



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 30, 2002

Mr. Benjamin M. H. Borsch, P.E.
Environmental Manager
Calpine Eastern Corporation
Island Center
2701 N. Rocky Point Drive
Suite 1200
Tampa, Florida 33607

Dear Mr. Borsch:

Re: Title V - Renewal and Initial Permit for Auburndale Power Plant
File No. 1050221-007-AV
ORIS Code No. 54658

Thank you for your recent submission of a Title V Air Operation Permit Renewal/Initial Application for the referenced plant. However, we must deem your application incomplete for the following reasons:

1. In your application (page 40) you indicated that a Compliance Assurance Monitoring (CAM) Plan was attached in Appendix J for the 156 MW combined cycle combustion turbine. The CAM regulation at 40 CFR 64.2(b)(vi) provides an exemption for units that demonstrate continuous compliance, i.e. CEMS. Condition A.22.6. in the FINAL Permit No. 1050221-001-AV requires a NOx CEMS to be used to demonstrate compliance with the NOx emission limits specified in condition A.8. Based upon the exemption provided for at 40 CFR 64.2(b)(vi) and your permit condition, this emissions unit is exempt from the CAM requirements. Please confirm.
2. CAM may apply to the 104 MW simple cycle combustion turbine. In your application (page 80) you checked that CAM was "not applicable." cursory review of Permit No. 1050221-004-AC does not show that a NOx CEMS is used to demonstrate continuous compliance with the emission limits specified in condition 14. By using a NOx CEMS to demonstrate continuous compliance with the NOx emission limits, this emissions unit can be exempted from the CAM requirements. Do you wish to use the NOx CEMS to demonstrate continuous compliance with the NOx emission limits? If so, a permit condition similar to condition A.22.6. from FINAL permit 1050221-001-AV will need to be added to the initial Title V permit for this emissions unit.

"More-Protection, Less Process"

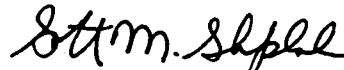
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3. According to your application (page 79) the new 104 MW emissions unit's initial compliance test results were required to be submitted by July 29, 2002. Has the unit demonstrated compliance with all of the terms and conditions of Permit No. 1050221-004-AC?
4. You reference the Acid Rain Part Applications in Appendix K of the Title V permit application. However, only an updated Certificate of Representation was provided. The department pursuant to Rule 62-214.320(1)(i), F.A.C. requires that, "the designated representative of any Title V source having a Title V permit with an Acid Rain Part shall submit a complete application for renewal of the Title V permit with the Acid Rain Part for each Acid Rain unit at the source." Also, please submit the Phase II Acid Rain Part application for the new 104 MW unit as part of the initial Title V application package.

When we receive this information we will continue processing your application. If you have any questions related to acid rain, please contact Tom Cascio at 850/921-9526 otherwise, please contact me at 850/921-9532.

Sincerely,



Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/bjf

copy to: Mr. Bob Callery, Designated Representative, Auburndale Power Partners
Mr. Jeffery Shaske, Calpine Eastern Corporation
Mr. Jerry Kissel, P.E., SWD



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

May 7, 2002

David B. Struhs
Secretary

Mr. Benjamin M. H. Borsch, P.E.
Environmental Manager
Auburndale Power Partners, L.P.
Island Center
2701 N. Rocky Point Drive
Tampa, Florida 33607

Re: Request to Delete Sulfuric Acid Mist Emission Limitations
Permit Nos. 1050221-002-AV and PSD-FL-185

Dear Mr. Borsch:

The Department received your letter dated April 22, requesting deletion of the sulfuric acid mist emission limitations from the subject permits.

In order to process your request, please provide an application for a combined Title V permit revision/PSD permit modification, which includes the certifications by the responsible official and a professional engineer registered in Florida {pages 1-7 of DEP Form No. 62-210.400(1)}.

Upon receipt of the application we will begin processing your application. If you should have any questions, please call me at 850/921-9532.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/bjf