

**AUBURNDALE POWER PARTNERS, LIMITED PARTNERSHIP**

12500 Fair Lakes Circle Suite 200 Fairfax, Virginia 22033-3804

Telephone: (703) 222-0445 Fax: (703) 222-0516

March 19, 1997

LTR.APP0075

**RECEIVED**

**MAR 20 1997**

**BUREAU OF  
AIR REGULATION**

Mr. Scott M. Sheplak, P.E.  
Administrator, Division of Air Resources Management  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Subj: Auburndale Cogeneration Facility  
DRAFT Title V Permit No: 1050221-002-AV**

Dear Mr. Sheplak:

The Florida Department of Environmental Protection (FDEP) provided a copy of the draft Title V permit for the Auburndale Cogeneration Facility to Auburndale Power Partners, Limited Partnership (APP) in correspondence dated February 5, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Lakeland Ledger on February 18, 1997; a copy of the newspaper's affidavit was provided to you on February 19, 1997.

APP has reviewed the draft Title V permit and hereby submits comments for your consideration; reference Attachment I. As you may be aware, APP is currently in the process of amending its initial construction permits (AC53-208321, PSD-FL-185). On February 25, 1997, the FDEP issued its intent to approve these permit amendments. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" was published in the Lakeland Ledger on March 12, 1997; a copy of the newspaper's affidavit was provided to FDEP (Mr. C.H. Fancy, P.E.) on March 12, 1997. Many of the comments on the draft Title V permit shown on Attachment I address the pending construction permit modification. While we have attempted to cover all aspects of the construction permit modification in our comments on the draft Title V permit, APP requests that FDEP review the final air construction permit modification, when issued, to ensure that all changes are properly included in the Title V permit.

Mr. Scott M. Sheplak, P.E.  
FDEP  
March 19, 1997  
Page 2

Your review of our comments on the draft Title V permit is appreciated. Please call me at (703) 222-0445 if there are any questions concerning these comments. I am also available to meet with you on a mutually agreeable date if you feel a meeting to discuss the comments would be beneficial.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce L. Franco", with a stylized flourish at the end.

Bruce L. Franco, P.E.  
Executive Director

BLF/bp

Attachment

ATTACHMENT I  
Auburndale Power Partners  
Comments on Draft Title V Permit No. 1050221-002-AV

The following comments are provided on Draft Title V Permit No. 1050221-002-AV. Text shown highlighted represents requested additions while text shown with a strikeout line represents requested deletions.

1. Change "Auburndale Power Partners, Ltd." to "Auburndale Power Partners, Limited Partnership" throughout permit.

2. Page 3: Revise first sentence as follows:

The documents listed below are not a part of this permit. ~~H~~however, ~~they~~ are specifically related to this permit action.

3. Page 5, Condition No. 8: Insert "on an as needed basis" after the word precautions.

The Permittee shall take reasonable precautions, on an as needed basis, to prevent emissions...

4. Page 6, Subsection A: Change "steam injection" reference to "water injection (all phases)".

~~Steam~~ Water injection (all phases) and good combustion...

5. Page 7, Condition A.6: Change annual ton/year limit for PM<sub>10</sub> when firing natural gas to agree with current permit limit.

a. while firing natural gas:

0.0134 lb/mmBtu (see Note #2); 10.5 lbs./hour (see note #1); 6 ~~46.0~~ TPY (see note #2); and...

6. Page 7, Condition A.8: Change transition deadline from "09/30/97" to "12/31/98", delete ISO reference, and add 24-hour block averaging consistent with pending construction permit amendment. Change allowable lb/hr and tpy limits following 12/31/98 to agree with current permit limits.

a. while firing natural gas:

up to ~~09/30/97~~ 12/31/98: 25 ppmvd @15% O<sub>2</sub>, 24-hour block average ~~ISO~~ (see note #1);...

by ~~09/30/97~~ 12/31/98: 15 ppmvd @15% O<sub>2</sub>, 24-hour block average ~~ISO~~ (see note #1); ~~131.0~~ 78.6 lbs/hour (see note #2); ~~573.8~~ 344.3 TPY (see note #2);

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6. Page 7, Condition A.8 (continued)

b. while firing distillate fuel oil:

42 ppmvd @15% O<sub>2</sub>, 24-hour block average ISO (see note #1); ...

c. 24-hour block averages:

24-hour block averages are calculated as follows: 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<sub>x</sub> concentrations for all valid monitored operating hours and dividing by the number of hourly average NO<sub>x</sub> 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. CEMS data taken during periods of: startup, shutdown, or malfunction as defined in 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.

7. Page 8, Condition A.15: Add language regarding NO<sub>x</sub> CEMS consistent with the pending construction permit amendment:

...This system shall be accurate to within  $\pm 5.0$  percent and shall be approved by the Administrator. The NO<sub>x</sub> CEMS will be used in lieu of the water/fuel monitoring system and fuel bound nitrogen (FBN) monitoring, which are required in 40 CFR 60.334.

8. Page 9, Condition A.16: Revise condition language to reflect custom fuel monitoring as follows. Note that fuel oil fuel bound nitrogen (FBN) monitoring is not required because the NO<sub>x</sub> CEMS will be used for NSPS Subpart GG excess emissions reporting.

The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. Pursuant to the custom monitoring schedule provisions of 40 CFR 60.334(b)(2), the frequency of determination of these values shall be as follows:

(a) Monitoring of the nitrogen content of distillate fuel oil is not required. Sulfur content of distillate fuel oil shall be determined for each shipment of distillate fuel oil received; and

(b) Monitoring of the nitrogen content of pipeline natural gas is not required. Sulfur content of pipeline natural gas will be based on twice-monthly analyses provided by the natural gas supplier.

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8. Page 9, Condition A.16 (continued)

Remainder of draft condition language to be deleted.

9. Page 9, Condition A.19: Add EPA PM<sub>10</sub> Reference Methods 201 and 201A as optional test methods. Clarify that PM<sub>10</sub> testing is only required for distillate fuel oil-firing.

Particulate matter ten (PM<sub>10</sub>). The test methods for PM<sub>10</sub> emissions, for distillate fuel oil-firing only, shall be Methods 5, 17, 201, or 201A, incorporated by reference in Chapter 62-297, F.A.C.

10. Page 10, Condition A.22. Add language to describe NO<sub>x</sub> test methods for permit limit (i.e., BACT limits) compliance testing.

A.22. a. The owner or operator...

A.22. b. For purposes of demonstrating compliance with the NO<sub>x</sub> emission limits (in lbs/hr and tons/yr) specified in Condition A.8, either EPA Method 20 (at 90 - 100% of permitted maximum capacity load only) or the relative accuracy (RA) test data pursuant to 40 CFR 60 Appendix B Performance Specification 2 Section 7 shall be used. The NO<sub>x</sub> CEMS shall be used for the purpose of demonstrating compliance with the NO<sub>x</sub> emission limit (24-hour block average concentration limit) specified in Condition A.8.

11. Page 10, Condition A.23. ASTM methods cited do not agree with those shown in Subpart GG, 60.335(d). Subpart GG, 60.335(d) lists ASTM D 2880-71 for liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 for the sulfur content of gaseous fuels.

Consistent with the construction permit amendment issued by FDEP on June 17, 1994 and the methods listed in 40 CFR Part 75 and 40 CFR Part 60 Subpart GG, it is requested that ASTM Methods D129-91, D1552-90, D2280-71, D2880-96, D2622-92, D4292, and D4294-90 be included as acceptable methods for determining the sulfur content of liquid fuels.

Consistent with the methods listed in 40 CFR Part 75 and 40 CFR Part 60 Subpart GG, it is requested that ASTM Methods D1072-80, D1072-90, D3031-81, D3246-81, D4084-82, D4468-85, and D5504-94 be included as acceptable methods for determining the sulfur content of natural gas.

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12. Page 10, Condition A.24. ASTM methods specified in 40 CFR 60.335(d) do not include all current methods. Request that the ASTM methods cited above in Condition A.23 also be specified in Condition A.24. Also request deletion of reference to fuel nitrogen content because such analysis is not required - see Comment No. 8 above.
13. Page 11, Condition A.29.a. Request changing range to 90 - 100%. Also, request that condition be changed to clarify that curve labeled "power" on Westinghouse graph is to be used for ambient temperature capacity adjustment.
  - a. This emissions unit shall operate between ~~95~~ 90% and 100% of permitted capacity during the compliance test(s) as adjusted for ambient temperature (compressor inlet temperature) (See W501D5 ECONOPAC SYSTEM PERFORMANCE GRAPH, CURVE LABELED "POWER" - FIGURE 2.
14. Page 12, Condition A.31.(a)c. Delete condition because it is not applicable to APP; i.e., the condition only applies to FDEP staff or agents.
15. Page 13, Condition A.33. Revise testing requirements to be specific for APP; i.e., list specific pollutants which are required to be tested. Re-number requirements under A.33. (a) to be consecutive. Clarify that testing is only required for natural gas combustion; i.e., facility is not authorized to burn fuel oil for more than 400 hours per year. Delete Conditions 4.c. and 10. - not applicable to APP.

**A.33. "Frequency of Compliance Tests.** The following provisions apply only to the combustion turbine system ~~those emissions units and only for the pollutants listed in Conditions A.4 through A.11~~ that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

~~"3 1. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. A compliance test shall be conducted for nitrogen oxides/oxygen, volatile organic compounds, carbon monoxide, and sulfuric acid mist prior to obtaining a renewed operation permit. Compliance testing is only required during the combustion of natural gas fuel. Emission units that..."~~

~~"4 2. During each federal..."~~

a. Visible emissions, ~~if there is an applicable standard~~

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15. Page 13, Condition A.33 (continued)

- b. Delete original b. condition. ~~Carbon monoxide.~~
- c. Delete condition"

"~~5~~ ~~3~~. An annual compliance test..."

"~~9~~ ~~3~~. The owner or operator..."

10. Delete condition

16. Page 14, Condition A.35. Delete condition; testing is already addressed by Condition A.33. Having two conditions that address the same requirement (i.e., compliance testing) is felt to be unnecessary and potentially confusing. Having one condition (i.e., Condition A.33) that describes the specific testing requirements for APP is requested. Note that annual PM<sub>10</sub> testing is not required per Condition A.33.5. Monitoring of SO<sub>2</sub> emissions is addressed via fuel monitoring per Condition A.16. Monitoring of NO<sub>x</sub> emissions is addressed by the NO<sub>x</sub> CEMS per Condition A.22.b.

17. Page 15, Condition A.37. Replace with following condition consistent with pending construction permit amendment:

A.37. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

a. *Nitrogen Oxides.* ~~The NO<sub>x</sub> CEMS will be used in lieu of the water/fuel monitoring system and fuel bound nitrogen (FBN) monitoring, which are required in 40 CFR 60.334. The NO<sub>x</sub> CEMS shall be used to report excess emissions during periods of startup, shutdown, and malfunction in lieu of FBN monitoring and the water/fuel monitoring system described in 40 CFR 60.334(c)(1).~~

Delete original language of A.37.a.

18. Page 17, Condition A.43. Delete condition - this is an historical construction permit requirement that has already been implemented.

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19. Page 17, Condition A.44. Change transition date from September 30, 1997 to December 31, 1998 consistent with pending construction permit amendment.

In order to comply with the lower NO<sub>x</sub> limit by ~~September 30, 1997~~ December 31, 1998, the permittee shall make appropriate combustion technology improvements or install a selective catalytic reduction (SCR) system.

20. Page 18, Subsection B. Change volume of storage tanks from 500,000 to 623,280 gallons:

The facility operates two ~~500,000~~ 623,280 gallon distillate...

21. Page 19, Section IV. Request deletion of all references to NO<sub>x</sub> limits. Section 407 of the CAA (Acid Rain Program) NO<sub>x</sub> requirements only apply to coal-fired facilities and therefore are not applicable to the Auburndale Cogeneration Facility.

22. Appendix E-1. Add the following activities which are listed in FDEP Rule 62-210.300(3), F.A.C. to the list of exempt emission units:

(a) Internal combustion engines in vehicles used for transportation of passengers or freight; and

(b) Equipment used for steam cleaning.

23. Appendix SS-1. Request deletion of this Appendix. APP has existing stack sampling facilities which have been used for testing since 1994. Test data using these stack sampling facilities have been accepted by the FDEP also since 1994. Accordingly, the existing stack sampling facilities are considered to be adequate making Appendix SS-1 unnecessary. Deletion of all references to Appendix SS-1 in the draft Title V is also requested.

24. Table 297.310-1. Request deletion of this table. The table contains a calibration schedule for equipment used in stack sampling and is therefore redundant with the reference methods and procedures cited in Conditions A.18 through A.27.

25. Table 1-1. Although this table does not supersede permit limits, it is requested that it be made consistent with revisions to Condition A.8 as noted above; i.e., deletion of ISO, use of 24-hour block averaging, and change in transition date from 9/30/97 to 12/31/98 for NO<sub>x</sub>.

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26. Table 2-1. Although this table does not supersede compliance monitoring requirements, it is requested that it be made consistent with revisions to Condition A.33 as noted above; i.e., deletion of all testing for fuel oil (facility is not authorized to use oil for more than 400 hours per year), remove "daily" from fuel sulfur monitoring frequency, make ASTM sulfur monitoring citations current for oil and natural gas, and add use of optional relative accuracy (RA) test data pursuant to 40 CFR 60 Appendix B Performance Specification 2 Section 7 for NO<sub>x</sub> compliance testing.
27. Request changes to Appendix TV-1 as follows:
- (1) Delete Condition 57 - it is a duplication of Condition 19.
  - (2) Delete Condition 60 - unconfined PM emissions are already addressed by Section II, Condition 8.
  - (3) Revise Condition 54 as follows:

54. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of ~~a permit issued pursuant to Chapter 62-213, F.A.C., Permit No. 1050221-002-AV~~ shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, ~~provided that the source included such applicable requirements in the permit application.~~ Nothing in ...



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 20, 1997

Mr. Jeff Shaske  
Auburndale Power Partners, Ltd.  
1501 West Derby Avenue  
Auburndale, Florida 33823

Re: DRAFT Title V Permit No. 1050221-002-AV  
Auburndale Cogeneration Facility, Polk County

Dear Mr. Shaske:

In response to your request of yesterday, please find enclosed a computer diskette with an electronic version of the subject permit.

An electronic version of this permit is posted on the Division of Air Resource Management's world wide web site. You can access the web site with the following address: <http://www.dep.state.fl.us/air>. Title V permits are being posted under EPA Review. You can navigate to EPA Review at the DARM site by selecting Air Regulation then Permitting.

If you should have any other questions or comments, please contact me at 904/488-1344.

Sincerely,

Scott M. Sheplak, P.E.  
Professional Engineer  
Title V Section

SMS/bb

Enclosure

copy to:

Thomas W. Davis, P.E., Environmental Consulting & Technology, Inc.

STATE OF FLORIDA, DEP, BUREAU OF AIR REGULATION, TITLE V SECTION  
TELEPHONE CONVERSATION RECORD

TO: ✓ Kile

FROM: SCOTT SHEPLAK

DATE: 02/18/97 TIME: ~ 3p.m.

WITH: Mr. Jeff Shaske

REPRESENTING: Auburndale Power Partners, Ltd. in Auburndale

TELEPHONE NO.: \_\_\_\_\_

SUBJECT: DRAFT Title V Permit No.: 1050221-002-AV  
Auburndale Cogeneration Facility

SUMMARY: Mr. Shaske called to ask what address the  
company needs to mail the proof of publication,  
newspaper affidavit, to. I advised he can mail to  
letterhead address w/ Mail Station #5505 & either to  
CFB or my attention. He plans to fed ex today.

He advised the company will be verifying the permit  
and providing comments. He was very pleased that  
he could read it. I advised that Auburndale is  
the 2nd DRAFT Title V Permit out of BAR-Tallahassee.  
I also advised an electronic version is available if he  
needs one. DRAFT posted on internet site: [http://www.](http://www.dep.state.fl.us/air)  
dep.state.fl.us/air permitting then EPA Review menu.

info. copy Bruce Mitchell

## FLORIDA's Electronic Notification Cover Memorandum

**TO:** Gracy R. Danois, U.S. EPA REGION IV  
**THRU:** R. Bruce Mitchell, Title V Section, Tallahassee *RM*  
**FROM:** Scott M. Sheplak, P.E. *SMS*  
**DATE:** February 7, 1997  
**RE:** U.S. EPA Region IV Title V Operation Permit Review

Pursuant to EPA Region IV's 1996 comprehensive Title V operation permit review strategy contained in the Florida/EPA Implementation Agreement, the following Title V operation permit(s) and associated documents are made available for your review/comment prior to issuance.

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Auburndale Power Partners, Ltd..	Polk	INTERNET	1050221d.zip
<b>DRAFT Permit No.:</b> 1050221-002-AV			

This zipped file contains the following electronic files:

1050221i.doc  
1050221d.doc  
10502211.xls  
10502212.xls  
1050221e.doc  
1050221u.doc  
1050221h.doc

n:\t5permits\bar\1050221\1050221.epa

**FLORIDA'S Permit Application Summary Form**

General Facility Information

Facility name: Auburndale Power Partners, Ltd.

**Facility ID No.:** 1050221

Facility address: 1501 Derby Avenue, Auburndale, Polk County

Date application received: 10/26/95

SIC code of major product: 49

**DRAFT Permit No.:** 1050221-002-AV

Application Type/Permit Activity

Issued on 02/06/97

☐ Initial issuance

☐ General permit

☐ Permit modification

☐ Conditional major

☐ Permit renewal

Facility Emissions Summary Table

{see Table1-1 attached to permit}

Pollutant	Allowable (tpy)
PM	46.0
SO <sub>2</sub>	175.2
NO <sub>x</sub>	573.8
CO	190.5
VOC	26.3
LEAD	not limited
HAP ≥ 10 tpy (by CAS)	not limited

Compliance Summary

☐ Source is out of compliance

☐ Compliance schedule included

☒ Compliance certification signed

Applicable Requirements list

☒ PSD

☐ NESHAPS

☐ Other

☒ NSPS

☐ SIP

Miscellaneous

☒ Acid rain source

☒ Facility subject to 112(r)

☐ Facility applied for federally enforceable emissions cap

☒ Facility provided terms for alternative operating scenarios

☐ One or more emissions unit(s) subject to a MACT standard

☐ One or more emissions unit(s) requested case-by-case 112(g) or (j) determination

☐ Application proposes new control technology

☒ Certified by responsible official

☒ Diagrams or drawings included

☐ Confidential business information (CBI) was received

## PERMIT REVIEW STRATEGY CHECKLIST

FACILITY \_\_\_\_\_ PERMIT NO. \_\_\_\_\_  
AIRS I.D. \_\_\_\_\_ COUNTY: \_\_\_\_\_

Is this submittal being made in response to Section V of the Implementation Agreement? ☒ Yes ☐ No  
If yes, complete the following checklist:

---

EPA PERMIT REVIEW STRATEGY - check all categories that apply.

1. At least one VOC source, one PM source, and one NOx source with respective pollutant emissions in the 90th percentile or higher (ranked annually by permit agency).
2. All municipal waste combustors subject to permitting under section 129(e) of the Clean Air Act.
3. Any source specifically requested by the permit agency.
4. All sources proposing an alternative emission limitation, test method, monitoring requirement, or recordkeeping requirement.
5. Two (2) sources subject to each MACT standard. The permit agency does not need to submit source information for the same MACT standard in ensuing calendar years, unless specifically requested.
6. All sources subject to case-by-case MACT under 112(g); and two sources in a source category subject to case-by-case MACT under 112(j).
7. All sources associated with the early reduction program (40 CFR part 63, subpart D).
- ☒ 8. Submitted in response to special request by EPA Region 4. --- Acid Rain

INFORMATION ATTACHED - paper copies of permit-related documents. Indicate all that apply.

1. Complete permit application (including attachments) and proposed permit.
2. Permit-related information (e.g., public notices, public comments) requested by EPA:
3. Initial permit application (including attachments) from source proposing an alternative emission limitation, test method, monitoring requirement, or recordkeeping requirement. will be submitted Note: initial permit application must be submitted within 10 days of receipt from source.

STATE OF FLORIDA, DEP, BUREAU OF AIR REGULATION, TITLE V SECTION  
TELEPHONE CONVERSATION RECORD

copy to:

John Brown & Al Linero

TO: File

FROM: SCOTT SHEPLAK

DATE: 02/05/97 TIME: ~ 1:45 p.m.

WITH: Mr. Bruce L. Kranco

REPRESENTING: Arbuckle Power Partners, L.P.

TELEPHONE NO.: (703) 222-0445

SUBJECT: returning call from this a.m.

Re: TV DRAFT permit combustion turbine capacity

SUMMARY: Mr. Kranco returned our call from this a.m.

John Brown and I called to ask about  
turbine capacity & testing.

I advised Mr. Kranco that the TV DRAFT  
permit had been sealed by me this a.m.  
and issuance by C.F. pending. § DAY 90 is  
2/6/97 tomorrow.

He brought up the fact that he was meeting  
with Al Linero tomorrow and Tom Davis at  
2 p.m. to discuss their recent letter.

I advised that I would be available to discuss  
TV if needed. I advised that it would be better  
for J.B. the TV Section administrator to respond  
to PSD/AC changes & TV permit. I advised upon  
receipt of the DRAFT TV they can comment if they  
want. We could make necessary changes.