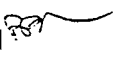


Memorandum

Florida Department of Environmental Protection

TO: Mr. Bill Thomas, P.E.
District Air Permitting Administrator
Southwest District

FROM: Bruce Mitchell 

DATE: November 8, 1996

SUBJECT: Completeness Review of a Response to an Incompleteness Letter
Auburndale Cogeneration Facility: 1050221-002-AV

Enclosed is a response to an incompleteness letter for the above referenced facility regarding an initial application package for a Title V operation permit that is being processed in Tallahassee. Please have someone review the response for completeness and respond in writing (or a Fax followed by a hard copy) by December 4, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Scott Sheplak, at 904/488-1344 or SC:278-1344.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

Enclosure

cc: Mr. Jerry Kissel, P.E., SWD

C:\Personal\Memos\T5incrw1.mem

- the original -

AUBURNDALE POWER PARTNERS, LIMITED PARTNERSHIP

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

Telephone: (703) 222-0445 • Fax: (703) 227-0516

November 6, 1996

LTR.APP0048

Mr. John C. Brown, Jr., P.E.
Administrator, Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

NOV 08 1996

BUREAU OF
AIR REGULATION

**Re: Auburndale Cogeneration Facility
Title V Permit Application**

Dear Mr. Brown:

The following information is provided in response to your correspondence dated August 12, 1996, regarding the Title V permit application submitted by Auburndale Power Partners, Limited Partnership (APP) to the Florida Department of Environmental Protection (FDEP) on October 26, 1995.

1. Exempt, Unregulated, and Trivial Emission Units and/or Activities

As noted in your 8/12/96 letter, the FDEP procedures for classifying emission units and/or activities as exempt, unregulated, or trivial were revised following the submittal of APP's Title V permit application in October 1995. As requested, the list of insignificant activities contained in the original October 1995 permit application (provided as electronic file D_IID7.WP6) has been updated to be consistent with current procedures. A revised list (one hard copy) of exempt and unregulated emission units and/or activities is enclosed in Appendix A. An updated electronic submittal (in quadruplicate) is included in Appendix G that contains revised file D_IID7.WP6.

2. Emission Estimates

Emission estimates for the APP cogeneration facility have been revised in accordance with current FDEP Title V application procedures. Specifically, all potential emission rates shown in the revised application are based on allowable emission rates; i.e., use of emissions method code 0 in Field 9 of Section E, Pollutant Potential/Estimated Emissions. This method code was not available at the time of APP's initial Title V permit application submittal in October 1995. The use of allowable emission rates obviates the need for references to emission factors in the application and for the emission rate calculations previously provided in Appendix C of the October 1995 submittal. A revised report (one hard copy) of Section E for Emission Unit ID E.U. 1 (Combustion Turbine No. 1) is enclosed in Appendix B. An updated electronic

submittal, prepared using ELSA Version 1.3b, is also included (in quadruplicate) in Appendix G. APP requests that FDEP disregard the now obsolete Appendix C of the October 1995 permit application.

3. CT-Specific Graph

As requested, a graph (in quadruplicate) showing the relationship between ambient temperature and heat input for the APP Westinghouse 501D combustion turbine is enclosed in Appendix C.

4. P.E. Certification Statement

As indicated in your 8/12/96 letter, the required Professional Engineer (P.E.) certification language has been changed by FDEP following the submittal of APP's Title V permit application in October 1995. A current signed and sealed P.E. certification is enclosed (in quadruplicate) in Appendix D. Exceptions to the original project design were noted in the Construction/Modification Information section of the October 1995 application. As requested, these exceptions are provided instead on the enclosed list following the P.E. certification statement.

5. Acid Rain Requirements

Notification that Mr. Franco replaced Mr. Fields as APP's Designated Representative for Acid Rain Program purposes was provided to EPA in correspondence dated April 29, 1996. One copy of APP's submittal to EPA is enclosed in Appendix E as requested.

6. General Updates

One hard copy of general updates to APP's Title V application reflecting administrative changes (phone numbers, zip codes, etc) and ELSA Version 1.3b are enclosed in Appendix F. A complete updated electronic submittal (in quadruplicate) is also included.

Please call Axel Santiago or me at (941) 965-1561 if you have any further questions or comments regarding the Auburndale Cogeneration Facility Title V permit application.

Very truly yours,



Bruce L. Franco, P.E.
Designated Representative
Auburndale Cogeneration Facility

BLF:pm

cc: Mr. Louis Nichols, FDEP
Mr. Tom Davis, ECT
Dave Sanches, APP
Mr. Axel Santiago, APP

XC: SWD
11/8/96

APPENDIX A

EXEMPT AND UNREGULATED EMISSION UNITS AND/OR ACTIVITIES

Auburndale Cogeneration Facility
List of Exempt Activities (Page 1 of 1)

Activity ¹	Basis
Comfort heating with a gross maximum heat input of less than one million Btu per hour.	Rules 62-210.300(3)(a)4. and 62-213.430(6),F.A.C.
Internal combustion engines in vehicles used for transportation of passengers or freight.	Rules 62-210.300(3)(a)9. and 62-213.430(6),F.A.C.
Vacuum pumps in laboratory operations	Rules 62-210.300(3)(a)9. and 62-213.430(6),F.A.C.
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.	Rules 62-210.300(3)(a)11. and 62-213.430(6),F.A.C.
Equipment used exclusively for space heating, other than boilers.	Rules 62-210.300(3)(a)12. and 62-213.430(6),F.A.C.
Equipment used for steam cleaning	Rules 62-210.300(3)(a)10. and 62-213.430(6),F.A.C.
Equipment used exclusively for space heating, other than boilers	Rules 62-210.300(3)(a)12. and 62-213.430(6),F.A.C.
Laboratory equipment used exclusively for chemical or physical analyses (including fume hoods and vents)	Rules 62-210.300(3)(a)15. and 62-213.430(6),F.A.C.
Fire and safety equipment	Rules 62-210.300(3)(a)22. and 62-213.430(6),F.A.C.
Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.	Rules 62-210.300(3)(a)24. and 62-213.430(6),F.A.C.
Degreasing units using heavier-than-air vapors exclusively, except any unit using or emitting any substance classified as a hazardous air pollutant	Rules 62-210.300(3)(a)26. and 62-213.430(6),F.A.C.
No. 2 Fuel Oil Truck Unloading Equipment	Rule 62-213.430(6),F.A.C.
Oil/Water Separators	Rule 62-213.430(6),F.A.C.
Fresh Water Cooling Towers	Rule 62-213.430(6),F.A.C.
Refrigeration Units	Rule 62-213.430(6),F.A.C.
Lube Oil Vents Associated with Rotating Equipment	Rule 62-213.430(6),F.A.C.
Lube Oil Tank Vents	Rule 62-213.430(6),F.A.C.

¹ "Trivial activities", as listed in the Division of Air Resources Management guidance document DARM-PER/V-15, revised March 15, 1996, have been excluded from the Title V permit application as directed by this document.

Auburndale Cogeneration Facility
List of Unregulated Activities (Page 1 of 1)

Activity	Basis
One or more emergency generators which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.	Rule 62-210.300(3)(a)20., F.A.C.
One or more heating units and general purpose internal combustion engines which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.	Rule 62-210.300(3)(a)21, F.A.C
Surface coating operations utilizing 6.0 gallons per day or less, averaged monthly, of coatings containing greater than 5.0 percent VOCs, by volume.	Rule 62-210.300(3)(a)23., F.A.C.

Source: ECT, 1996.

APPENDIX B

SECTION E FOR EMISSION UNIT ID EU 1

III. EMISSIONS UNIT INFORMATION

A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1

Combustion Turbine #1

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one :

- ☒ [X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- ☐ [] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one :

- ☒ [X] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- ☐ [] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- ☐ [] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

III. Part 1 - 1

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1
 Combustion Turbine #1

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
1 - NOX	028		EL
2 - VOC			EL
3 - CO			EL
4 - PM10			EL
5 - SO2			EL
6 - H015			EL
7 - H021			EL
8 - H114			EL
9 - SAM			EL
10 - PB			EL
11 - FL			EL
12 - PM			NS

III. Part 9a - 1

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 1

1. Pollutant Emitted : NOX			
2. Total Percent Efficiency of Control : 75.00 %			
3. Potential Emissions : <div style="text-align: right; padding-right: 50px;">230.00 lb/hour 593.20 tons/year</div>			
4. Synthetically Limited? [X] Yes [] No			
5. Range of Estimated Fugitive/Other Emissions: <div style="text-align: right; padding-right: 50px;">to tons/year</div>			
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on prorated combustion of natural gas (8,360 hrs/yr) and No. 2 fuel oil (400 hrs/yr). Use of No. 2 oil is limited to 400 hrs/yr.			

III. Part 9b - 1

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 1

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		25.00	ppmvd @ 15% O2
4. Equivalent Allowable Emissions :		131.00	lb/hour
		573.80	tons/year
5. Method of Compliance : Annual test using EPA Reference Method 20.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).			

III. Part 9c - 1

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 1

Allowable Emissions 2

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		15.00	ppmvd @ 15% O2
4. Equivalent Allowable Emissions :			
	78.60	lb/hour	344.30 tons/year
5. Method of Compliance :			
Annual test using EPA Reference Method 20.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :			
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing. Emission limits becomes effective 9/30/97. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT)			

III. Part 9c - 4

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 1

Allowable Emissions 3

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		42.00	ppmvd @ 15% O2
4. Equivalent Allowable Emissions :			
	230.00	lb/hour	46.00 tons/year
5. Method of Compliance :			
None required per FDEP policy.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :			
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil firing. Firing of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT)			

III. Part 9c - 5

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 2

1. Pollutant Emitted : VOC			
2. Total Percent Efficiency of Control : 0.00 %			
3. Potential Emissions : <div style="text-align: right; padding-right: 50px;">10.00 lb/hour 27.10 tons/year</div>			
4. Synthetically Limited? [X] Yes [] No			
5. Range of Estimated Fugitive/Other Emissions: <div style="text-align: right; padding-right: 50px;">to tons/year</div>			
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on prorated combustion of natural gas (8,360 hrs/yr) and No. 2 fuel oil (400 hrs/yr). Use of No. 2 fuel oil is limited to 400 hrs/yr.			

III. Part 9b - 2

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 2

Allowable Emissions 1

1. Basis for Allowable Emissions Code :					RULE				
2. Future Effective Date of Allowable Emissions :									
3. Requested Allowable Emissions and Units :									
4. Equivalent Allowable Emissions :									
					6.00	lb/hour	26.30	tons/year	
5. Method of Compliance :									
Annual calc. using emission factors and fuel consumption.									
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :									
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).									

III. Part 9c - 6

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 2

Allowable Emissions 2

1. Basis for Allowable Emissions Code :	RULE		
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :			
4. Equivalent Allowable Emissions :	10.00	lb/hour	2.00 tons/year
5. Method of Compliance :	None required per FDEP policy .		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :	Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil-firing. Use of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).		

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 3

1. Pollutant Emitted : CO			
2. Total Percent Efficiency of Control : 0.00 %			
3. Potential Emissions :			
73.00	lb/hour	196.40	tons/year
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions:			
		to	tons/year
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions :			
N/A			
9. Pollutant Potential/Estimated Emissions Comment :			
<div style="padding-left: 20px;">Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on prorated combustion of natural gas (8,360 hrs/yr) and No. 2 fuel oil (400 hrs/yr). Use of No. 2 oil is limited to 400 hrs/yr</div>			

III. Part 9b - 3

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 3

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		15.00	ppmvd
4. Equivalent Allowable Emissions :		43.50	lb/hour
		190.50	tons/year
5. Method of Compliance : Annual test using EPA Reference Method 10.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing at base load. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).			

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 3

Allowable Emissions 2

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		21.00	ppmvd
4. Equivalent Allowable Emissions :		43.50	lb/hour
		190.50	tons/year
5. Method of Compliance : Annual test using EPA Reference Method 10.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing at minimum load. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).			

III. Part 9c - 8

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 3

Allowable Emissions 3

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		25.00	ppmvd
4. Equivalent Allowable Emissions :		73.00	lb/hour
		14.60	tons/year
5. Method of Compliance : None required per FDEP policy.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil-firing. Use of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).			

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 4

1. Pollutant Emitted : PM10			
2. Total Percent Efficiency of Control :		0.00	%
3. Potential Emissions :		36.80	lb/hour 51.30 tons/year
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions:			to tons/year
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on prorated combustion of natural gas (8,360 hrs/yr) and No. 2 fuel oil (400 hrs/yr). Operation on No. 2 oil is limited to 400 hrs/yr. PM10 emissions assumed to be equivalent to PM emissions.			

III. Part 9b - 4

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 4

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	RULE		
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :			
4. Equivalent Allowable Emissions :	10.50	lb/hour	46.00 tons/year
5. Method of Compliance :	Annual test using EPA Reference Method 5 or 17 is waived.		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :	<p>Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT). Annual testing is waived as long as opacity emissions do not exceed 10 percent per Specific Condition No. 9 of Permit AC53-208321.</p>		

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 4

Allowable Emissions 2

1. Basis for Allowable Emissions Code :	RULE
2. Future Effective Date of Allowable Emissions :	
3. Requested Allowable Emissions and Units :	
4. Equivalent Allowable Emissions :	
	36.80 lb/hour 7.36 tons/year
5. Method of Compliance :	
	None required per 62-297.310(7)((a)(5., F.A.C.
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :	
	Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil-firing. Use of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 5

1. Pollutant Emitted : SO ₂			
2. Total Percent Efficiency of Control : 0.00 %			
3. Potential Emissions :			
70.00	lb/hour	181.20	tons/year
4. Synthetically Limited?			
[X] Yes [] No			
5. Range of Estimated Fugitive/Other Emissions:			
	to		tons/year
6. Emissions Factor :			
Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions :			
N/A			
9. Pollutant Potential/Estimated Emissions Comment :			
<p>Potential emissions set equal to allowable emissions.</p> <p>Hourly emission rate based on No. 2 fuel oil combustion.</p> <p>Annual emissions based on prorated combustion of natural gas (8,360 hrs/yr) and No. 2 fuel oil (400 hrs/yr).</p> <p>Use of No. 2 oil is limited to 400 hrs/yr.</p>			

III. Part 9b - 5

DEP Form No. 62-210.900(1) - Form

Effective : 3-21-96

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 5

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	RULE
2. Future Effective Date of Allowable Emissions :	
3. Requested Allowable Emissions and Units :	
4. Equivalent Allowable Emissions :	
	40.00 lb/hour 175.20 tons/year
5. Method of Compliance :	
	Annual calculation using 0.0006 lb SO ₂ /MMBtu emission factor.
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :	
	Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).

III. Part 9c - 10

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 5

Allowable Emissions 2

1. Basis for Allowable Emissions Code :	RULE		
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :			
4. Equivalent Allowable Emissions :	70.00	lb/hour	14.00 tons/year
5. Method of Compliance :	None required per FDEP policy.		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :	Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil-firing. Use of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).		

III. Part 9c - 17

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 6

1. Pollutant Emitted : H015			
2. Total Percent Efficiency of Control : 0.00 %			
3. Potential Emissions : <div style="text-align: right; padding-right: 50px;">0.20 lb/hour 0.04 tons/year</div>			
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <div style="text-align: right; padding-right: 50px;">to tons/year</div>			
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on combustion of No. 2 fuel oil (400 hrs/yr).			

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 6

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		0.00	lb/MMBtu
4. Equivalent Allowable Emissions :			
	0.20	lb/hour	0.04 tons/year
5. Method of Compliance : None required per FDEP policy.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 fuel oil firing. Use of No. 2 oil limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).			

III. Part 9c - 2

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 7

1. Pollutant Emitted : H021			
2. Total Percent Efficiency of Control :		0.00	%
3. Potential Emissions :		0.00	lb/hour 0.00 tons/year
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions:		to	tons/year
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on combustion of No. 2 fuel oil (400 hrs/yr).			

III. Part 9b - 7

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 7

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		RULE			
2. Future Effective Date of Allowable Emissions :					
3. Requested Allowable Emissions and Units :		0.00	lb/MMBtu		
4. Equivalent Allowable Emissions :		0.00	lb/hour	0.00	tons/year
5. Method of Compliance :					
None required per FDEP letter dated June 17, 1994.					
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :					
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 fuel oil firing. Use of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).					

III. Part 9c - 3

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 8

1. Pollutant Emitted : H114			
2. Total Percent Efficiency of Control : 0.00 %			
3. Potential Emissions : <div style="text-align: right; padding-right: 50px;">0.00 lb/hour 0.01 tons/year</div>			
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <div style="text-align: right; padding-right: 50px;">to tons/year</div>			
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on prorated combustion of natural gas (8,360 hrs/yr) and No. 2 fuel oil (400 hrs/yr).			

III. Part 9b - 8

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 8

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		OTHER	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		0.00	lb/MMBtu
4. Equivalent Allowable Emissions :			
	0.00	lb/hour	0.06 tons/year
5. Method of Compliance :			
None required per FDEP letter dated June 17, 1994.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :			
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing. No underlying FDEP rule.			

III. Part 9c - 12

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 8

Allowable Emissions 2

1. Basis for Allowable Emissions Code :		OTHER			
2. Future Effective Date of Allowable Emissions :					
3. Requested Allowable Emissions and Units :		0.00	lb/MMBtu		
4. Equivalent Allowable Emissions :					
		0.00	lb/hour	0.00	tons/year
5. Method of Compliance :					
None required by FDEP letter dated June 17, 1994.					
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :					
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil-firing. Use of No. 2 oil is limited to 400 hrs/yr. No underlying FDEP rule.					

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 9

1. Pollutant Emitted : SAM			
2. Total Percent Efficiency of Control : 0.00 %			
3. Potential Emissions :	14.00	lb/hour	34.20 tons/year
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions: <div style="text-align: right;">to tons/year</div>			
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil firing. Annual emissions based on prorated combustion of natural gas (8,360 hrs/yr) and No. 2 fuel oil (400 hrs/yr).			

III. Part 9b - 9

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 9

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	RULE		
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :			
4. Equivalent Allowable Emissions :	7.50	lb/hour	32.90 tons/year
5. Method of Compliance :	Annual calc. using emission factor and fuel consumption.		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :	Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during natural gas firing. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).		

III. Part 9c - 11

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 9

Allowable Emissions 2

1. Basis for Allowable Emissions Code :	RULE
2. Future Effective Date of Allowable Emissions :	
3. Requested Allowable Emissions and Units :	
4. Equivalent Allowable Emissions :	
	14.00 lb/hour 2.80 tons/year
5. Method of Compliance :	
	None required per FDEP policy.
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :	
	Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil-firing. Use of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 10

1. Pollutant Emitted : PB			
2. Total Percent Efficiency of Control : 0.00 %			
3. Potential Emissions : <div style="text-align: right; padding-right: 50px;">0.13 lb/hour 0.03 tons/year</div>			
4. Synthetically Limited? [X] Yes [] No			
5. Range of Estimated Fugitive/Other Emissions: <div style="text-align: right; padding-right: 50px;">to tons/year</div>			
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on combustion of No. 2 fuel oil (400 hrs/yr).			

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 10

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		RULE	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		0.00	lb/MMBtu
4. Equivalent Allowable Emissions :			
		0.13	lb/hour
		0.03	tons/year
5. Method of Compliance :			
None required per FDEP policy.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :			
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 oil firing. Use of No. 2 oil is limited to 400 hrs/yr. FDEP Rule 62-212.400(5)(c), F.A.C., (BACT).			

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1

Pollutant Potential/Estimated Emissions : Pollutant 11

1. Pollutant Emitted : FL			
2. Total Percent Efficiency of Control :		0.00	%
3. Potential Emissions :		0.04	lb/hour 0.01 tons/year
4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
5. Range of Estimated Fugitive/Other Emissions:		to tons/year	
6. Emissions Factor : Reference :			
7. Emissions Method Code : 0			
8. Calculations of Emissions : N/A			
9. Pollutant Potential/Estimated Emissions Comment : Potential emissions set equal to allowable emissions. Hourly emission rate based on No. 2 fuel oil combustion. Annual emissions based on combustion of No. 2 fuel oil (400 hrs/yr).			

III. Part 9b - 11

Emissions Unit Information Section 1
Combustion Turbine #1

Pollutant Information Section 11

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		OTHER	
2. Future Effective Date of Allowable Emissions :			
3. Requested Allowable Emissions and Units :		0.00	lb/MMBtu
4. Equivalent Allowable Emissions :			
	0.04	lb/hour	0.01 tons/year
5. Method of Compliance :			
None required per FDEP policy.			
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) :			
Per Specific Condition No. 1 of Permit AC53-208321. Emission limits applicable during No. 2 fuel oil firing. Use of No. 2 fuel oil is limited to 400 hrs/yr. No underlying FDEP rule.			

III. Part 9c - 20

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine #1.

Pollutant Potential/Estimated Emissions : Pollutant 12

1. Pollutant Emitted : PM		
2. Total Percent Efficiency of Control :		%
3. Potential Emissions :		
lb/hour		tons/year
4. Synthetically Limited? [] Yes [] No		
5. Range of Estimated Fugitive/Other Emissions:		
	to	tons/year
6. Emissions Factor : Reference :		
7. Emissions Method Code :		
8. Calculations of Emissions :		
9. Pollutant Potential/Estimated Emissions Comment :		

APPENDIX C

CT SPECIFIC GRAPH

W501D5 ECONOPAC SYSTEM PERFORMANCE

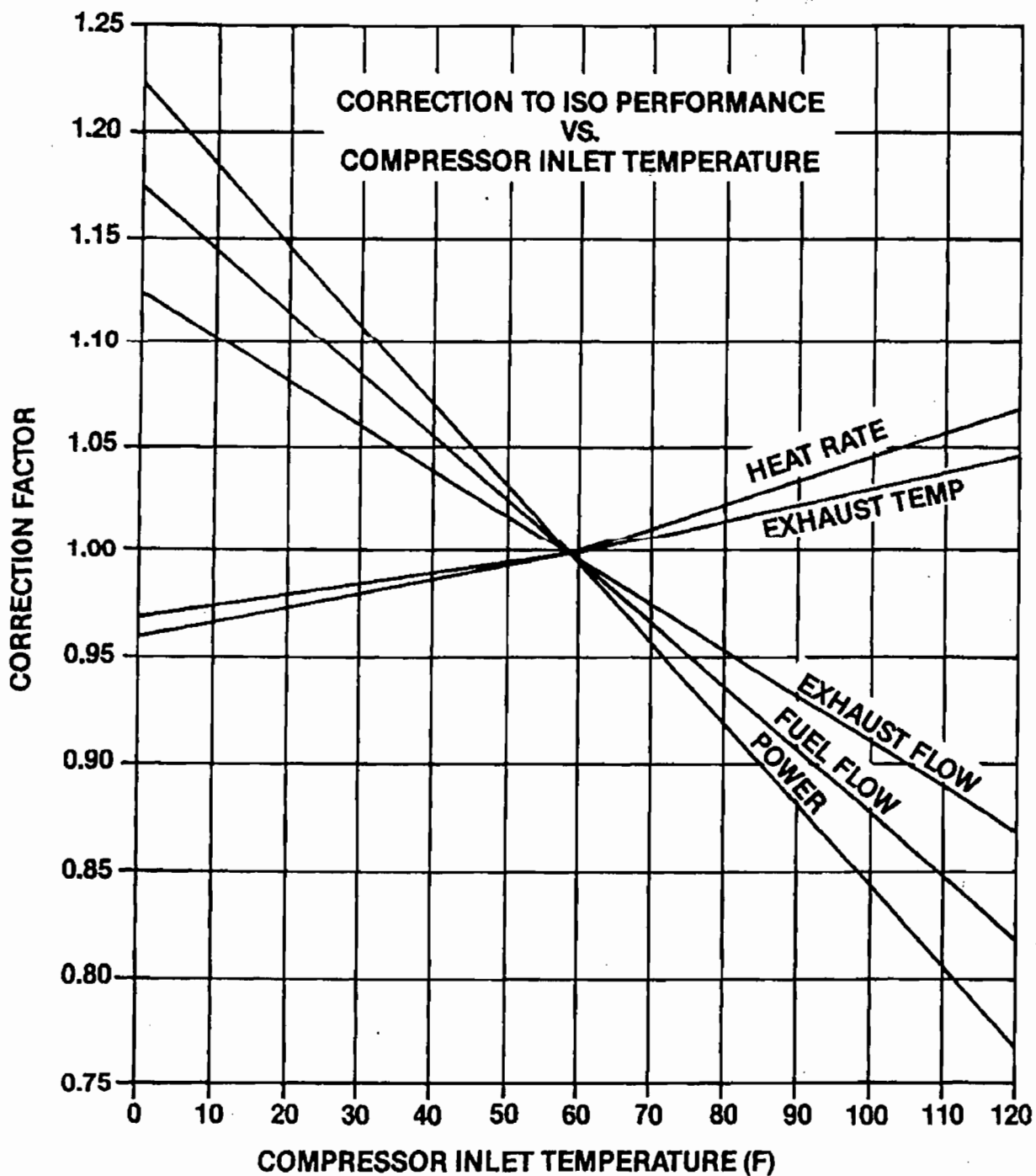


FIGURE 2

AUBURNDALE COGENERATION PROJECT

REVISED WARRANTED PLANT PERFORMANCE, NATURAL GAS OPERATION

Westinghouse Proprietary Information

**WESTINGHOUSE ELECTRIC CORPORATION
POWER GENERATION BUSINESS UNIT - ORLANDO, FL**

Issue Date:

Page: 56 of 57

TITLE: AUBURNDALE TEST CORRECTIONS

DOCUMENT NO. 21T6007

DISTRIBUTION CODE: 242-000-603

TYPE	REV
EDD	001

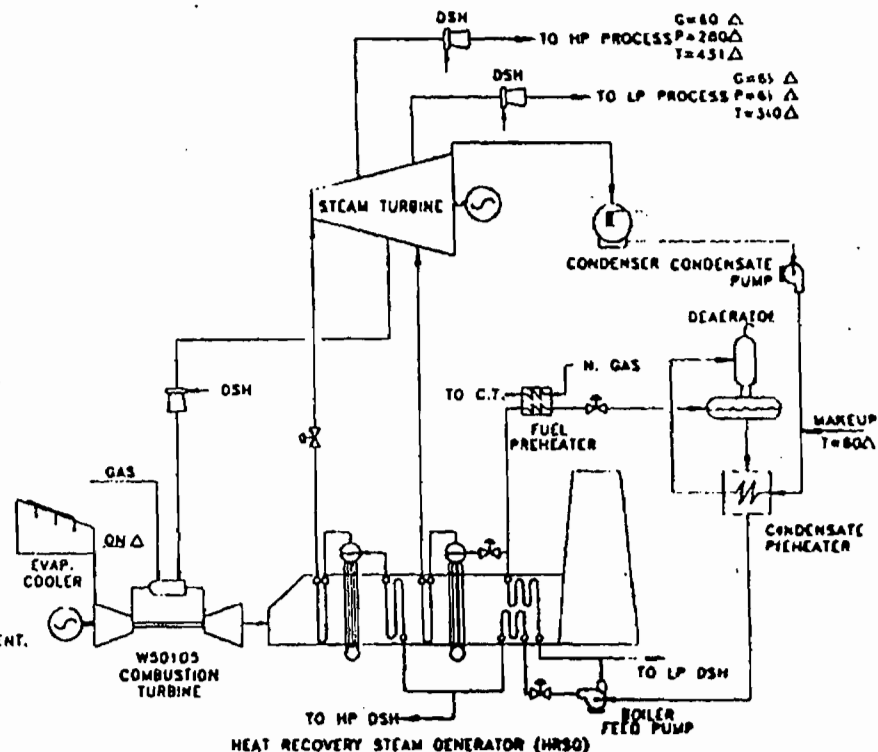
This drawing contains information proprietary to Westinghouse Electric Corporation. It is submitted in confidence and is to be used solely for the purpose for which it is furnished and returned upon request. This drawing and such information is not to be reproduced, transmitted, disclosed or used in whole or in part without the written authorization of Westinghouse Electric Corporation. Proprietary Class No. _____

WESTINGHOUSE ELECTRIC CORP. 743 000 603

AMBIENT TEMPERATURE	59 °F	Δ
RELATIVE HUMIDITY	60 %	Δ
BAROMETRIC PRESSURE	14.7 PSIA	Δ
FUEL TYPE	NATURAL GAS	Δ
FUEL HEATING VALUE, LHV	19780 BTU/LB	Δ
GENERATOR POWER FACTOR	0.9	Δ

GT POWER	120520 KW
ST POWER	38708 KW
GROSS POWER	158728 KW
AUX LOADS AND LOSSES	4317 KW
NET POWER	154411 KW*
TOTAL FUEL INPUT, LHV	1179.5 MMBTU/HR
NET PLANT HEAT RATE, LHV	7639 BTU/KW-HR*
STACK NOX EMISSION	23 PPMVD*

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NOW EMISSIONS ARE BASED ON 15% O₂ AND ISO CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 90% CH₄, 5% C₂H₆ AND 5% N₂.
6. PERFORMANCE BASED ON NATURAL GAS WITH A MAXIMUM SULFUR CONTENT OF 0.2 GRAINS/100 SCF.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



1955-56

P = PRESSURE, PSIA
T = TEMPERATURE, °F
Q = FLOW, 1000 LB/HR
H = ENTHALPY, BTU/LB

WESTINGHOUSE PROPRIETARY

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO WESTINGHOUSE ELECTRIC CORPORATION. IT IS SUBMITTED IN CONFIDENCE AND IS TO BE USED ONLY FOR THE PURPOSE FOR WHICH IT IS FURNISHED AND RETURNED UPON REQUEST. THIS DRAWING AND SUCH INFORMATION IS NOT TO BE REPRODUCED, TRANSMITTED, DISCLOSED, OR USED OTHERWISE, IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WESTINGHOUSE ELECTRIC CORPORATION.

AUBURNDALE COGENERATION PROJECT			
DATE 06/21/93	MEETING 2:00PM	BY (S)	Atty/Gen'l Ctrk's Corporation Power Generation Projects Division
PROJECT A. 17500		WARRANTED PLANT PERFORMANCE NATURAL GAS, 59F, STEAM INJ. 1X1 W30105 COMBINED CYCLE PLANT	
DESIGNED BY J. ALBA			
REV. DATE	REV. DESC		
2	B		
DRAWN BY M. J. P. 1		Drawing No. W30105 Date Page 1 of 1	

AUBURNDALE COGENERATION PROJECT

REVISED WARRANTED PLANT PERFORMANCE, OIL OPERATION

OPERATING CONDITIONS:

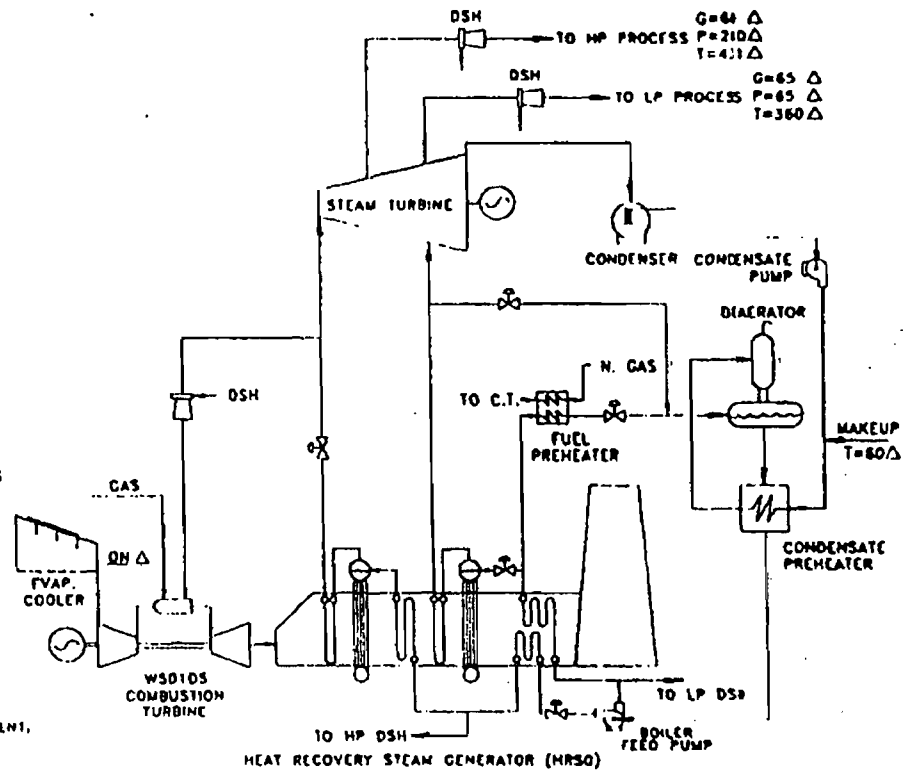
AMBIENT TEMPERATURE 59 °F Δ
 RELATIVE HUMIDITY 60 % Δ
 BAROMETRIC PRESSURE 14.7 PSIA Δ
 FUEL TYPE #2 DISTILLATE OIL Δ
 FUEL HEATING VALUE, LHV 18200 BTU/LB Δ
 GENERATOR POWER FACTOR 0.9 Δ

EST. PLANT PERFORMANCE DATA:

CT POWER 120430 KW
 ST POWER 31957 KW
 GROSS POWER 152387 KW
 AUX LOADS AND LOSSES 4823 KW
 NET POWER 147764 KW
 TOTAL FUEL INPUT, LHV 1188.3 MMBTU/HR
 NET PLANT HEAT RATE, LHV 8042 BTU/KW-HR
 STACK NOX EMISSION 42 PPMVD

NOTES:

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NOX EMISSIONS ARE BASED ON 15% O₂ AND ISO CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 86% C, 13.77% H, 0.2% S, 0.015% FBN, 0.01% ASH.
6. PERFORMANCE BASED ON DISTILLATE OIL WITH A MAXIMUM SULFUR CONTENT OF 0.05% AND 0.01% FUEL BOUND NITROGEN.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



LEGEND:
 P = PRESSURE, PSIA
 T = TEMPERATURE, °F
 Q = FLOW, 1000 LB/HR
 H = ENTHALPY, BTU/LB

WESTINGHOUSE PROPRIETARY

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO WESTINGHOUSE ELECTRIC CORPORATION. IT IS SUBMITTED IN CONFIDENCE AND IS TO BE USED SOLELY FOR THE PURPOSE FOR WHICH IT IS FURNISHED AND RETURNED UPON REQUEST. THIS DRAWING AND SUCH INFORMATION IS NOT TO BE REPRODUCED, TRANSMITTED, DISCLOSED, OR USED OTHERWISE, IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WESTINGHOUSE ELECTRIC CORPORATION.

AUBURNDALE COGENERATION PROJECT			
DATE: 06/11/93	DESIGN: 6.0000	BY: [Signature]	Westinghouse Electric Corporation Power Generation Projects Division
CH: PTD08	SCALE: 1" = 10'-0"	DATE: 06/11/93	WARRANTED PLANT PERFORMANCE OIL, 59°F, STEAM INJ. 1X1 WS0105 COMBINED CYCLE PLANT
BY: J. ALBA	DATE: 06/11/93	DATE: 06/11/93	
CAD NO. HP1205.2	Drawing No. PTC0375081	Page 2 of 2	

This drawing contains information proprietary to Westinghouse Electric Corporation. It is submitted in confidence and is to be used solely for the purpose for which it is furnished and returned upon request. This drawing and such information is not to be reproduced, transmitted, disclosed or used in whole or in part without the written authorization of Westinghouse Electric Corporation. Proprietary Class No. _____

DOCUMENT NO. 2116007

TITLE: AUBURNDALE TEST CORRECTIONS

DISTRIBUTION CODE: 242-000-603

TYPE	REV
EDD	001



WESTINGHOUSE ELECTRIC CORPORATION
POWER GENERATION BUSINESS UNIT - ORLANDO, FL

Issue Date:

Page: 57 of 57

EC-94208

A10-5R

Westinghouse Documentation Information

W501D5 ECONOPAC SYSTEM PERFORMANCE

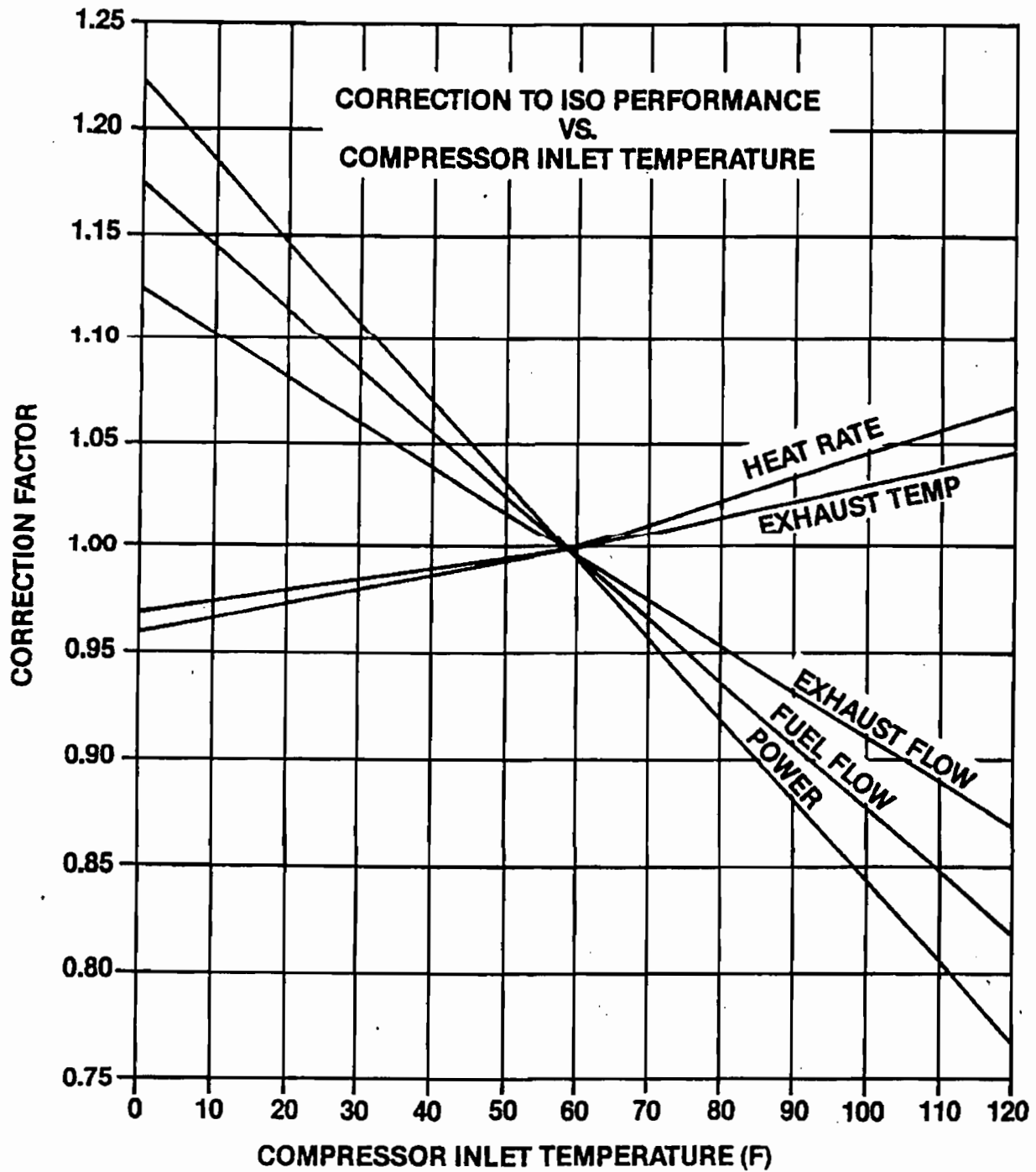


FIGURE 2

BEST AVAILABLE COPY

AUBURNDALE COGENERATION PROJECT

REVISED WARRANTED PLANT PERFORMANCE, NATURAL GAS OPERATION

OPERATING CONDITIONS:

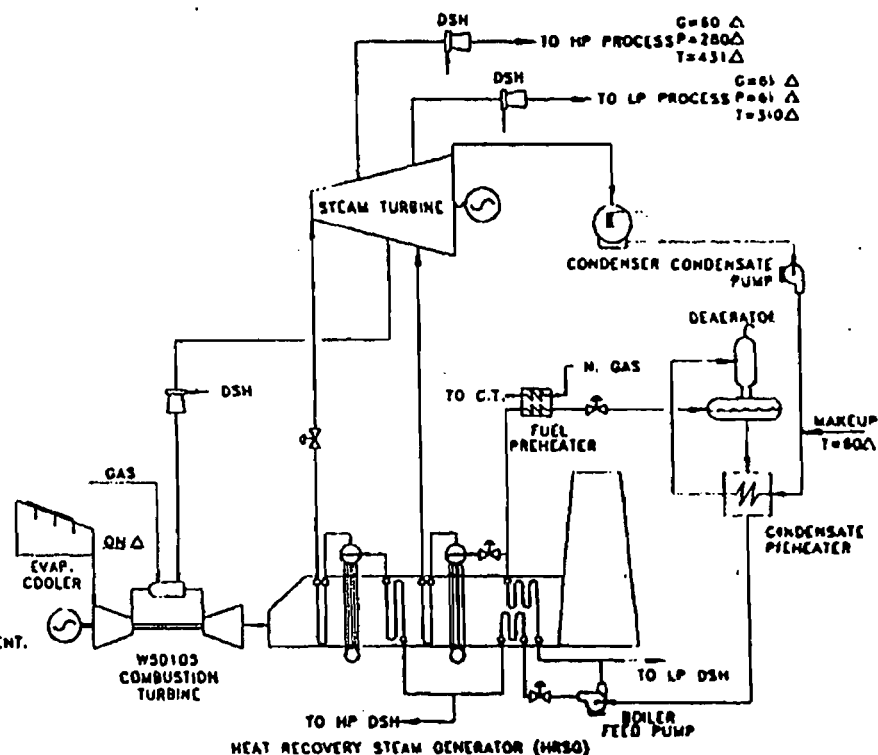
AMBIENT TEMPERATURE 59 °F Δ
 RELATIVE HUMIDITY 60 % Δ
 BAROMETRIC PRESSURE 14.7 PSIA Δ
 FUEL TYPE NATURAL GAS Δ
 FUEL HEATING VALUE, LHV 19780 BTU/LB Δ
 GENERATOR POWER FACTOR 0.9 Δ

EST. PLANT PERFORMANCE DATA:

CT POWER 120520 KW
 ST POWER 38708 KW
 GROSS POWER 159228 KW
 AUX LOADS AND LOSSES 4317 KW
 NET POWER 154911 KW
 TOTAL FUEL INPUT, LHV 1179.5 MMBTU/HR
 NET PLANT HEAT RATE, LHV 7839 BTU/KW-HR
 STACK NOX EMISSION 25 PPMV

NOTES:

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NOx EMISSIONS ARE BASED ON 15% O₂ AND ISO CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 90% CH₄, 5% C₂H₆ AND 5% N₂.
6. PERFORMANCE BASED ON NATURAL GAS WITH A MAXIMUM SULFUR CONTENT OF 0.2 GRAMS/100 SCF.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



LEGEND:
 P = PRESSURE, PSIA
 T = TEMPERATURE, °F
 G = FLOW, 1000 LB/HR
 H = ENTHALPY, BTU/LB

WESTINGHOUSE PROPRIETARY

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO WESTINGHOUSE ELECTRIC CORPORATION. IT IS SUBMITTED IN CONFIDENCE AND IS TO BE USED SOLELY FOR THE PURPOSE FOR WHICH IT IS FURNISHED AND RETURNED UPON REQUEST. THIS DRAWING AND SUCH INFORMATION IS NOT TO BE REPRODUCED, TRANSMITTED, DISCLOSED, OR USED OTHERWISE, IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WESTINGHOUSE ELECTRIC CORPORATION.

AUBURNDALE COGENERATION PROJECT			
DATE	06/01/93	REVISED	0.0000
DESIGNED BY	A. P. P. 0000	CHECKED BY	A. ALBA
APPROVED BY		DATE	
CAD FILE	060101.d	Drawing No.	PCS070001
WARRANTED PLANT PERFORMANCE NATURAL GAS, 59°F, STEAM 1X1, 1X1 W50103 COMBINED CYCLE PLANT		Page 1 of 2	

This drawing contains information proprietary to Westinghouse Electric Corporation. It is submitted in confidence and is to be used solely for the purpose for which it is furnished and returned upon request. This drawing and such information is not to be reproduced, transmitted, disclosed or used in whole or in part without the written authorization of Westinghouse Electric Corporation. Proprietary Class No.

DOCUMENT NO. 2176007

TITLE: AUBURNDALE TEST CORRECTIONS

DISTRIBUTION CODE: 242-000-603

TYPE	REV
EDD	001



WESTINGHOUSE ELECTRIC CORPORATION
POWER GENERATION BUSINESS UNIT - ORLANDO, FL

Issue Date:

Page: 56 of 57

EC-94208

A10-57

Westinghouse Proprietary Information

BEST AVAILABLE COPY

AUBURNDALE COGENERATION PROJECT

REVISED WARRANTED PLANT PERFORMANCE, OIL OPERATION

OPERATING CONDITIONS:

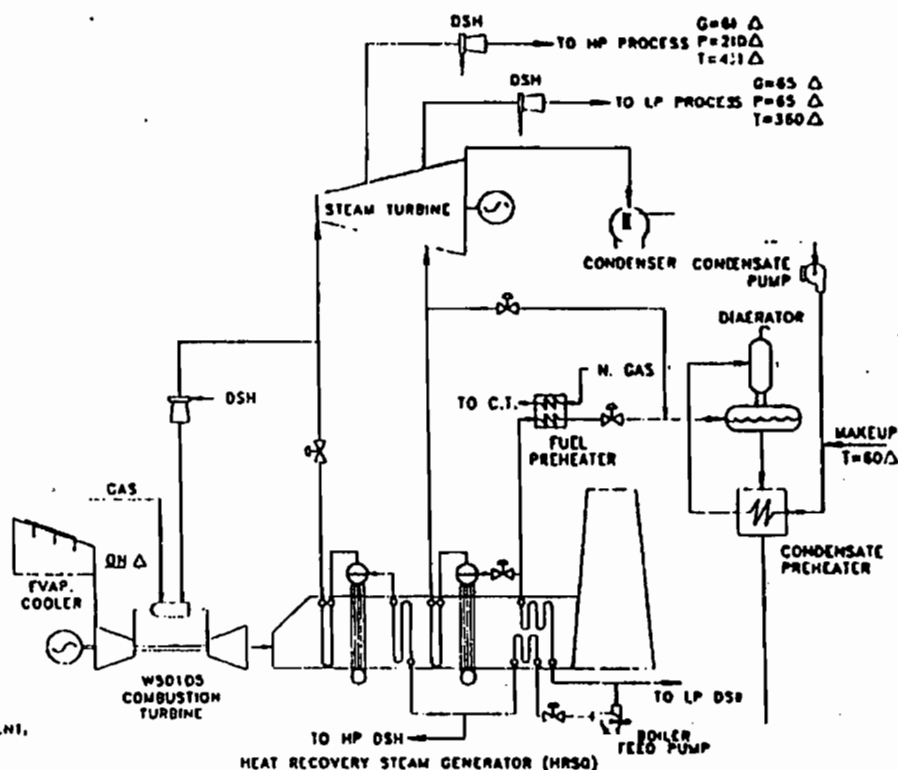
AMBIENT TEMPERATURE 59 °F Δ
 RELATIVE HUMIDITY 60 % Δ
 BAROMETRIC PRESSURE 14.7 PSIA Δ
 FUEL TYPE #2 DISTILLATE OIL Δ
 FUEL HEATING VALUE, LHV 18200 BTU/LB Δ
 GENERATOR POWER FACTOR 0.9 Δ

EST. PLANT PERFORMANCE DATA:

CT POWER 120430 KW
 ST POWER 31957 KW
 GROSS POWER 152387 KW
 AUX LOADS AND LOSSES 4623 KW
 NET POWER 147764 KW
 TOTAL FUEL INPUT, LHV 1186.3 MMBTU/HR
 NET PLANT HEAT RATE, LHV 6042 BTU/KW-HR
 STACK NOx EMISSION 42 PPMV

NOTES:

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NOx EMISSIONS ARE BASED ON 15% O₂ AND ISO CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 84% C, 13.775% H, 0.2% S, 0.015% FBN, 0.01% ASH.
6. PERFORMANCE BASED ON DISTILLATE OIL WITH A MAXIMUM SULFUR CONTENT OF 0.05% AND 0.015% FUEL BOUND NITROGEN.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



LEGEND:
 P = PRESSURE, PSIA
 T = TEMPERATURE, °F
 Q = FLOW, 1000 LB/HR
 H = ENTHALPY, BTU/LB

WESTINGHOUSE PROPRIETARY

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO WESTINGHOUSE ELECTRIC CORPORATION. IT IS SUBMITTED IN CONFIDENCE AND IS TO BE USED SOLELY FOR THE PURPOSE FOR WHICH IT IS FURNISHED AND RETURNED UPON REQUEST. THIS DRAWING AND SUCH INFORMATION IS NOT TO BE REPRODUCED, TRANSMITTED, DISCLOSED, OR USED OTHERWISE, IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WESTINGHOUSE ELECTRIC CORPORATION.

AUBURNDALE COGENERATION PROJECT

DATE: 08/21/93	REVISION: 1.0000	BY: J. P. VOGEL	FOR: WESTINGHOUSE ELECTRIC CORPORATION Power Generation Projects Division
DESIGNED BY: J. P. VOGEL	CHECKED BY: J. P. VOGEL	IN CHARGE: J. P. VOGEL	
DATE: 08/21/93	BY: J. P. VOGEL	FOR: WESTINGHOUSE ELECTRIC CORPORATION	
DATE: 08/21/93	BY: J. P. VOGEL	FOR: WESTINGHOUSE ELECTRIC CORPORATION	
DATE: 08/21/93	BY: J. P. VOGEL	FOR: WESTINGHOUSE ELECTRIC CORPORATION	

WARRANTED PLANT PERFORMANCE
 ORL, 59T, STEAM INJ.
 1X1 W50105 COMBINED CYCLE PLANT

Dwg No. W50105-2 Drawing No. PTC022501 Page 2 of 2

This drawing contains information proprietary to Westinghouse Electric Corporation. It is submitted in confidence and is to be used solely for the purpose for which it is furnished and returned upon request. This drawing and such information is not to be reproduced, transmitted, disclosed or used in whole or in part without the written authorization of Westinghouse Electric Corporation. Proprietary Class No.

DOCUMENT NO. 2176007

DISTRIBUTION CODE: 242-000-603

TITLE: AUBURNDALE TEST CORRECTIONS

TYPE	REV
EDD	001



WESTINGHOUSE ELECTRIC CORPORATION
 POWER GENERATION BUSINESS UNIT - ORLANDO, FL

Issue Date:

Page: 57 of 57

EC-94208

A10-5R

Westinghouse Documentation Information

W501D5 ECONOPAC SYSTEM PERFORMANCE

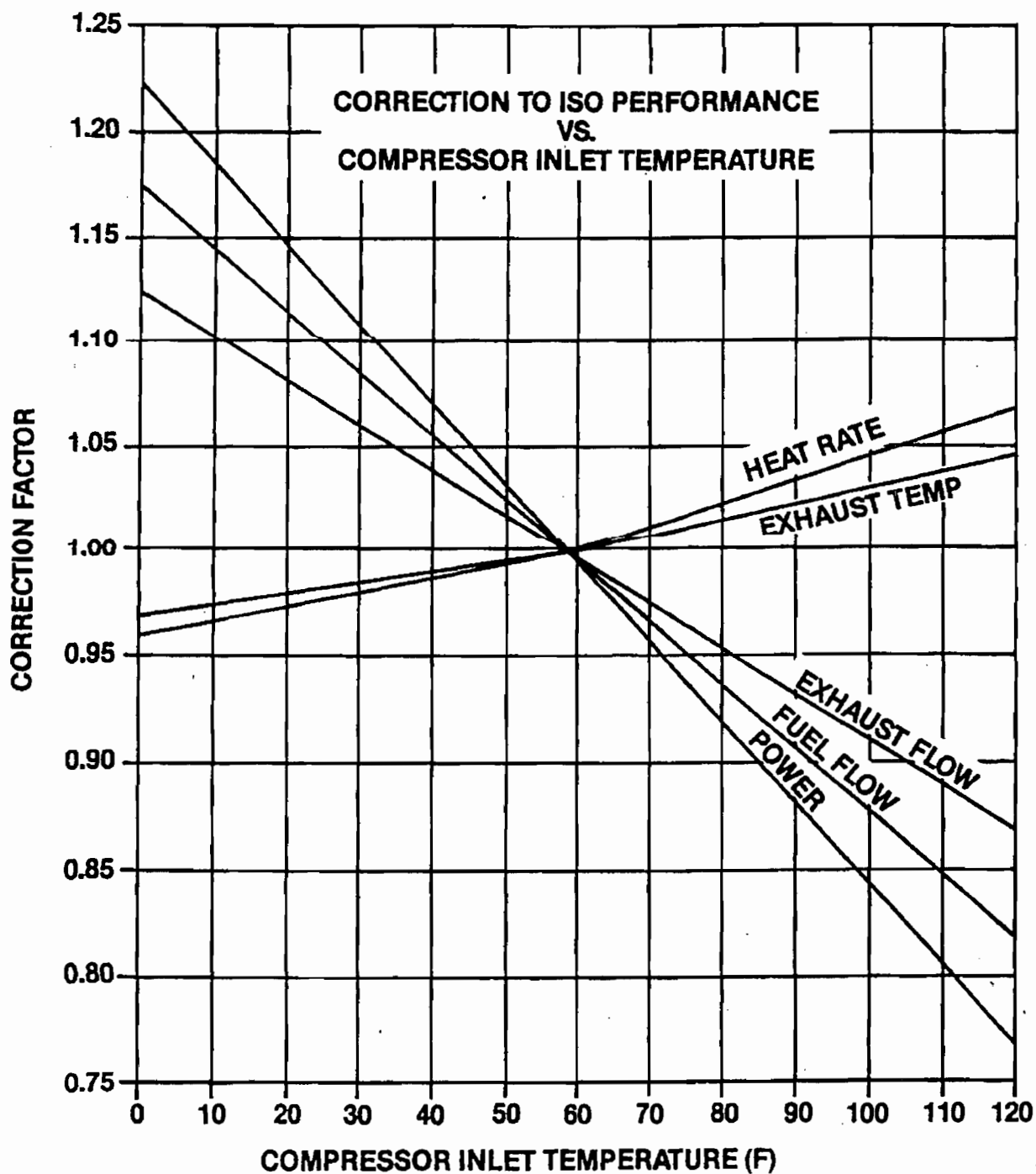


FIGURE 2

BEST AVAILABLE COPY

AUBURNDALE COGENERATION PROJECT

REVISED WARRANTED PLANT PERFORMANCE, NATURAL GAS OPERATION

OPERATING CONDITIONS:

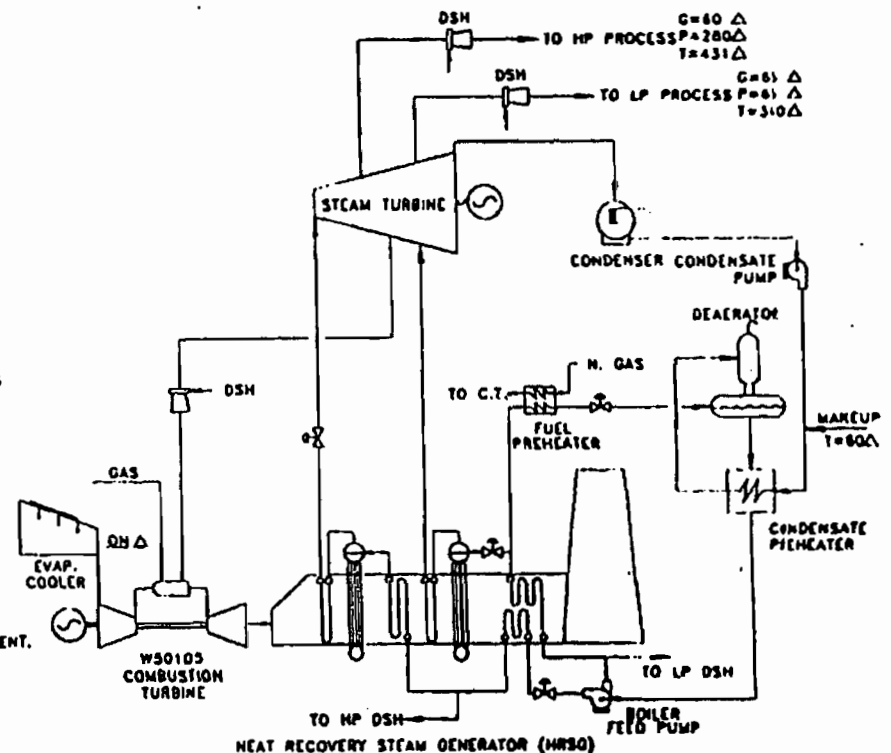
AMBIENT TEMPERATURE 59 °F Δ
RELATIVE HUMIDITY 60 % Δ
BAROMETRIC PRESSURE 14.7 PSIA Δ
FUEL TYPE NATURAL GAS Δ
FUEL HEATING VALUE, LHV 19780 BTU/LB Δ
GENERATOR POWER FACTOR 0.9 Δ

EST. PLANT PERFORMANCE DATA:

GT POWER 120520 KW
ST POWER 38708 KW
GROSS POWER 159228 KW
AUX LOADS AND LOSSES 4317 KW
NET POWER 154911 KW
TOTAL FUEL INPUT, LHV 1179.5 MMBTU/HR
NET PLANT HEAT RATE, LHV 7639 BTU/KW-HR
STACK NOX EMISSION 25 PPMVD

NOTES:

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NOX EMISSIONS ARE BASED ON 15% O₂ AND 130 CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 90% CH₄, 5% C₂H₆ AND 5% N₂.
6. PERFORMANCE BASED ON NATURAL GAS WITH A MAXIMUM SULFUR CONTENT OF 0.2 GRAMS/100 SCF.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



LEGEND:

P = PRESSURE, PSIA
T = TEMPERATURE, °F
G = FLOW, 1000 LB/HR
N = ENTHALPY, BTU/LB

WESTINGHOUSE PROPRIETARY

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO WESTINGHOUSE ELECTRIC CORPORATION. IT IS SUBMITTED IN CONFIDENCE AND IS TO BE USED SOLELY FOR THE PURPOSE FOR WHICH IT IS FURNISHED AND RETURNED UPON REQUEST. THIS DRAWING AND SUCH INFORMATION IS NOT TO BE REPRODUCED, TRANSMITTED, DISCLOSED, OR USED OTHERWISE, IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WESTINGHOUSE ELECTRIC CORPORATION.

AUBURNDALE COGENERATION PROJECT			
DATE	09/21/73	DESIGN	3.10000
BY	A. PETER	CHECKED	L. ALBA
APP'D	P	DATE	P
Cust. No. 65101-2		Drawing No. 7555000	
WARRANTED PLANT PERFORMANCE NATURAL GAS, 59°F, STEAM INJ. 1X1 WS0103 COMBINED CYCLE PLANT			
Page 1 of 1		Page 1 of 1	

This drawing contains information proprietary to Westinghouse Electric Corporation. It is submitted in confidence and is to be used solely for the purpose for which it is furnished and returned upon request. This drawing and such information is not to be reproduced, transmitted, disclosed or used in whole or in part without the written authorization of Westinghouse Electric Corporation. Proprietary Class No. _____

DOCUMENT NO. 2176007

TITLE: AUBURNDALE TEST CORRECTIONS

DISTRIBUTION CODE: 242-000-603

TYPE	REV
EDD	001



WESTINGHOUSE ELECTRIC CORPORATION
POWER GENERATION BUSINESS UNIT - ORLANDO, FL

Issue Date:

Page: 56 of 57

EC-94208

A10-57

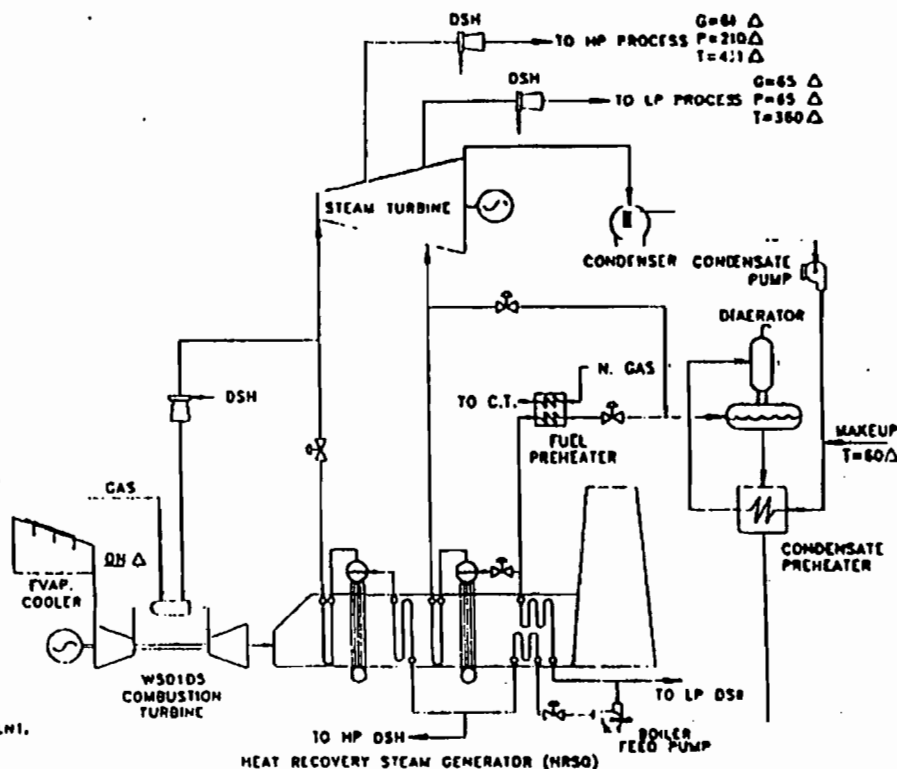
Westinghouse Proprietary Information

11/05/96 TUE 16:14 FAX 407 281 5032

(W) SITO

REVISED WARRANTED PLANT PERFORMANCE, OIL OPERATION

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NO_x EMISSIONS ARE BASED ON 15% O₂ AND ISO CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 86% C, 13.775% H, 0.2% S, 0.015% FeN, 0.01% ASH.
6. PERFORMANCE BASED ON DISTILLATE OIL WITH A MAXIMUM SULFUR CONTENT OF 0.05% AND 0.015% FUEL BOUND NITROGEN.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



DATE 06/21/81	ISSUED 0.0000	Development Electric Corporation Power Conversion Property Division WARRANTED PLANT PERFORMANCE OIL, 597, STEAM INJ. 1X1 WS0109 COMBINED CYCLE PLANT
G. FITCH CHIEF E.E. E. ALBA MFG. ENG.		
CAD NO. HD1285.2	DRAWING NO. FIC937281 SHEET NO. 2 OF 2	

TYPE	REV
EDD	00

Page: 57 of 57

W501D5 ECONOPAC SYSTEM PERFORMANCE

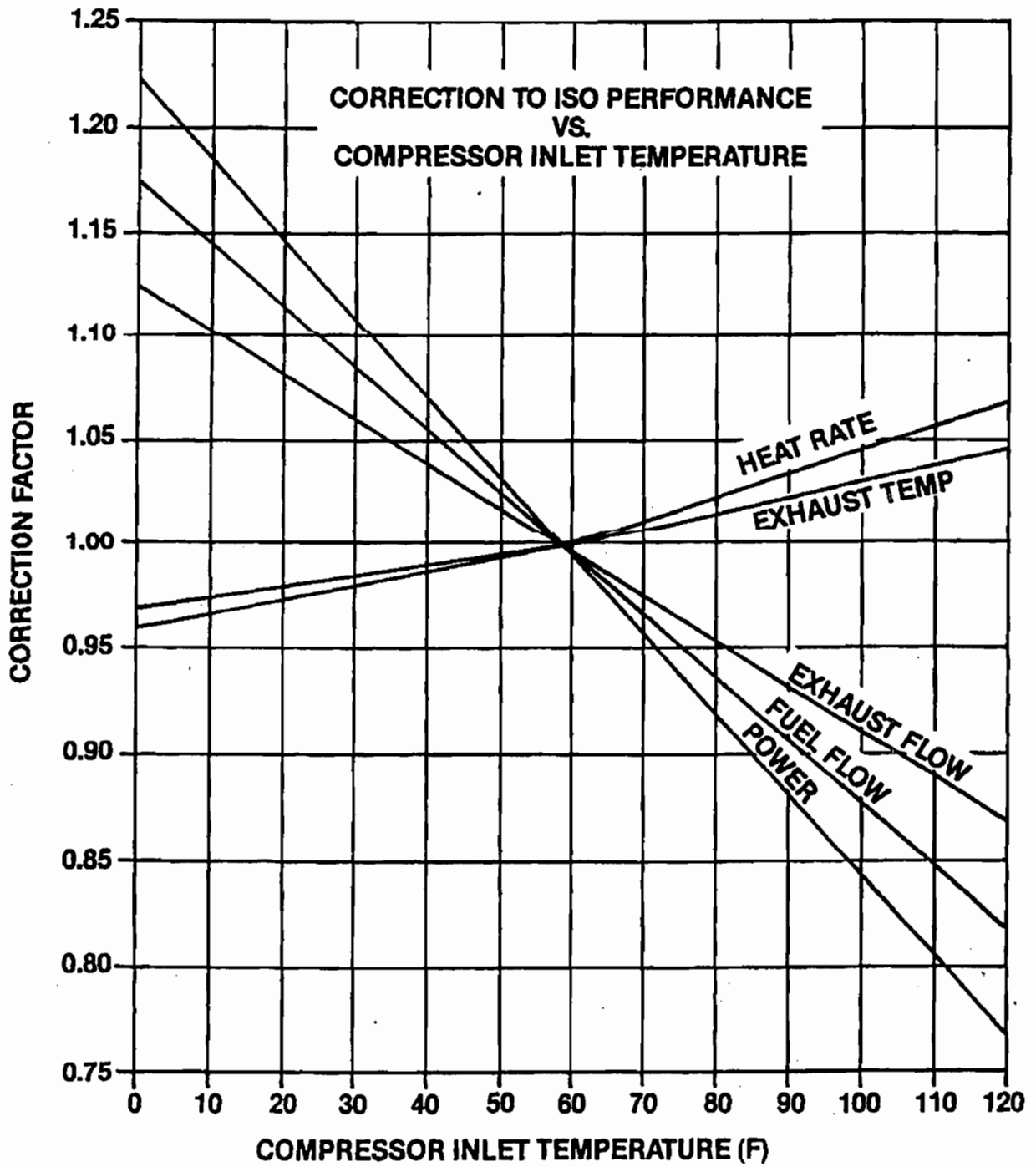


FIGURE 2

BEST AVAILABLE COPY

AUBURNDALE COGENERATION PROJECT

REVISED WARRANTED PLANT PERFORMANCE, NATURAL GAS OPERATION

OPERATING CONDITIONS:

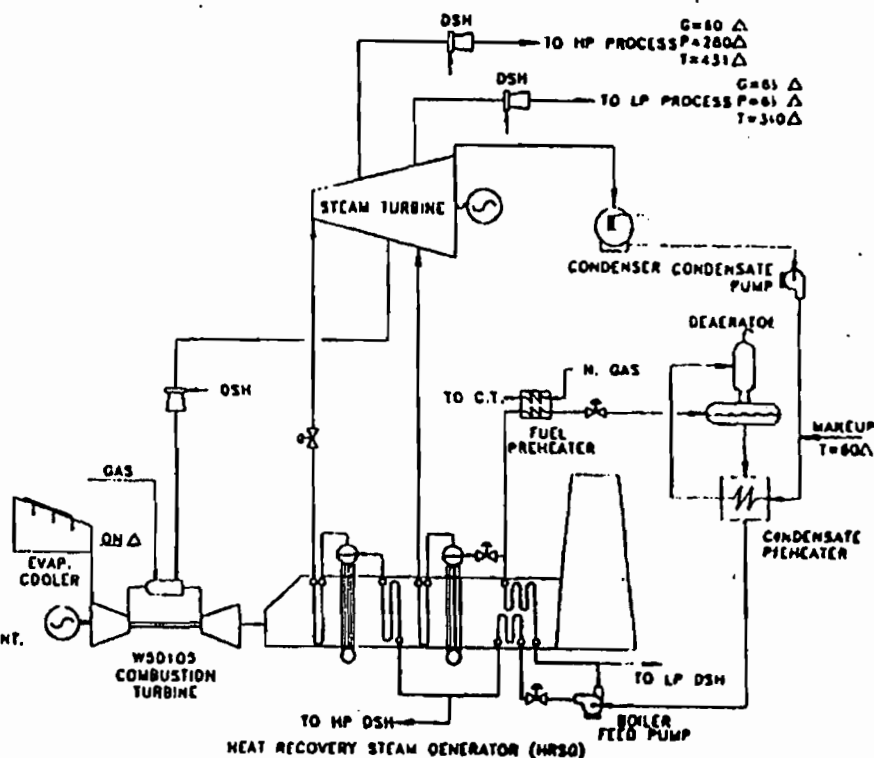
AMBIENT TEMPERATURE 59 °F Δ
 RELATIVE HUMIDITY 60 % Δ
 BAROMETRIC PRESSURE 14.7 PSIA Δ
 FUEL TYPE NATURAL GAS Δ
 FUEL HEATING VALUE, LHV 19780 BTU/LB Δ
 GENERATOR POWER FACTOR 0.9 Δ

EST. PLANT PERFORMANCE DATA:

CT POWER 120520 KW
 ST POWER 38708 KW
 GROSS POWER 159228 KW
 AUX LOADS AND LOSSES 4317 KW
 NET POWER 154911 KW
 TOTAL FUEL INPUT, LHV 1179.5 MMBTU/HR
 NET PLANT HEAT RATE, LHV 7639 BTU/KW-HR
 STACK NOX EMISSION 25 PPMVD

NOTES:

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NOX EMISSIONS ARE BASED ON 15% O₂ AND 130 CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 90% CH₄, 5% C₂H₆ AND 5% N₂.
6. PERFORMANCE BASED ON NATURAL GAS WITH A MAXIMUM SULFUR CONTENT OF 0.2 GRAINS/100 SCF.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



LEGEND:
 P = PRESSURE, PSIA
 T = TEMPERATURE, °F
 G = FLOW, 1000 LB/HR
 H = ENTHALPY, BTU/LB

WESTINGHOUSE PROPRIETARY

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO WESTINGHOUSE ELECTRIC CORPORATION. IT IS SUBMITTED IN CONFIDENCE AND IS TO BE USED SOLELY FOR THE PURPOSE FOR WHICH IT IS FURNISHED AND RETURNED UPON REQUEST. THIS DRAWING AND SUCH INFORMATION IS NOT TO BE REPRODUCED, TRANSMITTED, DISCLOSED, OR USED OTHERWISE, IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WESTINGHOUSE ELECTRIC CORPORATION.

AUBURNDALE COGENERATION PROJECT			
DATE	09/21/93	REVISION	2.0000
DRAWN BY	G. P. 17000	CHECKED BY	J. ALBA
APPROVED BY	P	DESIGNED BY	P
DATE	09/21/93	DRAWING NO.	PCS372001
Westinghouse Electric Corporation Power Generation Projects Division		WARRANTED PLANT PERFORMANCE NATURAL GAS, 59°F, STEAM 1XJ. 1X1 W50103 COMBINED CYCLE PLANT	
Page 1 of 1			

This drawing contains information proprietary to Westinghouse Electric Corporation. It is submitted in confidence and is to be used solely for the purpose for which it is furnished and returned upon request. This drawing and such information is not to be reproduced, transmitted, disclosed or used in whole or in part without the written authorization of Westinghouse Electric Corporation. Proprietary Class No. _____

DOCUMENT NO. 2176007

DISTRIBUTION CODE: 242-000-603

TITLE: AUBURNDALE TEST CORRECTIONS

TYPE	REV
EDD	001



WESTINGHOUSE ELECTRIC CORPORATION
POWER GENERATION BUSINESS UNIT - ORLANDO, FL

Issue Date:

Page: 56 of 57

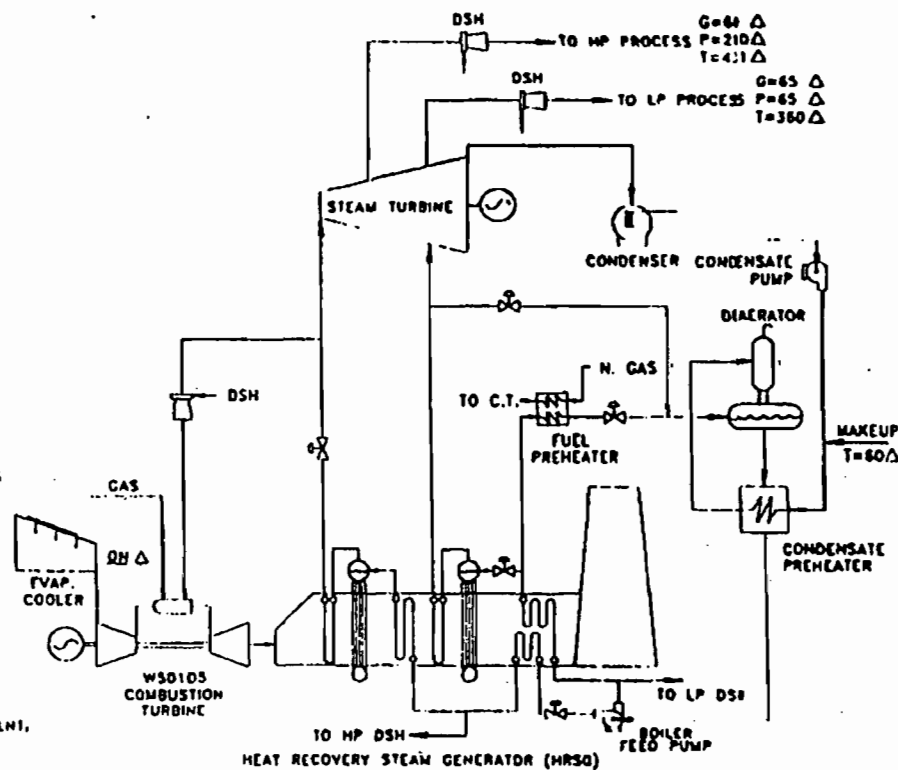
EC-94208


A10-57

Westinghouse Proprietary Information

REVISED WARRANTED PLANT PERFORMANCE, OIL OPERATION

1. * INDICATES A WARRANTED VALUE. ALL OTHER VALUES ARE ESTIMATED.
2. Δ INDICATES A PARAMETER WHICH, IF DIFFERENT, RESULTS IN A CORRECTION TO THE CALCULATED PERFORMANCE.
3. NET PLANT POWER REFERENCED TO THE HIGH SIDE OF THE TRANSFORMER. TRANSFORMER LOSSES HAVE BEEN INCLUDED.
4. NO_x EMISSIONS ARE BASED ON 15% O₂ AND ISO CONDITIONS.
5. PERFORMANCE IS BASED ON A FUEL COMPOSITION OF 86% C, 13.775% H, 0.2% S, 0.015% FBN, 0.01% ASM.
6. PERFORMANCE BASED ON DISTILLATE OIL WITH A MAXIMUM SULFUR CONTENT OF 0.05% AND 0.015% FUEL BOUND NITROGEN.
7. PERFORMANCE VALUES ARE FOR NEW AND CLEAN EQUIPMENT.
8. STEAM INJECTION RATES MAY BE ADJUSTED UP TO 20% TO MEET EMISSIONS WARRANTY.
9. REFER TO THE APPLICABLE CONTRACT FOR THE DETAILS OF THE PERFORMANCE GUARANTEES.
10. PROCESS STEAM CONDITIONS ARE AT THE SITE BOUNDARY.



ALBUQUERQUE COGENERATION PROJECT			
DATE: 08/11/93		DRAWING NO. 6.0000	
BY: G. P. YONG		 WATKINS-STEAM POWER CORPORATION POWER CONSTRUCTION PROJECTS DIVISION	
CHECKED BY: J. ALBA			
DATE: 08/11/93			
CADD NO. 001255_2		WARRANTED PLANT PERFORMANCE 01L 59T, STEAM INJ. 1X1 W50105 COMBINED CYCLE PLANT	
Drawing No. 001255_2		Drawing No. 001255_2 Page 2 of 2	

Page: 57 of 57

APPENDIX D

P.E. CERTIFICATION STATEMENT AND EXCEPTIONS

Professional Engineer Certification

1. Professional Engineer Name: **Thomas W. Davis**
Registration Number: **36777**

2. Professional Engineer Mailing Address:

Organization/Firm: **Environmental Consulting & Technology, Inc.**
Street Address: **3701 NW 98th Street**
City: **Gainesville** State: **FL** Zip Code: **32606-5004**

3. Professional Engineer Telephone Numbers:

Telephone: **(352) 332-0444** Fax: **(352) 332-6722**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

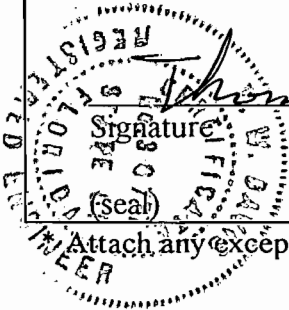
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emission units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



W. B. Allen

Date

11/5/96

Attach any exception to certification statement.

**AUBURNDALE POWER PARTNERS
EXCEPTIONS TO INITIAL CONSTRUCTION PERMIT APPLICATION**

Alterations from original design consist of a revision in equipment locations and change in height of the HRSG structure. The current equipment layout is shown on Document II.D.2 (Electronic Filename D_IID2.DXF). The CT/HRSG equipment is located more to the center of the plant property than originally premised. The heat recovery steam generator (HRSG) structure has increased in height by 3 meters.

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address: Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 NW 98th Street City: Gainesville State: FL Zip Code: 32606-5004
3. Professional Engineer Telephone Numbers: Telephone: (352) 332-0444 Fax: (352) 332-6722

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

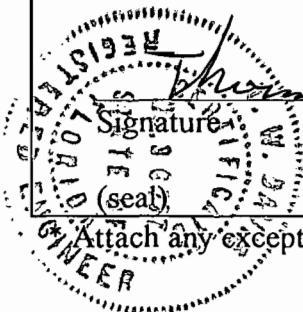
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emission units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



W. B. A.

Date

11/5/96

Attach any exception to certification statement.

**AUBURNDALE POWER PARTNERS
EXCEPTIONS TO INITIAL CONSTRUCTION PERMIT APPLICATION**

Alterations from original design consist of a revision in equipment locations and change in height of the HRSG structure. The current equipment layout is shown on Document II.D.2 (Electronic Filename D_IID2.DXF). The CT/HRSG equipment is located more to the center of the plant property than originally premised. The heat recovery steam generator (HRSG) structure has increased in height by 3 meters.

Professional Engineer Certification

1. Professional Engineer Name: **Thomas W. Davis**
Registration Number: **36777**

2. Professional Engineer Mailing Address:

Organization/Firm: **Environmental Consulting & Technology, Inc.**
Street Address: **3701 NW 98th Street**
City: **Gainesville** State: **FL** Zip Code: **32606-5004**

3. Professional Engineer Telephone Numbers:

Telephone: **(352) 332-0444** Fax: **(352) 332-6722**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

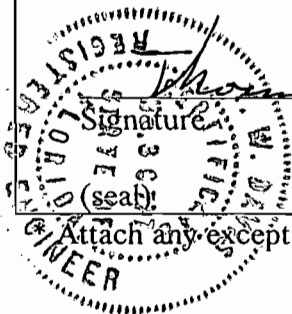
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emission units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



11/5/96
Date

**AUBURNDALE POWER PARTNERS
EXCEPTIONS TO INITIAL CONSTRUCTION PERMIT APPLICATION**

Alterations from original design consist of a revision in equipment locations and change in height of the HRSG structure. The current equipment layout is shown on Document II.D.2 (Electronic Filename D_IID2.DXF). The CT/HRSG equipment is located more to the center of the plant property than originally premised. The heat recovery steam generator (HRSG) structure has increased in height by 3 meters.

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777			
2. Professional Engineer Mailing Address: Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 NW 98th Street City: Gainesville State: FL Zip Code: 32606-5004			
3. Professional Engineer Telephone Numbers: Telephone: (352) 332-0444 Fax: (352) 332-6722			

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

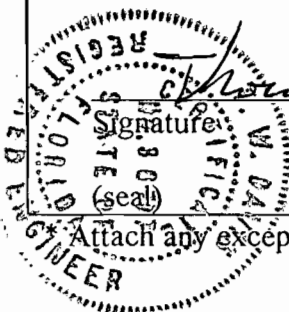
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emission units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



W. D. Davis

Date

11/5/96

*Attach any exception to certification statement.

**AUBURNDALE POWER PARTNERS
EXCEPTIONS TO INITIAL CONSTRUCTION PERMIT APPLICATION**

Alterations from original design consist of a revision in equipment locations and change in height of the HRSG structure. The current equipment layout is shown on Document II.D.2 (Electronic Filename D_IID2.DXF). The CT/HRSG equipment is located more to the center of the plant property than originally premised. The heat recovery steam generator (HRSG) structure has increased in height by 3 meters.

APPENDIX E

ACID RAIN REQUIREMENTS

AUBURNDALE POWER PARTNERS, LIMITED PARTNERSHIP

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

Telephone: (703) 222-0445 • Fax: (703) 227-0516

April 29, 1996

LTR.APP0018

US Environmental Protection Agency
Acid Rain Program (6204J)
Attention: Designated Representative
401 M Street, S.W.
Washington, D.C. 20460

Subject: Auburndale Cogeneration Facility
ORIS #: 054658
Certificate of Representation

Dear Mr. Sir or Madam:

Auburndale Power Partners (APP), Limited Partnership, a wholly-owned subsidiary of Mission Energy Company, operates a nominal 156 megawatt (MW) cogeneration facility located near Auburndale, Polk County, Florida.

The APP facility qualifies as a 40 CFR Part 75 regulated facility under the Acid Rain Program. Please be advised that the authorized representative for the APP cogeneration facility has been changed from Mr. Donald Fields to Mr. Bruce Franco, P.E. Four copies of a revised Certificate of Representation statements are enclosed.

Please contact me at (703) 222-0445 if there are any questions regarding this submission.

Very truly yours,



Bruce L. Franco, P.E.
Executive Director

cc: Tom Davis; ECT
Axel Santiago; APP



Certificate of Representation

Page 1

For more information, see instructions and refer to 40 CFR 72.24

This submission is: ☐ New ☒ Revised

STEP 1
Identify the source by
plant name, State, and
ORIS code from NADB

Plant Name	Auburndale Cogeneration Facility	State	FL	54658
				ORIS Code

STEP 2
Enter requested
information for the
designated
representative

Name		Bruce L. Franco, P.E.	
Address			
12500 Fair Lakes Circle Suite 200 Fairfax, VA 22033			
Phone Number		(703) 222-0445	
Fax Number		(703) 227-2760	

STEP 3
Enter requested
information for the
alternate designated
representative
(optional)

Name	
Address	
Phone Number	Fax Number

STEP 4
Complete Step 5, read
the certifications and
sign and date

I certify that I was selected as the designated representative or alternate designated representative, as applicable, by an agreement binding on the owners and operators of the affected source and each affected unit at the source.

I certify that I have given notice of the agreement, selecting me as the designated representative or alternate designated representative, as applicable for the affected source and each affected unit at the source identified in this certificate of representation, daily for a period of one week in a newspaper of general circulation in the area where the source is located or in a State publication designed to give general public notice.

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and of each affected unit at the source and that each such owner and operator shall be fully bound by my actions, inactions, or submissions.

I certify that I shall abide by any fiduciary responsibilities imposed by the agreement by which I was selected as designated representative or alternate designated representative, as applicable.

I certify that the owners and operators of the affected source and of each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under life-of-the-unit, firm power contractual arrangements, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the affected source and of each affected unit at the source; and

Allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement or, if such multiple holders have expressly provided for a different distribution of allowances by contract, that allowances and the proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

The agreement by which I was selected as the alternate designated representative includes a procedure for the owners and operators of the source and affected units at the source to authorize the alternate designated representative to act in lieu of the designated representative.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected 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.

Signature (designated representative) <i>Bruce L. Harris</i>	Date <i>4/25/96</i>
Signature (alternate)	Date

STEP 5

Provide the name of every owner and operator of the source and each affected unit at the source. Identify the units they own and/or operate by boiler ID# from NADB. For owners only, identify each state or local utility regulatory authority with jurisdiction over each owner

Name <i>Auburndale Power Partners, L.P.</i>						<input checked="" type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID# <i>1</i>	ID#	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities							

Name <i>Mission Operation & Maintenance, Inc.</i>						<input type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
ID# <i>1</i>	ID#	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities							

Name						<input type="checkbox"/> Owner	<input type="checkbox"/> Operator
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
ID#	ID#	ID#	ID#	ID#	ID#	ID#	
Regulatory Authorities							

APPENDIX F

GENERAL APPLICATION UPDATES

DIVISION OF AIR RESOURCES MANAGEMENT APPLICATION FOR AIR PERMIT - LONG FORM

Identification of Facility Addressed in This Application

1. Facility Owner/Company Name : Auburndale Power Partners, Ltd.		
2. Site Name : Auburndale Cogeneration Facility		
3. Facility Identification Number :	1050221	[] Unknown
4. Facility Location : Auburndale Cogeneration Facility Derby Avenue, Auburndale, Polk County		
Street Address or Other Locator :	1501 Derby Avenue	
City : Auburndale	County : Polk	Zip Code : 33823-4079
5. Relocatable Facility? [] Yes [X] No		6. Existing Permitted Facility? [X] Yes [] No

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type
001	Combustion Turbine #1	N/A
No Id	Distillate Fuel Oil Storage Tanks STR-001 and STR-002	N/A

Application Contact

1. Name and Title of Application Contact :

Name : Axel Santiago
Title : Associate Engineer

2. Application Contact Mailing Address :

Organization/Firm : Auburndale Power Partners, Ltd.
Street Address : 1501 Derby Avenue
City : Auburndale
State : FL Zip Code : 33823-4079

3. Application Contact Telephone Numbers :

Telephone : (941)965-1561 Fax : (941)965-1924

Application Comment

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility, Location, and Type

1. Facility UTM Coordinates : Zone : 17 East (km) : 420.80 North (km) : 3103.30			
2. Facility Latitude/Longitude : Latitude (DD/MM/SS) : Longitude (DD/MM/SS) :			
3. Governmental Facility Code : 0	4. Facility Status Code : A	5. Facility Major Group SIC Code : 49	6. Facility SIC(s) : 4911
7. Facility Comment :			

Facility Contact

1. Name and Title of Facility Contact : Axel Santiago Associate Engineer	
2. Facility Contact Mailing Address : Organization/Firm : Auburndale Power Partners, Ltd. Street Address : 1501 Derby Avenue City : Auburndale State : FL Zip Code : 33823-4079	
3. Facility Contact Telephone Numbers : Telephone : (941)965-1561 Fax : (941)965-1924	

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
NOX	A
CO	A
SO2	A
PM10	SM
VOC	B
H015	B
H021	B
FL	B
H114	B
SAM	B
PB	B
PM	SM

APPENDIX G

REVISED ELECTRONIC SUBMITTAL



Lawton Chiles
Governor

Department of Environmental Protection

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

August 12, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bruce L. Franco
Executive Director
Auburndale Power Partners, Ltd.
1501 Derby Avenue
Auburndale, FL 33823

Re: Detailed Completeness Review of Initial Title V Permit Application
File No. 1050221-002-AV
Auburndale Cogeneration Facility, Polk County

Dear Mr. Franco:

On October 26, 1995, the Department received your application dated October 25, 1995, for the Auburndale Cogeneration Facility located at 1501 Derby Avenue, Auburndale, Polk County.

Since the time of your application, the Department made changes to the rules and the long application form, DEP Form No. 62-210.900(1). Many of the changes the Department made were in response to EPA's request in order for the State of Florida to receive 'full' Title V program approval. At the time you applied, the State of Florida was under 'interim' Title V program approval. Some of the changes that appear to have affected your application relate to the criteria for exempting emissions units and/or activities, classifying emissions units and/or activities, pollutant reporting at both the facility and emissions unit levels, and the Professional Engineer (P.E.) certification statement. Some sections of the long application form were simplified such that you may have overreported.

The major changes went into effect March 20 and 21, 1996. The new long application form, DEP Form No. 62-210.900, was effective March 21, 1996. The Chapter 62-210, F.A.C., changes went into effect March 21, 1996, and Chapter 62-213, F.A.C., changes went into effect March 20, 1996.

Scott

F4I.

Ed Sweeney 8/12
Tom Casco TMC 8-19-96
~~John A. Hottel~~ 8/19/96
~~Charles Logan~~

Virginia B. Wetherell
Secretary

6 City Phillips

Mr. Bruce L. Franco
August 12, 1996
Page 2 of 4

In order to continue processing your Title V air operation permit application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. 'Exempt,' 'Unregulated,' and 'Trivial' Emissions Units and/or Activities

You referenced items from the "List of Insignificant Source Summary for Electric Power Plants" in the attachment labeled "Auburndale Cogeneration Facility Insignificant and Exempt Source Units, document identified as DIID7.wpf." The "List of Insignificant Source Summary for Electric Power Plants," dated May 20, 1994, that was developed by the Department and industry, is outdated. However, the list will continue to be useful because new emissions units and/or activities have been identified.

You also referenced several of the full exemptions from air permitting contained in Rule 62-210.300(3)(a), F.A.C. The Department changed several of these full exemptions from air permitting. Restrictions were added to keep the listed exemptions below a level that could inadvertently trigger Title V applicability.

Currently, in order for an emissions unit and/or activity to be 'exempt' in the Title V permit, the emissions unit and/or activity can not exceed one or more of the emissions thresholds or have a unit-specific requirement (see Rule 62-213.430(6), F.A.C.).

Also, the Department has issued guidance on emissions units and/or activities that are considered 'trivial' (see enclosed DARM-PER/V-15, revised March 15, 1996). These emissions units and/or activities no longer need to be included in Title V permit applications. Many of the emissions units and/or activities included in your attachment fall into this category. 'Trivial' emissions units and/or activities will not be included in the Title V permit.

a. Please update your attachment and provide sufficient information to classify the emissions units and/or activities into the two new categories - those that are 'exempt' and those that are 'unregulated.'

Mr. Bruce L. Franco
August 12, 1996
Page 3 of 4

To properly update the attachment you need to consider the requirements of Rule 62-213.430(6), F.A.C. If the answer to any of these questions is yes, an emissions unit and/or activity cannot be 'exempt.'

- (1) Do any of the units or activities have a unit-specific applicable requirement?
- (2) Does each unit emit or have the potential to emit equal to or greater than:
 - 1,000 pounds/year of any hazardous air pollutant (HAP);
 - 2,500 pounds/year of total HAPs; and/or
 - 5 TPY of any other regulated air pollutant, i.e., volatile organic compound (VOC)?

For example, more information is needed on "Parts cleaning and degreasing stations" and "Storage tanks < 550 gallons" in order to properly classify each as either 'unregulated' or 'exempt.'

2. Emissions Estimates

The Department has a responsibility to ensure, on a unit-by-unit basis, that emissions factors are reasonably representative of an emissions unit's potential emissions. Thus, you need to include with each application any source documents that provide the basis of such estimates, unless you are using AP-42 or a document that is reasonably available to the Department.

a. In your application you reference "FCG, 1995" and "Westinghouse, 1992" emission factors. If you intend to use these emissions factors, please provide a copy of these emissions factors, along with the supporting documentation on how they were determined.

3. Please submit the "CT-specific graph of the relationship between ambient temperature and heat inputs to the CT" that was required by Permit Number AC53-208321, Specific Condition Number 25.

4. P.E. Certification Statement

a. Since this is the initial air operation permit application, please indicate whether or not the emissions units permitted under the air construction (AC) permit were constructed in accordance with the construction permit application and AC permit. We found a comment on several exceptions noted in the ELSA (ELectronic Submission of Application). To accomplish this, please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed), and list any exceptions.

Mr. Bruce L. Franco
August 12, 1996
Page 4 of 4

5. Acid Rain Requirements

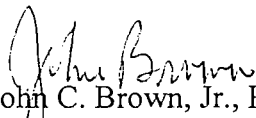
Department records indicate Mr. Donald W. Fields was the Responsible Official and the Designated Representative for Acid Rain purposes. Recently, the Department received a letter dated April 26, 1996, indicating that the authorized representative for the facility is now Mr. Bruce L. Franco, Executive Director.

a. Is Mr. Donald W. Fields still the Designated Representative? If not, you need to update this change with EPA and provide a copy to us.

The Department should receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please contact Scott Sheplak or me at (904) 488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/ss/k

Enclosures

copy to:

Thomas W. Davis, P.E., Environmental Consulting & Technology, Inc.
Bill Thomas, Southwest District Office

(electronic file name: 10502211.14r)

Memorandum

Florida Department of Environmental Protection

DARM-PER/V-15
REVISED

TO: District Air Program Administrators
County Air Program Administrators
Bureau of Air Regulation Engineers

FROM: Howard L. Rhodes, Director *HLR*
Division of Air Resources Management

DATE: March 15, 1996

SUBJECT: Revision to Trivial List of Activities at a
Title V Facility

This guidance replaces the February 12, 1996 Guidance, DARM-PER/V-15. The only change is the rule siting in text of document.

Attachment A of a July 3, 1995 Environmental Protection Agency (EPA) memorandum, "Initial Operating Permit Application Compliance Certification Policy," commonly called the White Paper, attached, comprises a listing of trivial activities.

With one exception, Title V permits will not require that these activities be listed in the Title V permit applications or the Title V permits. These activities are treated as if they emit no air pollutants.

The EPA listing conditionally includes painting under the category of plant maintenance and upkeep activities (page 1) as a trivial activity. If painting activities at a Title V source in Florida result in emissions that are below the thresholds for exemption in Rule 62-213.430(6)(b), F.A.C., they may be included in the application as exemptible activities. Otherwise, they should be listed, but not quantified, as unregulated activities, provided the painting activities are not subject to an applicable requirement. If the painting activities result in emissions that trigger applicable requirements, they must be reported and quantified.

HLR/jb/k

Attachment

knows or has reason to believe would be emitted in an amount equal to or greater than:

a. 5.0 tons per year for carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds; or

b. 500 pounds per year for lead and lead compounds expressed as lead.

4. Each Title V source that emits or has the potential to emit any hazardous air pollutant or total hazardous air pollutants in a major amount as set forth in Rule 62-213.(3)(c)1., F.A.C., shall identify, for each emissions unit, each such pollutant which the applicant knows or has reason to believe would be emitted in an amount equal to or greater than:

a. 1,000 pounds per year for each hazardous air pollutant.

b. 2,500 pounds per year for total hazardous air pollutants.

5. Title V sources which are also subject to the Federal Acid Rain Program shall report all emissions of sulfur dioxide and nitrogen oxides from any acid rain unit in accordance with this subsection or the reporting requirements of the Federal Acid Rain Program, whichever are more stringent.

(d) Process and operating information;

(e) Control equipment information;

(f) Calculations;

(g) Identification of all applicable requirements and test methods;

(h) Limitations on source operation affecting emissions;

(i) Proposed alternate methods of operation;

(j) Compliance statement;

(k) Compliance schedule and methodology, if applicable;

(l) Reporting and recordkeeping requirements;

(m) A list of emissions units or activities for which exemption is requested because of size or production rate and any information needed to demonstrate

that the units or activities qualify for exemption under the provisions of Rule 62-213.430(6), F.A.C.

(4) Certification by Responsible Official. 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 this chapter 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.

Specific Authority: 403.061, 403.087, F.S.

Law Implemented: 403.061, 403.0872, F.S.

History: New 11-28-93; Amended 4-17-94; Formerly 17-213.420; Amended 11-23-94, 4-2-95, 10-11-95, 3-13-96, 3-20-96.

62-213.430 Permit Issuance, Renewal, and Revision.

(1) Action on Application. Except for those applications submitted pursuant to Rule 62-213.420(1)(a)1., F.A.C., the Department shall issue a draft permit or a determination that the requested permit be denied within 90 days after receipt of the latest of: the application; the last item of information requested pursuant to Rule 62-213.420(1)(b), F.A.C.; or, a written request to process the application without the requested information. The Department shall issue a permit, permit revision or renewal only after all of the following conditions have been met:

(a) The applicant has submitted a complete application, properly certified by a responsible official as required by Rule 62-213.420(4), F.A.C., and either all corrected and supplemental information requested or a written request to process the application without such information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.;

(b) The Department and the applicant have complied with the requirements for notice and public participation described in Rules 62-103.150 and 62-210.350, F.A.C.;

(c) The Department has complied with the requirements for notifying and responding to affected states and approved local air programs pursuant to Rule 62-213.450(2) and (3), F.A.C.;

(d) The Department has provided EPA with a copy of the draft permit, proposed permit and any notices required under Rule 62-213.450(1) and (2), F.A.C., and has not received written EPA objection to issuance of the permit within the time period specified in Rule 62-213.450(4). If the Department receives timely EPA objection, the Department shall not take final action until the Department receives written notice that the objection is resolved or withdrawn;

(e) The Department has provided a statement to EPA setting forth the basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

(2) Permit Denial. If the Department proposes to deny the permit application, the Department shall provide the applicant an explanation of the denial in accordance with Rule 62-4.070(6), F.A.C.

(3) Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

(4) Permit Revision Procedures. Permit revisions shall meet all requirements of this chapter, including those for content of applications, public participation, review by approved local air programs and affected States, and review by EPA, as they apply to permit

issuance and permit renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference.

(5) EPA Recommended Actions. Within 90 days after receipt of notification from EPA that cause exists to modify, suspend, or revoke a permit, the Department shall investigate and determine whether cause exists pursuant to 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference, and shall forward the determination to EPA. If cause exists, the Department shall proceed according to the requirements of Rule 62-4.080 or 62-4.100, F.A.C., and 40 CFR 70.7(f) to modify, suspend, or revoke the permit.

(6) Exemption of Emissions Units or Pollutant-Emitting Activities.

(a) All requests for exemption of emissions units or activities made pursuant to Rule 62-213.420(3)(m), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to this chapter. Exemptions shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify for exemption from permitting pursuant to this rule.

(b) No exemption shall be granted to any emissions unit or activity if:

1. Such unit or activity would be subject to any unit-specific applicable requirement;

2. Such unit or activity, in combination with other units and activities proposed for exemption, would cause the facility to exceed any major source threshold(s) as defined in Rule 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); or

3. Such unit or activity would emit or have the potential to emit:

a. 500 pounds per year or more of lead and lead compounds expressed as lead;

b. 1,000 pounds per year or more of any hazardous air pollutant;

c. 2,500 pounds per year or more of total hazardous air pollutants; or

d. 5.0 tons per year or more of any other regulated pollutant.

Specific Authority: 403.061, 403.087, F.S.

Law Implemented: 403.031, 403.061, 403.087, 403.0872, F.S.

History: New 11-28-93, Formerly 17-213.430; Amended 11-23-94, 3-13-96, 3-20-96.

62-213.440 Permit Content.

(1) Standard Permit Requirements. Each permit issued under this chapter shall incorporate all applicable requirements for the Title V source and for each method of operation proposed by the applicant and approved by the Department. Each such permit shall include all emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements, with citation to the Department's rule authority for each term or condition, and identification of any difference in form from the applicable requirement upon which the term or condition is based. Emissions units or pollutant-emitting activities within a Title V source exempted by Rule 62-210.300(3), F.A.C., or by specific exemption

granted by the Department consistent with Rule 62-4.040(1)(b), F.A.C., shall be identified.

(a) Permit Duration. Permits for sources subject to the Federal Acid Rain Program shall be issued for terms of five years. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five years.

(b) Monitoring and Related Recordkeeping and Reporting Requirements.

1. Each permit shall specify the following requirements with respect to monitoring:

a. Emissions monitoring and analysis procedures or test methods specified by applicable requirements;

b. Where the applicable requirement does not specify a method for periodic testing or instrumental or noninstrumental monitoring, periodic monitoring sufficient to yield reliable data and demonstrate compliance with the permit. Such monitoring requirements shall assure use of recordkeeping terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement; and

c. Requirements concerning the use, maintenance, and installation of monitoring equipment or methods.

2. The permit shall incorporate all applicable recordkeeping requirements including:

a. Records of monitoring information that specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses;

b. Retention of records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original

ATTACHMENT A

LIST OF ACTIVITIES THAT MAY BE TREATED AS "TRIVIAL"

The following types of activities and emissions units may be presumptively omitted from part 70 permit applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities.

Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.

Air-conditioning units used for human comfort that do not have applicable requirements under title VI of the Act.

Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

Non-commercial food preparation.

Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.

Janitorial services and consumer use of janitorial products.

Internal combustion engines used for landscaping purposes.

Laundry activities, except for dry-cleaning and steam boilers.

Bathroom/toilet vent emissions.

Emergency (backup) electrical generators at residential locations.

Tobacco smoking rooms and areas.

Blacksmith forges.

Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification.⁴

⁴Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if

Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.

Portable electrical generators that can be moved by hand from one location to another⁵.

Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.

Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.⁶

Air compressors and pneumatically operated equipment, including hand tools.

Batteries and battery charging stations, except at battery manufacturing plants.

Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.⁷

Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Drop hammers or hydraulic presses for forging or metalworking.

Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

Vents from continuous emissions monitors and other analyzers.

otherwise required.

⁵ "Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.

⁶ Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds. Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

⁷ Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.

Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.

CO₂ lasers, used only on metals and other materials which do not emit HAP in the process.

Consumer use of paper trimmers/binders.

Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.

Laser trimmers using dust collection to prevent fugitive emissions.

Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.¹

Routine calibration and maintenance of laboratory equipment or other analytical instruments.

Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

Hydraulic and hydrostatic testing equipment.

Environmental chambers not using hazardous air pollutant (HAP) gasses.

Shock chambers.

Humidity chambers.

Solar simulators.

Fugitive emission related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

¹ Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.

Process water filtration systems and demineralizes.

Demineralized water tanks and demineralizer vents.

Boiler water treatment operations, not including cooling towers.

Oxygen scavenging (de-aeration) of water.

Ozone generators.

Fire suppression systems.

Emergency road flares.

Steam vents and safety relief valves.

Steam leaks.

Steam cleaning operations.

Steam sterilizers.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

Date

(seal)

* Attach any exception to certification statement.

cc SWD
El Original

**AUBURNDALE POWER PARTNERS,
LIMITED PARTNERSHIP**

April 26, 1996

Mr. Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
MAY 02 1996
BUREAU OF
AIR REGULATION

**Re: Auburndale Cogeneration Facility
Title V Permit Application**

Dear Mr. Fancy:

Auburndale Power Partners (APP), Limited Partnership, a wholly-owned subsidiary of Mission Energy Company, operates a nominal 156 megawatt (MW) cogeneration facility located near Auburndale, Polk County, Florida.

The APP facility qualifies as a Title V source pursuant to Chapter 62-213.200(19), Florida Administrative Code (F.A.C.), because potential emissions of a regulated air pollutant exceed 100 tons per year. APP submitted a Title V permit application in October 1995. The application was accepted as complete by the FDEP. Please be advised that the authorized representative for the APP cogeneration facility has been changed from Mr. Don Fields to Mr. Bruce Franco, P.E. Four copies of a revised authorized representative statement are enclosed.

Please contact me at (941) 965-1561 if there are any questions regarding this application revision.

Sincerely,



Bruce L. Franco, P.E.
Executive Director
Auburndale Power Partners

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Bruce Franco, P.E.

Title : Executive Director

2. Owner or Authorized Representative or Responsible Official Mailing Address :

Organization/Firm : Auburndale Power Partners, Ltd.

Street Address : 1501 Derby Avenue

City : Auburndale

State : FL

Zip Code : 33823-____

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (941)965-1561

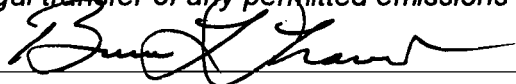
Fax : (941)965-1924

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the facility (non-Title V source) addressed in this Application for Air Permit or the responsible official, as defined in Chapter 62-213, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. If the purpose of this application is to obtain an air operation permit or operation permit revision for one or more emissions units which have undergone construction or modification, I certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Signature

Date



4/25/96

* Attach letter of authorization if not currently on file.



Environmental Consulting & Technology, Inc.

February 27, 1996

ECT No. 94677-0430-1100

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

**Re: Auburndale Cogeneration Facility
Title V Permit Application**

Dear Mr. Sheplak:

Pursuant to our recent telephone conversation regarding the above referenced project, a hardcopy of electronic files D_IID8.WP6 (List of Equipment/Activities Regulated Under Title VI) and D_III6.WP6 (Procedures for Startup and Shutdown) are enclosed as requested.

Please call me at (352) 332-6230, Ext. 351 if you have any further questions or comments regarding the Auburndale Cogeneration Facility Title V permit application.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Senior Engineer

Enclosures

Copy SWD

3701 Northwest
98th Street
Gainesville, FL
32606

(352)
332-0444

FAX (352)
332-6722

File signed

RECEIVED

FEB 28 1996

**BUREAU OF
AIR REGULATION**

**LIST OF EQUIPMENT/ACTIVITIES
REGULATED UNDER TITLE VI**

The Auburndale Cogeneration Facility includes three air conditioning units that contain greater than fifty pounds of Title VI regulated refrigerant charge. These units are located as follows:

- Unit #1 - Main Generation Building
- Unit #2 - Main Generation Building
- Unit #3 - Zero Discharge Facility

PROCEDURES FOR COMBUSTION TURBINE STARTUP AND SHUTDOWN

A. STARTUP

- Operator resets all trips and checks permissives from the WDPF (Westinghouse Distributed Processing Family) control;
- Operator initiates a start on the combustion turbine starting motor using the WDPF control; and
- Operator then verifies the following sequence of automatic events:
 - Turbine electric starting motor engages which turns the combustion turbine (CT) to a speed of approximately 900 revolutions per minute (RPM)
 - Under proper conditions, the combustors are ignited
 - Starting motor continues to accelerate the CT
 - Starting motor disengages at approximately 2,600 RPM
 - Fuel natural gas system delivers proper supply of fuel to the combustion chamber to raise the synchronous speed to approximately 3,600 RPM
 - A field is obtained and the generator breaker closes in synchronization with the grid
 - After sufficient steam pressure is obtained within the heat recovery steam generator (HRSG) high pressure drum, steam is injected to the CT to control emissions of nitrogen oxides (NO_x)

B. SHUTDOWN

- Operator executes CT normal stop from the CT start overview screen in the WDPF control;
- CT then starts to decrease load (ramp down) at approximately three megawatts (MW) per minute;
- When minimum load of approximately six MW is achieved, the generator breaker is opened and a 180 second cool down timer is started;
- Once cool down is complete, fuel valves close, bleed valves open, inlet guide vanes close, and the field breaker opens;
- Turning gear is energized at a CT speed of approximately 225 RPM; and
- At zero RPM, the CT remains in turning gear.

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

TO: fl.

FROM: SCOTT SHEPLAK

DATE: 02/21/16 TIME: ~ 11:30 a.m.

WITH: Mr. Tom Davis, ECT

REPRESENTING: Auburndale Power Partners, Ltd.

TELEPHONE NO.: (904) 332-6722

SUBJECT: Auburndale Power Partners, Ltd.

Facility ID No.: 1050221

Title V permit application received 10/24/95

SUMMARY:

We discussed the Title V permit application submitted
and pending Title V permitting rule/form changes.

The pending Title V permitting rule/form changes may
or may not have an effect on the submitted
application. The proposed changes may be less
stringent than those followed under the existing rule/form.
Mr. Davis will consider supplementing or resubmitting
after he evaluates the effects.

I informed we are using as a prototype to
develop Title V permitting formats for training purposes.

I advised my opinion would be to start processing TV
apps after pending changes finalized which may occur March '96. I
also informed Auburndale was 1st ^{TV app.} received in Florida.

DEP ROUTING AND TRANSMITTAL SLIP	
TO: (NAME, OFFICE, LOCATION)	3. _____
1. <u>John Brown</u>	4. _____
2. <u>Bruce Mitchell</u> ^{for} <u>1-4-96</u>	5. _____
<p>PLEASE PREPARE REPLY FOR:</p> <p><input type="checkbox"/> SECRETARY'S SIGNATURE</p> <p><input type="checkbox"/> DIV/DIST DIR SIGNATURE</p> <p><input type="checkbox"/> MY SIGNATURE</p> <p><input type="checkbox"/> YOUR SIGNATURE</p> <p><input type="checkbox"/> DUE DATE _____</p> <p>ACTION/DISPOSITION</p> <p><input type="checkbox"/> DISCUSS WITH ME</p> <p><input checked="" type="checkbox"/> COMMENTS/ADVISE</p> <p><input type="checkbox"/> REVIEW AND RETURN</p> <p><input type="checkbox"/> SET UP MEETING</p> <p><input type="checkbox"/> FOR YOUR INFORMATION</p> <p><input type="checkbox"/> HANDLE APPROPRIATELY</p> <p><input checked="" type="checkbox"/> INITIAL AND FORWARD</p> <p><input type="checkbox"/> SHARE WITH STAFF</p> <p><input type="checkbox"/> FOR YOUR FILES</p>	<p>COMMENTS:</p> <p>I forgot to attach the TIV/TV checklists we developed to Dec 1995 monthly report. Enclosed is a format and example.</p> <p>I recommend we log Auburndale into ARMS, then forward Auburndale to SWD office. The ARMS is still in Beta; therefore, it can't be logged in as yet.</p> <p style="text-align: right;"><i>for</i></p>
<p>FROM: <u>Scott Sheplek</u> DATE: <u>1/4/96</u> PHONE: _____</p>	

Summary checklist for initial Title V permit applications

Facility Name Auburndale Power Partners, Ltd. Project: Auburndale Cogeneration
 Facility ID No.: 1050221 receipt date 10/26/95

I. Preliminary scan of application submitted.

- a. Was application submitted to correct permitting authority? Y ✓ N
- b. Was an application filed? Y* ✓ N
- c. Was the application filed timely? Y* ✓ N
- d. Application format filed [check one].
 Hard copy of official version of form?
 A facsimile of official version of form?
 ELSA? ✓
 Some combination?
- e. 4 copies (paper/electronic) submitted? Y ✓ N
- f. Electronic information submitted previewed? Y ✓ N N/A
 Electronic diskettes protected/virus scanned/marked? Y ✓ N N/A
- g. Entire hard copy of Section I. provided (Pages 1-8 of form)? Y N ✓
 Facility identified (Page 1)? [if not complete a Page 1] Y* [Attached ✓]
 R.O. certification signed and dated (Page 2)? Y* ✓ N
 P.E. certification signed and dated (Page 7)? Y* ✓ N
- h. Any confidential information? Y N ✓
 If so, hard copy provided to us and EPA? Y* N
- i. Type of application filed.
 Application for Title V permit only? Y ✓ N
 Any units subject to acid rain? {see checklist} Y ✓ N

Reviewer's initials JS date 12/14/95

Note(s): [*] = mandatory.

Comment(s): d. ELSA included Wordperfect files; files converted to Word and posted on DAFM-Common "11/15/95". EARS "application worksheet" appeared inadequate; informed Terry Knowles. Hard copy printed of select submitted information: Applicable Requirements, A/R, Methods of Operation, Insignificant Activities, Pollutant Information, and app. contact. Electronic files for TVI equipment and Procedures for start-up/shutdown appear blank.

Rule/Form/ELSA changes pending; "Part IV rulemaking."

Summary checklist for Title IV, Phase II permit applications

Facility Name Auburndale Power Partners, Ltd.

Plant Name: Auburndale Cogeneration receipt date 10/26/95

ORIS Code: S 4 6 S 8 Facility ID No.: 1 0 5 0 2 2 1 (not required)

- | | | |
|--|----------------|----------------|
| a. July 1, 1995 version of application form(s) used? | Y* <u> </u> | N <u>✓</u> |
| b. Four (4) copies of application form(s) submitted? | Y* <u> </u> | N <u> </u> |
| c. Certificate of Representation form on file? | Y* <u>✓</u> | N <u> </u> |
| d. Application form(s) signed by Designated Representative (DR) or alternate DR? | Y* <u> </u> | N <u> </u> |
| e. Original signature of DR or alternate DR on one of 4 forms? | Y* <u> </u> | N <u> </u> |
| f. Modifications made to wording on form(s)? | Y <u> </u> | N* <u> </u> |

Reviewer's initials TMC date 11/21/95

Note(s): [*] = mandatory.

Comment(s): a. 11/22/95 letter.