



**CALPINE**

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August 12, 2002

Fed Ex Tracking No: 7900 1870 3659

Mr. Scott Sheplak  
**Florida Department of Environmental Protection**  
**Bureau of Air Regulation**  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

**RECEIVED**

**AUG 14 2002**

Re: Auburndale Energy Campus  
Title V Renewal and Initial Permit  
File No. 1050221-007-AV

**BUREAU OF AIR REGULATION**

Dear Mr. Sheplak:

This letter is written in response to your July 30, 2002 letter requesting additional information regarding the subject permit application. The questions listed in your letter are listed below followed by the responses.

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 CFT 64.2(b)(vi) provides an exception for units that demonstrate continuous compliance, i.e. CEMS. Conditions 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.

Response:

*The department is correct in this evaluation. The 156 MW combined cycle turbine is exempt from CAM requirements. A corrected copy of page 40 of the application is attached.*

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.

Response:

*A NOx CEMS is required to be used on the 104 MW simple cycle turbine (EU-006) to assure compliance with the NOx emission limitations of Permit No. 1050221-004-AC. This requirement is listed in Condition 31 of that permit. Based on the exemption granted in 40 CFR 64.2(b)(vi), this unit is not subject to the requirement for CAM. We have assumed that a condition or conditions addressing the requirements of Condition 31 of Permit No. 1050221-004-AC would be included in the Title V permit for this emissions unit.*

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.

Response:

*EU-006 was tested for compliance with all permit conditions for Natural Gas fired operation on June 13 and 14, 2002. The unit was in compliance with all applicable permit conditions. Compliance test results have been submitted to the agency. EU-006 was tested for compliance with all permit conditions for Fuel Oil fired operation on July 26, 2002. The unit demonstrated compliance with all applicable permit conditions. Compliance test results will be submitted within 45 days of the completion of the test.*

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.

Response:

*Our understanding of Chapter 62-214.320 was that the Acid Rain Part could be processed separately from the Title V application so long as timely application was made in accordance with the requirement of each permit. The Acid Rain Permit for this source was updated on October 11, 2001 to include the operation of the new unit (EU-006). A copy of this permit application is attached, along*

Mr. Scott Sheplak  
August 12, 2002  
Page 3

*with the response from the department indicating receipt of this application. Also attached is a copy of the page from the Clean Air Markets website indicating the current status of the units. Please note that subsequent to the submission of the application, the unit designations were changed from CT1 and CT2 (as shown on the application) to units 1 and 6 in order to maintain consistency with the FDEP issued emission unit numbers.*

I hope that these responses provide the information required for the department to continue to process the subject application. If you have further questions or need additional information, please do not hesitate to contact me by telephone at (813) 637-7305 or via email at [bborsch@calpine.com](mailto:bborsch@calpine.com).

Sincerely,

Calpine Eastern Corporation

A handwritten signature in black ink, appearing to read "Benjamin M. H. Borsch".

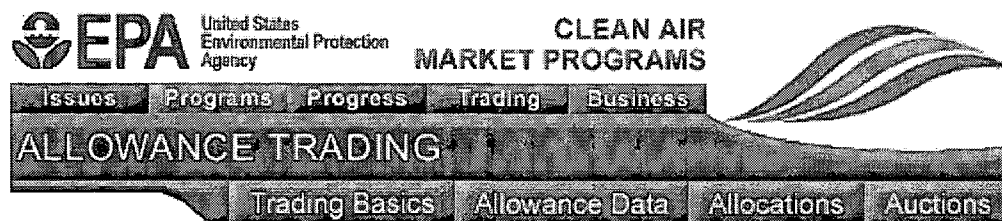
Benjamin M. H. Borsch, P.E.  
Environmental Manager

attachments

cc: Mr. Bob Callery, APP  
Mr. Jeffrey Shaske, APP  
Mr. Jerry Kissel, P.E. FDEP Southwest District

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation [ X ] Attached, Document ID: <i>Appendix G</i> [ ] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [ ] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [ ] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [ ] Attached, Document ID: _____ [ X ] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [X] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: <u>Appendix K</u> [ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [ ] Not Applicable



## ATS - Account Owner Report

Account ID	Account/Plant Name	Sta	Account Owner Name	Representative Name	
054658000001	Auburndale Cogeneration Facility	FL	Calpine Eastern Corporation	Callery	Robert
054658000001	Auburndale Cogeneration Facility	FL	Auburndale Power Partners, LP	Callery	Robert
054658000006	Auburndale Cogeneration Facility	FL	Auburndale Peaker Energy Ctr, LLC	Callery	Robert
054658000006	Auburndale Cogeneration Facility	FL	Calpine Eastern Corporation	Callery	Robert

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file -

## Sheplak, Scott

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**From:** Sheplak, Scott  
**Sent:** Wednesday, August 14, 2002 3:03 PM  
**To:** 'bborsch@calpine.com'  
**Cc:** Cascio, Tom  
**Subject:** Title V - Renewal and Initial Permit for Auburndale Power Plant

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 prompt reply to our July 30th letter. As to the acid rain application incompleteness item, what we need is a newly signed form. The form you submitted was for the revision to include the new unit. We need an updated form for the Title V permit renewal application. The new form - **DEP 62-210.900(1)(a), Phase II Permit Application** is posted on this web site address <http://www.dep.state.fl.us/air/forms/acidrain.htm#acidrain>. Please complete, sign, date and submit the updated form. Thank you.

Sincerely,

Scott M. Sheplak, P.E.  
Administrator  
Title V Section  
State of Florida, Department of Environmental Protection  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399

850/921-9532  
[Scott.Sheplak@dep.state.fl.us](mailto:Scott.Sheplak@dep.state.fl.us)