x BACT standard does not require correction to ISO conditions. [Rule 62-212.400 (PSD Avoidance), F.A.C. and 1050221-004-AC]
- B.8** VOC Standards. Volatile organic compound emissions shall not exceed 4.0 ppmvd corrected to 15% oxygen when firing natural gas and 5.0 ppmvd corrected to 15% oxygen firing distillate fuel oil. [Rule 62-4.070(3), F.A.C. and 1050221-004-AC]
- B.9** CO Standard. Carbon monoxide emissions shall not exceed: 10 ppmvd corrected to 15% oxygen at base load (24-hour average) and 99 tons/year based on a 12-month rolling total while burning all fuels. [Rule 62-212.400(PSD Avoidance), F.A.C. and 1050221-004-AC]

EXCESS EMISSIONS

{Permitting Note: Rule 62-210.700(Excess Emissions), F.A.C. cannot vary any requirement of a NSPS or NESHA provision.}

- B.10** Excess Emissions Allowed: Providing the permittee adheres to best operational practices to minimize the amount and duration of excess emissions, the following conditions shall apply:
- a. During startup and shutdown, visible emissions excluding water vapor may exceed 20% opacity for up to 2 hours in any 24-hour period.
 - b. During all startups, shutdowns, and malfunctions, the CEMS shall monitor and record emissions. Monitoring data exclusions shall be accordance with Condition B.11 of this permit.
 - c. In case of malfunctions, the permittee shall notify the Compliance Authorities within one working day. A full written report on the malfunctions shall be submitted in a quarterly report. [Rules 62-210.700(1),(5), 62-4.130, F.A.C. and 1050221-004-AC]

MONITORING REQUIREMENTS

- B.11** CMS for Water-to-Fuel Ratio. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG and using water injection to control NO_x emissions shall install and operate a continuous monitoring system (CMS) to monitor and record the fuel consumption and the ratio of water-to-fuel being fired in the turbine. This system shall be accurate to within ± 5.0 percent and shall be approved by the Administrator. This system shall be used as a backup to the required CEMS. [Rule 62-212.400(PSD), F.A.C. and 1050221-004-AC]
- B.12** CO and NO_x CEMS. The owner or operator shall calibrate, maintain, and operate a CEMS in the exhaust

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection B. Simple Cycle Combustion Turbine

stack of this emissions unit to measure and record the emissions of NO_x and CO from the emissions units, and the oxygen (O₂) content of the flue gas at the location where NO_x and CO are monitored, in a manner sufficient to demonstrate compliance with the emission limits of this permit. The CEMS shall be used to demonstrate compliance with the emission limits for NO_x and CO within this permit.

- a. The NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. The span for the lower range shall not be greater than 30 ppmvd corrected to 15% oxygen and the span for the upper range shall not be greater than 100 ppmvd corrected to 15% oxygen. Annual RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E in Appendix A of 40 CFR 60. The permittee shall conduct an annual RATA test at 100% output in accordance with the applicable CEMS requirements. The NO_x monitor shall be a dual range monitor.
- b. The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4. The O₂ monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 3. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of section 7 shall be made each calendar quarter, and reported semi-annually to the Compliance Authority. The RATA tests required for the CO monitor shall be performed using EPA Method 10, of Appendix A of 40 CFR 60. The Method 10 analysis shall be based on a continuous sampling train, and the ascarite trap may be omitted or the interference trap of section 10.1 may be used in lieu of the silica gel and ascarite traps. The span for the CO monitor shall not be greater than 100 ppmvd corrected to 15% oxygen. The RATA tests required for the oxygen monitor shall be performed using EPA Method 3B, of Appendix A of 40 CFR 60. The span for the oxygen monitor shall not be greater than 21%.
- c. For purposes of determining compliance with the NO_x emission limits based on a 24-hour block average, missing data shall not be substituted pursuant to 40 CFR 75. Instead the block average shall be determined using the remaining hourly data in the 24-hour block. However, the permittee's record keeping for the EU-006 NO_x emissions caps (tons/year) shall be in full agreement with data submitted for inclusion on EPA's Acid Rain website which includes all documented exclusions reported to the Department in a quarterly report. The permittee may exclude start up, shutdown, and Part 75 missing data from the ppmvd calculations. However, this data will need to be recorded for the tons/year calculations for netting purposes and as required by the Acid Rain website.
- d. The CO, NO_x and O₂ data shall be recorded by the CEMS during episodes of startup, shutdown and malfunction. No valid monitoring data shall be excluded from the mass-based (tons/year) CO and NO_x emissions limits. Monitoring data collected during startup, shutdown and malfunctions may be excluded in accordance with the following conditions when determining compliance with concentration-based (ppmvd) CO and NO_x emissions limits. CO and NO_x emissions data recorded during these episodes may be excluded from the 24-hour block average calculated to demonstrate compliance with the emission limits of this permit as provided in this paragraph. 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. The owner or operator shall minimize the duration of data excluded for startup, shutdown and malfunctions, to the extent practicable. Data recorded during startup, shutdown or malfunction events shall not be excluded if the startup, shutdown or malfunction episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented.
- e. The 24-hour block averages are calculated as follows: starting at midnight of each operating day, a 24-hour block average shall be calculated from 24 valid hourly average emission rate values. Each hourly value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit

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combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly value shall be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour). The owner or operator shall use all valid measurements or data points collected during an hour to calculate the hourly averages. All data points collected during an hour shall be, to the extent practicable, evenly spaced over the hour. If the CEMS measures concentration on a wet basis, the CEM system shall include provisions to determine the moisture content of the exhaust gas and an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Alternatively, the owner or operator may develop through manual stack test measurements a curve of moisture contents in the exhaust gas versus load for each allowable fuel, and use these typical values in an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Final results of the CEMS shall be expressed as ppmvd corrected to 15% oxygen. Monitoring data shall be excluded from the 24-hour block average for the following periods: startup, shutdown, or malfunction as defined in Rules 62-210.200 and 62-210.700, F.A.C.; when fuel is not fired in the unit; CEMS quality assurance checks; or when the CEMS is out of control.

f. For the annual (tons/year) emissions limits of CO and NO_x, measurements shall be in pounds (converted to tons) and be based on a 12-month rolling total starting at the first day of each calendar month. Each monthly total shall be calculated by adding the pounds per day for each valid operating day (all fuels) within the calendar month. This monthly total shall be combined with the emissions from the previous valid 11 calendar months and shall comprise a 12-month rolling total.

g. Subject to EPA approval, the following alternate monitoring may be used to demonstrate compliance. When requested by the Department, the CEMS emission rates for NO_x on this unit shall be corrected to ISO conditions to demonstrate compliance with the NO_x standard established in 40 CFR 60.332. Data collected from the NO_x CEMS shall be used to report excess emissions in accordance with 40 CFR 60.334(c)(1) of NSPS, Subpart GG.

[Rules 62-4.070(3) and 62-212.400(PSD), F.A.C.; 1050221-004-AC; Subparts B, C, F and G in 40 CFR Part 75; Appendix A, B and F of 40 CFR 60; Subparts A and GG in 40 CFR 60]

COMPLIANCE TESTING

B.13 Test Methods. As required, the following test methods shall be used to determine emissions.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
5	Determination of Particulate Matter Emissions
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources
18	Measurement of Gaseous Organic Compound Emissions (Gas Chromatography) {Note: Optional testing in accordance with EPA Method 18 may be conducted to account for the actual methane fraction of the measured VOC emissions, if specifically requested.}
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates {Note: Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.}
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A; 40 CFR 60.334; and 1050221-004-AC]

B.14 Frequency of Compliance Tests. The permittee shall conduct the following compliance tests:

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- a. *Annual Tests:* During each federal fiscal year (October 1 - September 30), the permittee shall have a formal compliance test conducted for CO, NO_x and visible emissions.
- b. *Tests Prior to Renewal:* Prior to renewing the air operation permit, the permittee shall conduct compliance tests for CO, NO_x, VOC, and visible emissions from the combustion turbine. These tests shall be conducted within the 12-month period prior to renewing the air operation permit. For pollutants that are required to be tested annually, the permittee may submit the most recent annual compliance test to satisfy the requirements of this provision. Compliance testing is only required during the combustion of natural gas fuel.
- c. *Tests After Substantial Modifications:* All performance tests required for initial startup shall also be conducted after any substantial modification and appropriate shakedown period of air pollution control equipment. Shakedown periods shall not exceed 100 days after re-starting the combustion turbine.
- d. If the unit does not combust natural gas for greater than 400 hours during the federal fiscal year, the annual compliance tests are not required. Annual RATA testing at 100% output may be utilized to satisfy the annual testing requirements for CO and NO_x. No other methods may be used for compliance testing without prior written approval from the Department.

[1050221-004-AC; 40 CFR 60.7 and 60.8; Rules 62-297.310(7)(a)4 and 9, F.A.C.]

B.15 Fuel Sulfur Monitoring. The permittee shall demonstrate compliance with the fuel sulfur limit for natural gas specified in this permit by maintaining records of the average sulfur content of the natural gas being supplied for each month of operation in accordance with the following methods: ASTM D1072-80/90/94; D3031-81/86; D3246-81/92; D4084-82/94; D4468-85; D5504-94; or the latest editions. The owner or operator shall determine compliance with the sulfur content standard of 0.05% by weight for distillate oil in accordance with the following methods: ASTM D129-91; D1552-90; D2280-71; D2880-96; D2622-92; D4292; D4294-90; or the latest editions. These methods shall be used to determine the sulfur content of the natural gas fired in accordance with any EPA-approved custom fuel monitoring schedule or natural gas supplier data or the natural gas sulfur content referenced in 40 CFR 75 Appendix D. The analysis may be performed by the permittee, a service contractor retained by the permittee, the fuel vendor, or any other qualified agency pursuant to 40 CFR 60.335. However, the permittee is responsible for ensuring that the procedures in 40 CFR 60.335 or 40 CFR 75 are used to determine the fuel sulfur content for compliance with the 40 CFR 60.333 SO₂ standard. [Rules 62-4.070(3) and 62-4.160(15); and 1050221-004-AC]

RECORD KEEPING AND REPORTING REQUIREMENTS

B.16 Records of CO and NO_x Caps. Annual (12-month rolling total) NO_x and CO limits shall be recalculated monthly and available on site for inspection purposes. Additionally, each year the facility shall submit all 12 months worth of calculations as part of the AOR submission. [1050221-004-AC]

B.17 Monthly Operations Summary. By the fifth calendar day of each month, the permittee shall record the hours of operation by fuel type, 12-month emission totals for NO_x and CO and amount of each fuel fired for the combustion turbine. Likewise, by the fifth calendar day of each month, the 12-month emission totals for the NO_x requirements that have been placed upon the existing EU-001 by this permit shall be recorded. The information shall be recorded in a written or electronic log and shall summarize the previous month of operation and the previous 12 months of operation. Information recorded and stored as an electronic file shall be available for inspection and/or printing within at least one day of a request from the Compliance Authority. [Rule 62-4.160(15), F.A.C. and 1050221-004-AC]

B.18 Common Conditions. See Appendix C of this permit for additional generic record keeping, reporting and notification requirements. [Chapters 62-4, 62-210, 62-296 and 62-297]

OTHER REQUIREMENTS

B.19 NSPS Provisions. The combustion turbine is subject to applicable requirements in Subpart A (General Provisions) and Subpart GG (Stationary Gas Turbines) of 40 CFR 60. See Appendices D and F of this permit.

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Subsection C. Combustion Turbine-Electrical Generators

This section addresses the following emissions units.

EU No.	Brief Description
Osprey Energy Center	
007	Nominal 170 MW combustion turbine-electrical generator set consisting of a Siemens Westinghouse "F" Class Model No. 501FD unit.
008	Nominal 170 MW combustion turbine-electrical generator set consisting of a Siemens Westinghouse "F" Class Model No. 501FD unit.
009	HRSG equipped with 250 MMBtu per hour gas-fired duct burner system.
010	HRSG equipped with 250 MMBtu per hour gas-fired duct burner system.

Emissions Units 007 – 011 comprise a nominal 540 MW combined cycle unit consisting of two combustion turbines, two HRSG with duct burner systems, and one shared nominal 200 MW steam-electrical generator set. Each CT is fired solely with pipeline natural gas and equipped with inlet foggers on the inlet air system. Each system employs selective catalytic reduction (SCR) to control NO_x emissions. Continuous emissions monitoring systems are used to determine compliance with NO_x emission standards. The HRSG duct burners use low NO_x burners to fire natural gas for peak power production.

Although SCR systems are installed on the combined cycle units, CAM does not apply because compliance with the NO_x emission standards is demonstrated by CEMS.

{Permitting Note: Emissions units 007 and 008 are regulated under Phase II of the federal Acid Rain Program; NSPS Subpart A (General Provisions) and NSPS Subpart GG (Stationary Gas Turbines) in 40 CFR 60; and Rule 212.400(PSD), F.A.C. Emissions units 009 and 010 are regulated under NSPS Subpart A (General Provisions), NSPS Subpart Da (Standards for Performance for Electric Utility Steam Generating Units for Units Constructed After September 18, 1978) in 40 CFR 60; and Rule 212.400(PSD), F.A.C.}

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

C.1 Authorized Fuels. Only natural gas shall be fired in each combustion turbine and each HRSG duct burner system. Fuel oil firing is not permitted. [Rule 62-210.200(PTE), F.A.C. and PSD-FL-287]

C.2 Permitted Capacity - Combustion Turbines: Based on the lower heating value (LHV) of the fuel at ISO conditions, the maximum heat input rate shall not exceed 1669 MMBtu/hour when firing natural gas without power augmentation. The maximum heat input rate will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be maintained by the plant. [Rule 62-210.200(PTE), F.A.C. and PSD-FL-287]

C.3 Permitted Capacity - HRSG with Duct Burners. The maximum heat input rate from firing natural gas of each HRSG duct burner system shall not exceed 250 MMBtu/hour based on the (LHV). [Rule 62-210.200(PTE), F.A.C.]

C.4 Hours of Operation. The maximum allowable hours of operation for the 527 MW Combined Cycle Plant are 8760 hours per year while firing natural gas. [Rule 62-210.200(PTE), F.A.C. and PSD-FL-287]

C.5 SCR System. The permittee shall operate and maintain the SCR system at all times of combustion turbine operation except during periods of startup and shutdown as dictated by manufacturer's guidelines and in accordance with this permit. [Rule 62-210.650, F.A.C. and PSD-FL-287]

EMISSION LIMITATIONS AND STANDARDS

C.6 NO_x Standards.

- a. Combustion Turbine On and Duct Burner On or Off. As determined by CEMS, the concentration of NO_x in the stack exhaust gas shall not exceed 3.5 ppmvd corrected to 15% oxygen based on a 24-hour block

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection C. Combustion Turbine-Electrical Generators

average. This limit shall also apply whether or not each unit is operating with duct burner on and/or in power augmentation mode.

b. *Combustion Turbine On with Power Augmentation and Duct Burners On:* As demonstrated by annual stack test, NO_x emissions shall not exceed 27.5 lb/hour (at 95° F ambient temperature).

c. *Duct Burner System (Only):* NO_x emissions from the duct burner systems shall not exceed 0.1 lb/MMBtu, which is more stringent than the NSPS Subpart Da standards (see Appendix E of this permit). When NO_x monitoring data is not available, substitution for missing data shall be handled as required by 40 CFR 75 to calculate any specified average time. As allowed for in Condition C.12 CEMS data collected during the following periods may be excluded from the 24-hour block average: limited startup data; limited shutdown data; and missing data as defined by 40 CFR 75.

[Rules 62-4.070 and 62-212.400(PSD), F.A.C.; PSD-FL-287; 40 CFR 60.334(b)(3)(iii)]

C.7 Ammonia Slip Standard. As determined by the ammonia testing and monitoring provisions of the subsection, the concentration of ammonia in the exhaust gas shall not exceed 9.0 ppmvd corrected to 15% oxygen. [Rules 62-4.070 and 62-212.400(PSD), F.A.C.; and PSD-FL-287]

C.8 CO Standards. As demonstrated by CEMS, CO emissions shall not exceed the following.

a. *For those days when no valid hour includes the use of duct burner firing, power augmentation or operation below 30% base load (excluding periods of startup and shutdown):* CO emissions in the stack exhaust gas shall not exceed 10 ppmvd corrected to 15% oxygen (at ISO conditions) based on a 24-hour block average.

b. *For those days when at least one valid hour includes the use of duct burner firing, power augmentation or operation below 30% base load (excluding periods of startup and shutdown):* CO emissions in the stack exhaust gas shall not exceed 17 ppmvd corrected to 15% oxygen (at ISO conditions) based on a 24-hour block average.

[Rule 62-212.400, F.A.C. and PSD-FL-287]

C.9 VOC Standards. As demonstrated by initial tests, VOC emissions shall not exceed the following.

a. *Base load with the Duct Burner Off:* VOC emissions in the stack exhaust gas shall not exceed 2.3 ppmvd corrected to 15% oxygen (at ISO conditions) and 5.8 lb/hour.

b. *Base load with Power Augmentation and the Duct Burner On:* VOC emissions in the stack exhaust gas shall not exceed 4.6 ppmvd corrected to 15% oxygen (at ISO conditions) and 12.4 lb/hour.

[Rule 62-212.400, F.A.C. and PSD-FL-287]

C.10 SO₂ Standards: SO₂ emissions shall be limited by firing natural gas with a maximum sulfur content of 2 grains/100 standard cubic feet of gas. Compliance with this requirement shall be demonstrated by implementing the fuel monitoring provisions specified in this subsection as well as the applicable requirements in NSPS Subparts Da (Duct Burners) and GG (Combustion Turbines) in 40 CFR 60 regarding the SO₂ emissions standards. *{Permitting Note: This effectively limits the combined SO₂ emissions from EU-007 and EU-008 to 95.4 tons/year.}* [Rules 62-4.070(3) and 62-212.400(PSD), F.A.C.; PSD-FL-287; and Subparts Da and GG in 40 CFR 60]

C.11 PM/PM₁₀ and VE Standards: Visible emissions shall not exceed 10% opacity. As demonstrated by initial stack tests, PM/PM₁₀ emissions from each unit shall not exceed 24.1 lb/hour at 100% output with the duct burner on and operating in the power augmentation mode. [Rules 62-4.070(3) and 62-212.400(PSD), F.A.C.; and PSD-FL-287]

EXCESS EMISSIONS

C.12 Excess Emissions. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized.

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Excess emissions occurrences shall in no case exceed two hours in any 24-hour period except during both “cold start-up” to, and shutdowns from, combined cycle plant operation. During cold start-up to combined cycle operation, up to four hours of excess emissions are allowed. During shutdowns from combined cycle operation, up to three hours of excess emissions are allowed. Cold start-up is defined as a startup to combined cycle operation following a complete shutdown lasting at least 48 hours. Operation below 30% output per turbine shall otherwise be limited to 2 hours in any 24-hour period. [Rule 62-210.700(3), F.A.C. and PSD-FL-287]

C.13 Reporting Excess Emission. If a unit exceeds the CO or NO_x emissions standards based on 24-hour block average, the permittee shall report the excess emissions to the Compliance Authority within one working day. Also, for the purpose of reporting excess NO_x emissions in accordance with 40 CFR 60.334, the NO_x CEMS shall be used in lieu of the water-to-fuel ratio data. [Rules 62-210.700, 62-4.130 and 62-4.160(8), F.A.C.; 40 CFR 60.7; and PSD-FL-287].

MONITORING OF OPERATIONS

C.14 CO and NO_x CEMS. To demonstrate continuous compliance with the applicable standards, the permittee shall install, calibrate, maintain, and operate CEMS in each stack to measure and record CO and NO_x emissions and oxygen concentration from these units.

a. NO_x CEMS: The NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. Annual RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E in Appendix A of 40 CFR 60. The span for the NO_x monitor shall be based on the emissions standards. The use of the missing data substitution methodology provided in Subpart D of 40 CFR 75 is not required for identifying excess NO_x emissions. Instead, periods of missing CEMS data are to be reported as monitor downtime in the excess emissions and monitoring performance report required in 40 CFR 60.7(c). As allowed for in Condition C.12 CEMS data collected during the following periods may be excluded from the 24-hour block average: limited startup data; limited shutdown data; and missing data as defined by 40 CFR 75. Upon request from DEP, the CEMS emission rates shall be corrected to ISO conditions to demonstrate compliance with the applicable standards listed within this permit and established in 40 CFR 60.332.

b. CO and Oxygen CEMS: The permittee shall install, operate and maintain a CO CEMS certified pursuant to Performance Specification 4 in Appendix B of 40 CFR 60. The oxygen monitor shall be certified pursuant to Performance Specification 3 in Appendix B of 40 CFR 60. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of section 7 shall be made each calendar quarter, and reported semi-annually to the Compliance Authority. The RATA tests required for the CO monitor shall be performed using EPA Method 10 in Appendix A of 40 CFR 60. The Method 10 analysis shall be based on a continuous sampling train, and the ascarite trap may be omitted or the interference trap of section 10.1 may be used in lieu of the silica gel and ascarite traps. The span for the CO monitor shall be based on the emissions standards. The RATA tests required for the oxygen monitor shall be performed using EPA Method 3B in Appendix A of 40 CFR 60. The span for the oxygen monitor shall not be greater than 21%.

c. Continuous Compliance: Continuous compliance with the applicable CO and NO_x emission limits shall be demonstrated by CEMS. Based on the CEMS data, a separate compliance determination is conducted at the end of each period and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous period. Valid hourly emission rates shall not include periods of start up or shutdown unless prohibited by 62-210.700 F.A.C. A valid hourly emission rate shall be calculated for each hour in which at least two measurements are obtained at least 15 minutes apart. Excess emissions periods shall be reported as required in Conditions C.12 and C.13. [Rules 62-4.070 F.A.C., 62-210.700, F.A.C., 40 CFR 75 and PSD-FL-287.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

Subsection C. Combustion Turbine-Electrical Generators

C.15 Fuel Monitoring. To demonstrate compliance with the fuel sulfur limit of this permit, the permittee shall use the appropriate sampling and analytical methods identified in either Appendix D of 40 CFR 75 or 40 CFR 60.335. The monitoring frequency shall be determined by the requirements of 40 CFR 60.334 or an approved custom fuel monitoring schedule in accordance with Appendix D of 40 CFR 75 or 40 CFR 60.334. [PSD-FL-287]

COMPLIANCE TESTING

C.16 Test Methods. As required, the following test methods shall be used to determine emissions.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Emissions from Stationary Sources.
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources
18	Measurement of Gaseous Organic Compound Emissions (Gas Chromatography) <i>{Note: Optional testing in accordance with EPA Method 18 may be conducted to account for the actual methane fraction of the measured VOC emissions, if specifically requested.}</i>
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates <i>{Note: Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.}</i>
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines
25	Method for Determining Gaseous Organic Concentrations
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)
26A	(Modified) Method for Determining Ammonia Emissions
206	Method for Determining Ammonia Emissions (Ion Chromatographic Analysis)
320	Measurement of Vapor Phase Organic and Inorganic Emissions by Extractive Fourier Transform Infrared (FTIR) Spectroscopy (for Ammonia)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A; 40 CFR 60.334; and PSD-FL-287]

C.17 Frequency of Compliance Tests. The permittee shall conduct the following compliance tests:

- Initial Tests:** Initial tests were required for CO, NO_x, PM, VOC, ammonia and visible emissions.
- Annual Tests:** During each federal fiscal year (October 1 - September 30), the permittee shall have a formal compliance test conducted for CO, NO_x, ammonia and visible emissions. Annual tests for CO shall be conducted at 100% capacity with the duct burners off and at 100% load with power augmentation and the duct burners on. The required annual RATA test data may be used to demonstrate compliance with the annual test requirement for CO and NO_x emissions. Compliance with the CO standards serves as a surrogate for compliance with the VOC standards.
- Tests Prior to Renewal:** Prior to renewing the air operation permit, the permittee shall conduct compliance tests for CO, NO_x, PM, VOC, and visible emissions from the combustion turbine. These tests shall be conducted within the 12-month period prior to renewing the air operation permit. For pollutants that are required to be tested annually, the permittee may submit the most recent annual compliance test to satisfy the requirements of this provision.
- Tests After Substantial Modifications:** All performance tests required for initial startup shall also be conducted after any substantial modification and appropriate shakedown period of air pollution control

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equipment. Shakedown periods shall not exceed 100 days after re-starting the combustion turbine.

- e. Ammonia Slip: For each required test, the permittee shall calculate and report the ammonia slip (ppmvd @ 15% O₂) at the measured NO_x emission rate (lb/hour) as a means of compliance with the BACT standard.

[PSD-FL-287; 40 CFR 60.7 and 60.8; Rules 62-297.310(7)(a)4 and 9, F.A.C.]

C.18 Testing procedures: Unless otherwise specified, testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum heat input rate allowed by the permit, corrected for the average ambient air temperature during the test with 100% represented by a curve depicting heat input vs. compressor inlet temperature. Procedures for these tests shall meet all applicable requirements in Appendix C of this permit. [PSD-FL-287]

C.19 SCR and Ammonia Slip. The permittee shall be capable of calculating ammonia slip at the Department's request according to the following procedure.

- a. In accordance with the manufacturer's specifications, the permittee shall calibrate, operate and maintain an ammonia flow meter to measure and record the ammonia injection rate to the SCR system of each unit.
- b. For each unit, the permittee shall annually conduct simultaneous stack tests for NO_x and ammonia emissions while operating with power augmentation and duct firing. The ammonia injection rate necessary to comply with the NO_x standard shall be established and reported during each performance test.
- c. Similarly, the permittee shall conduct tests for a range of load conditions and shall determine and report the ammonia flow rate required to comply with the ammonia and NO_x standards. During periods of NO_x CEMS downtimes or malfunctions, the permittee shall operate at an acceptable ammonia flow rate as established stack test.
- d. Ammonia emissions shall be calculated continuously using inlet and outlet NO_x concentrations from the SCR system and ammonia flow supplied to the SCR system. The calculation procedure shall be provided with the CEMS monitoring plan required by 40CFR Part 75. The following calculation represents one means by which the permittee may demonstrate compliance with this condition:

$$\text{Ammonia Slip (ppmvd @ 15\% O}_2\text{)} = (A - (BC/1,000,000)) (1,000,000/B) (D)$$

Where:

- A = ammonia injection rate (lb/hour) / 17 lb/lb-mol
- B = dry gas exhaust flow rate (lb/hour) / 29 lb/lb-mol
- C = change in measured NO_x (ppmvd @ 15% O₂) across catalyst
- D = correction factor, derived annually during compliance testing by comparing actual to tested ammonia slip.

The calculation along with each newly determined correction factor shall be submitted with each annual compliance test. Calibration data ("as found" and "as left") shall be provided for each measurement device utilized to make the ammonia emission measurement and submitted with each annual compliance test. The calculation will exclude periods of startup and shutdown when determining the ammonia slip limit. The permittee shall notify the Department within 2 business days if the calculated ammonia emissions exceed 9.0 ppmvd corrected to 15% O₂ over a 3-hour block average. The notification shall include a corrective action plan to reduce ammonia emissions below 9 ppmvd corrected to 15% O₂ over a 3-hour block average. Upon specific request by the Department, a special re-test shall occur as described in the previous conditions concerning annual test requirements to demonstrate compliance with all NO_x and ammonia slip related permit limits. [PSD-FL-287]

C.20 Common Conditions. See Appendix C of this permit for additional generic record keeping, reporting and notification requirements. [Chapters 62-4, 62-210, 62-296 and 62-297]

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Subsection C. Combustion Turbine-Electrical Generators

RECORDS AND REPORTS

C.21 Continuous Monitoring System Reports: The monitoring devices shall comply with the certification and quality assurance, and any other applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.13, including certification of each device in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) or 40 CFR Part 75. Quality assurance procedures must conform to all applicable sections of 40 CFR 60, Appendix F or 40CFR75. [PSD-FL-287]

C.22 Common Conditions. See Appendix C of this permit for additional generic record keeping, reporting and notification requirements. [Chapters 62-4, 62-210, 62-296 and 62-297]

OTHER REQUIREMENTS

C.23 NSPS Provisions. The combustion turbines are subject to the applicable requirements of Subpart A (General Provisions) and Subpart GG (Stationary Gas Turbine) in 40 CFR 60. See Appendices D and F of this permit. The HRSG equipped with duct burner systems are subject to the applicable requirements of Subpart A (General Provisions) and Subpart Da (Standards for Performance for Electric Utility Steam Generating Units for Units Constructed After September 18, 1978) in 40 CFR 60. See Appendices D and E of this permit.

SECTION 4. ACID RAIN PART

Subsection A. This section addresses the following acid rain units.

Operated by: Auburndale Operating Services Company, Inc.

ORIS Code: 54658, Auburndale Power Plant and Auburndale Peak Energy Center
55412, Osprey Energy Center

EU No.	Brief Description
Auburndale Power Plant	
001	Nominal 156 MW combined cycle unit consisting of a combustion turbine-electrical generator set rated at 121.5 MW, an unfired HRSG and a nominal 52 MW steam turbine-electrical generator set.
Auburndale Peak Energy Center	
006	Nominal 120 MW simple cycle combustion turbine-electrical generator set
Osprey Energy Center	
007	Nominal 170 MW combined cycle combustion turbine-electrical generator set
008	Nominal 170 MW combined cycle combustion turbine-electrical generator set

A.1 Acid Rain Part. The Phase II Acid Rain Part application is a part of this permit. The owners and operators of the Phase II acid rain units must comply with the standard requirements and special provisions set forth in the following application: DEP Form No. 62-210.900(1)(a), effective 04/16/01, received August 15, 2002 and August 29, 2001. [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2 SO₂ allowances. The SO₂ allowance allocations for each Acid Rain unit are as follows:

EU No.	EPA ID	SO ₂ Allowances to be Determined by EPA				
		2003	2004	2005	2006	2007
001	1	0*	0*	0*	0*	0*
006	6	0*	0*	0*	0*	0*
007	CT-1	0*	0*	0*	0*	0*
008	CT-2	0*	0*	0*	0*	0*

* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.

A.3 Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

- No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
- No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

A.4 Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62-214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts. [Rules 62-213.413 and 62-214.370(4), F.A.C.]

A.5 Comments, Notes and Justifications: The designated representative was changed by letter dated July 5, 2007, with a revised Certificate of Authorization.

SECTION 4. ACID RAIN PART

Acid Rain Part- Page 1

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: ☐ New ☒ Revised

STEP 1

Identify the source by plant name, State, and ORIS code

Plant Name Auburndale Cogeneration Facility	State Florida	ORIS Code 54658
---	---------------	-----------------

STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a." For new units, enter the requested information in columns "c" and "d."

a Unit ID#	b Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	c New Units Commence Operation Date	d New Units Monitor Certification Deadline
1	Yes		
6	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

SECTION 4. ACID RAIN PART

Acid Rain Part - Page 2

Plant Name (from Step 1) Auburndale Cogeneration Facility

STEP 3 Read the standard requirements

Acid Rain Part Requirements

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain part.
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the Department; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain part application, the Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the Department:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

SECTION 4. ACID RAIN PART

Acid Rain Part - Page 3

STEP 3,
Cont'd.

Plant Name (from Step 1) Auburndale Cogeneration
Facility

Recordkeeping and Reporting Requirements (cont)

- (iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

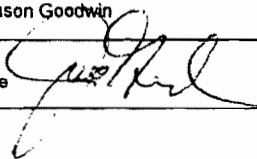
- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Certification

Read the
certification
statement, sign,
and date

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Jason Goodwin	
Signature 	Date 7/2/07

SECTION 4. ACID RAIN PART

Acid Rain Part- Page 1

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: ☐ New ☒ Revised

STEP 1

Identify the source by
plant name, State, and
ORIS code

Plant Name Osprey Energy Center

State Florida

ORIS Code 55412

STEP 2

Enter the unit ID# for every
Acid Rain unit at the Acid
Rain source in column "a."
For new units, enter the
requested information in
columns "c" and "d."

a	b	c	d
Unit ID#	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
CT1	Yes		
CT2	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

SECTION 4. ACID RAIN PART

Acid Rain Part - Page 2

Plant Name (from Step 1) Osprey Energy Center

STEP 3 Read the standard requirements

Acid Rain Part Requirements

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the Department; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain part application, the Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the Department:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

SECTION 4. ACID RAIN PART

Acid Rain Part - Page 3

Plant Name (from Step 1) Osprey Energy Center

STEP 3. Cont'd.

Recordkeeping and Reporting Requirements (cont)

- (iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 78.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudency review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Read the
certification
statement, sign,
and date

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Jason Goodwin

Signature 

Date

7/2/07

SECTION 5. APPENDICES

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Appendix A. Citation Formats
Appendix B. General Conditions
Appendix C. Common Conditions
Appendix D. NSPS Subpart A, General Provisions
Appendix E. NSPS Subpart Da Provisions, Electric Utility Steam Generating Units
Appendix F. NSPS Subpart GG Provisions, Stationary Gas Turbines
Appendix G. Permit History
Appendix H. Insignificant Emissions Units and Activities
Appendix I. Unregulated Emissions Units
Appendix V. Title V Conditions

SECTION 5. APPENDIX G**Permit History**

Auburndale Energy Complex

Facility ID No. 1050221

<u>EU No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
-001	Combined Cycle Combustion Turbine	AC53-208321/ PSD-FL-185 1050221-004-AC	12/14/92	10/30/95	11/1/96	6/20/94, 3/18/96, 5/22/97 2/26/02, xx/xx/xx
-002	Fuel oil storage tanks (2)					
-003	Emergency generators					
-004	Heating units and engines					
-005	Surface coating operations					
-006	Simple Cycle Combustion Turbine	1050221-004-AC		4/1/03		4/29/02
-007	Combustion Turbine	1050334-001-AC				
-008	Combustion Turbine	1050334-001-AC				
-009	Duct Burner	1050334-001-AC				
-010	Duct Burner	1050334-001-AC				
-011	Cooling Tower	1050334-001-AC				
All	Initial Title V	1050221-002-AV				
All	Title V Renewal	1050221-007-AV		12/31/07		
All	Title V Revision	1050221-009-AV		12/31/07		
All	Air Construction Permit Mod	1050221-010-AC				

Note: The Osprey Energy Center was originally permitted as Facility ID No. 1050334, but was later merged into Facility ID No. 1050221 with the Auburndale Power Plant and the Auburndale Peak Energy Center

SECTION 5. APPENDIX H
Insignificant Emissions Units and Activities

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source. The emissions units and activities listed below are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1. Comfort heating with a gross maximum heat input of less than one million Btu per hour.
2. Vacuum pumps in laboratory operations.
3. Belt or Drum Sanders having a total sanding surface of five square feet or less and other equipment used exclusively on woods or plastics or their products having a density of 20 pounds per cubic foot or more.
4. Equipment used exclusively for space heating, other than boilers.
5. Laboratory equipment used exclusively for chemical or physical analyses (including fume hoods and vents).
6. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
7. Degreasing units using heavier-than-air vapors exclusively, except any unit using or emitting any substance classified as a hazardous air pollutant.
8. No. 2 Fuel Oil Truck Unloading Equipment.
9. Oil/Water Separators.
10. Freshwater cooling towers. The cooling towers do not use chromium-based water treatment chemicals.
11. Refrigeration Units.
12. Lube Oil Vents Associated with Rotating Equipment.
13. Lube Oil Tank Vents.
14. Internal combustion engines used for transportation of passengers and freight.
15. Steam cleaning equipment.
16. Fire and safety equipment.
17. Brazing, soldering, or welding equipment.
18. Petroleum Lube Systems
19. Application of fungicide, herbicide, or pesticide
20. Non-halogenated solvent storage and cleaning operation, provided the solvents contain none of the hazardous air pollutants listed in Rule 62-210.200, F.A.C.
21. Vehicle refueling operations and associated fuel storage
22. Storage tanks less than 250 gallons
23. General Plant maintenance activities including, but no limited to, welding, grinding, and general vehicle repair (excluding air-conditioning systems).
24. Water and wastewater treatment equipment
25. Turbine Vapor Extractor
26. Wet surface air coolers
27. Sand Blasting and abrasive grit blasting where temporary total enclosures are used to contain particulate matter emissions.
28. Vehicular Traffic on plant roadways and grounds
29. Architectural (equipment) maintenance painting
30. One (1) 1,250 KW emergency generator diesel engine
31. One (1) 265 HP fire water pump diesel engine
32. Two fuel storage tanks

SECTION 5. APPENDIX I

Unregulated Emissions Units

An "unregulated emissions unit" is an emissions unit which emits no emissions-limited pollutant and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from otherwise applicable unit-specific emissions or work practice standards (e.g., recordkeeping requirements for small storage tanks under 40 CFR 60, Subpart Kb). All fugitive emissions not subject to unit-specific work practice standards may be included in the application as one or more separate unregulated emissions units.

The following emissions units are considered unregulated emissions units.

EU No.	Brief Description
Auburndale Power Plant	
002	Fuel oil storage tanks
003	Emergency generators [Rule 62-210.300(3)(a), F.A.C.]
004	Heating units and engines [Rule 62-210.300(3)(a), F.A.C.]
005	Surface coating operations [Rule 62-210.300(3)(a), F.A.C.]
011	Cooling tower consisting of 8 cells with individual exhaust fans.

1. Drift Eliminators for PM/PM₁₀ Emissions. Drift eliminators shall be installed on the cooling tower (EU-011) to achieve a maximum designed drift rate of 0.002 gallons/100 gallons of recirculation water flow rate. The permittee shall maintain a certification that the installed equipment meets this design specification. [PSD-FL-287]

Friday, Barbara

To: jgoodwin@calpine.com; Heidi Whidden; 'tdavis@ectinc.com'; Zhang-Torres; Forney.Kathleen@epamail.epa.gov
Cc: Thomas, Bruce X.
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex
Attachments: 1050221-013-AV-NoticeofIntent.pdf; 1050221-013-AV - Appendices.pdf; 1050221-013-AV - Draft Permit.pdf; 1050221-013-AV - SOB.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 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).

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Thank you,

DEP, Bureau of Air Regulation

10/11/2007

Friday, Barbara

From: System Administrator
To: Thomas, Bruce X.; Zhang-Torres
Sent: Thursday, October 11, 2007 2:14 PM
Subject: Delivered:DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

Your message

To: 'jgoodwin@calpine.com'; 'Heidi Whidden'; 'tdavis@ectinc.com'; Zhang-Torres; 'Forney.Kathleen@epamail.epa.gov'
Cc: Thomas, Bruce X.
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex
Sent: 10/11/2007 2:13 PM

was delivered to the following recipient(s):

Thomas, Bruce X. on 10/11/2007 2:14 PM
Zhang-Torres on 10/11/2007 2:14 PM

Friday, Barbara

From: Exchange Administrator
Sent: Thursday, October 11, 2007 2:14 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT432739.txt; DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex



ATT432739.txt
(367 B)



DRAFT Title V
Permit Renewal N...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

jgoodwin@calpine.com
HWhidden@calpine.com

Friday, Barbara

From: Exchange Administrator
Sent: Thursday, October 11, 2007 2:15 PM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)

Attachments: ATT432747.txt; DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex



ATT432747.txt
(284 B)

DRAFT Title V
Permit Renewal N...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

tdavis@ectinc.com

Friday, Barbara

From: System Administrator [postmaster@calpine.com]
Sent: Thursday, October 11, 2007 2:16 PM
To: Friday, Barbara
Subject: Delivered: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

Attachments: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex



DRAFT Title V
Permit Renewal N...

<<DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex>> Your message

To: Jason Goodwin; Heidi Whidden; tdavis@ectinc.com; Zhang-Torres; Forney.Kathleen@epamail.epa.gov
Cc: Thomas, Bruce X.
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex
Sent: Thu, 11 Oct 2007 11:13:26 -0700

was delivered to the following recipient(s):

Heidi Whidden on Thu, 11 Oct 2007 11:15:27 -0700
MSEXCH:MSExchangeMTA:San-Jose:FOLEMAIL5

Friday, Barbara

From: System Administrator [postmaster@calpine.com]
Sent: Thursday, October 11, 2007 2:16 PM
To: Friday, Barbara
Subject: Delivered: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

Attachments: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex



DRAFT Title V
Permit Renewal N...

<<DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex>> Your message

To: Jason Goodwin; Heidi Whidden; tdavis@ectinc.com; Zhang-Torres;
Forney.Kathleen@epamail.epa.gov
Cc: Thomas, Bruce X.
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex
Sent: Thu, 11 Oct 2007 11:13:26 -0700

was delivered to the following recipient(s):

Jason Goodwin on Thu, 11 Oct 2007 11:15:51 -0700
MSEXCH:MSExchangeMTA:San-Jose:CPMAILCRO2

Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Thursday, October 11, 2007 2:48 PM
Subject: Read: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

Your message

To: 'jgoodwin@calpine.com'; 'Heidi Whidden'; 'tdavis@ectinc.com'; Zhang-Torres; 'Forney.Kathleen@epamail.epa.gov'
Cc: Thomas, Bruce X.
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex
Sent: 10/11/2007 2:13 PM

was read on 10/11/2007 2:48 PM.

Friday, Barbara

From: Jason Goodwin [jgoodwin@calpine.com]
Sent: Thursday, October 11, 2007 2:40 PM
To: Friday, Barbara
Subject: Re: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

Got it - thanks.

Thanks,

Jason Goodwin
Calpine Eastern Region
713.570.4795 o
713.252.8064 c

----- Original Message -----

From: Friday, Barbara <Barbara.Friday@dep.state.fl.us>
To: Jason Goodwin; Heidi Whidden; tdavis@ectinc.com <tdavis@ectinc.com>; Zhang-Torres <Cindy.Zhang-Torres@dep.state.fl.us>;
Forney.Kathleen@epamail.epa.gov <Forney.Kathleen@epamail.epa.gov>
Cc: Thomas, Bruce X. <Bruce.X.Thomas@dep.state.fl.us>
Sent: Thu Oct 11 13:13:26 2007
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

Dear Sir/Madam:

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Thank you,

DEP, Bureau of Air Regulation

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.

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Thursday, October 11, 2007 2:37 PM
To: Friday, Barbara
Subject: RE: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Thursday, October 11, 2007 2:13 PM
To: jgoodwin@calpine.com; Heidi Whidden; tdavis@ectinc.com; Zhang-Torres; Forney.Kathleen@epamail.epa.gov
Cc: Thomas, Bruce X.
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

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10/12/2007

Friday, Barbara

From: Mailer-Daemon@ectinc.com
Sent: Thursday, October 11, 2007 2:29 PM
To: Friday, Barbara
Subject: Confirm: 'DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex' received

A message which requested delivery confirmation recently arrived at this server. This server honors all delivery confirmation requests whether generated from local mail traffic or from mail received via an outside source (such as SMTP/POP).

Message-ID: <1900D374FE4CCB4AB8DEB001320338BABA7F57@tlhexsmb5.floridadep.net>
To : tdavis@ectinc.com
From : Barbara.Friday@dep.state.fl.us
Subject : DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex
Date : Thu, 11 Oct 2007 14:13:26 -0400

Receiving Domain: ectinc.com

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive01.rtp.epa.gov]
Sent: Thursday, October 11, 2007 2:14 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report

Attachments: Delivery report; Message Headers



Delivery report.txt
(492 B)



Message
Headers.txt (2 KB)

This is the mail system at host mseive01.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 470E67D7_18486_19345_215

Friday, Barbara

From: Heidi Whidden [HWhidden@calpine.com]
Sent: Friday, October 12, 2007 8:15 AM
To: Friday, Barbara
Subject: RE: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

Thank you!

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Thursday, October 11, 2007 2:13 PM
To: Jason Goodwin; Heidi Whidden; tdavis@ectinc.com; Zhang-Torres; Forney.Kathleen@epamail.epa.gov
Cc: Thomas, Bruce X.
Subject: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

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10/12/2007

Friday, Barbara

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, October 16, 2007 11:11 AM
To: Friday, Barbara
Subject: Re: DRAFT Title V Permit Renewal No.: 1050221-013-AV - Auburndale Power Partners, L.P. - Auburndale Energy Complex

got it... thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Friday,
Barbara"
<Barbara.Friday@
dep.state.fl.us>

10/11/2007 02:13
PM

To
<jgoodwin@calpine.com>, "Heidi
Whidden" <HWhidden@calpine.com>,
<tdavis@ectinc.com>,
"Zhang-Torres"
<Cindy.Zhang-Torres@dep.state.fl.
us>, Kathleen
Forney/R4/USEPA/US@EPA

CC
"Thomas, Bruce X."
<Bruce.X.Thomas@dep.state.fl.us>
Subject
DRAFT Title V Permit Renewal No.:
1050221-013-AV - Auburndale Power
Partners, L.P. - Auburndale
Energy Complex

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 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).

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