


Memorandum

Florida Department of  
Environmental Protection

BAR

TO: Howard L. Rhodes

FROM: Trina Vielhauer 

DATE: November 12, 2002

SUBJECT: Auburndale Energy Center.  
Modify SAM Requirements  
DEP File No. 1050221-008-AC  
PSD-FL-185

Attached for approval and signature is a final air construction permit modification for the Auburndale Energy Center. The modification removes the sulfuric acid mist (SAM) requirements.

This project is not subject to PSD because there are no emissions changes associated with the modification.

No comments were received during the public comment period.

I recommend your approval and signature.

December 10, 2002 is day 90.

SMS/  
Attachments

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:  
 Mr. Bob Callery

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Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Mailed  
11/18/02  
Postmark  
Here  
cc: 11/18/02  
Scott H. H. H.

Name (Please Print Clearly) (to be completed by mailer)  
 Mr. Bob Callery  
 Street, Apt. No., or PO Box No.  
 1501 Derby Avenue  
 City, State, ZIP+4  
 Auburndale, Florida 33823

PS Form 3800, July 1999 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Mr. Bob Callery  
 General Manager  
 Calpine Eastern Corporation  
 1501 Derby Avenue  
 Auburndale, Florida 33823

**COMPLETE THIS SECTION ON DELIVERY**

- |  |   |
|--|---|
| A. Received by (Please Print Clearly)<br>Kathleen Whigham                              | B. Date of Delivery<br>11-20-02   |
| C. Signature<br>x Kathleen Whigham   | <input checked="" type="checkbox"/> Agent<br><input type="checkbox"/> Addressee |
| D. Is delivery address different from item 1?<br>If YES, enter delivery address below: | <input type="checkbox"/> Yes<br><input type="checkbox"/> No                     |

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☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2 Article Number (Copy from service label)

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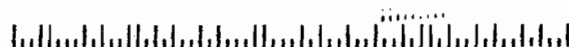
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR RESOURCES MANAGEMENT  
BUREAU OF AIR REGULATION - TITLE V  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

*ms 5505*

BUREAU OF AIR REGULATION

NOV 26 2002

RECEIVED





Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

November 12, 2002

Certified Mail - Return Receipt Requested

Mr. Bob Callery  
General Manager  
Calpine Eastern Corporation  
1501 Derby Avenue  
Auburndale, Florida 33823

Re: DEP File No. **1050221-008-AC, PSD-FL-185**  
**Auburndale Energy Center**

The applicant, Auburndale Power Partners, L.P./Auburndale Power Energy Center, LLC, applied on June 28, 2002, to the Department for an air construction permit for the Auburndale Energy Center, located at 1501 Derby Avenue, Auburndale, Polk County. This permitting action will modify PSD-FL-185. The modification is to: Delete the sulfuric acid mist requirements included in the previous permit, consistent with current practice. The Department has reviewed the applicant's request. Certain specific conditions of permit PSD-FL-185 are hereby modified as follows.

{NOTE: The changes below are shown as they currently appear in the Title V Permit No. 1050221-002-AV; which reflects the SAM requirements from PSD-FL-185 and BACT.}

**From:**

- A.11.** Sulfuric acid mist emissions shall not exceed  
    **a.** while firing natural gas: 7.5 lbs./hour (see note #1); 32.9 TPY (see note #2); and  
    **b.** while firing distillate fuel oil: 14.0 lbs./hour (see note #1); 2.8 TPY (see note #2).  
[Notes: #1 - BACT Determination dated December 14, 1992; #2 - PSD-FL-185]

**To:**

**A.11.** <reserved>

**From:**

**A.27.** Sulfuric Acid Mist. Compliance with the sulfuric acid mist standard shall be demonstrated using EPA Method 8.  
[Rules 62-213.440, 62-297.310, and 62-297.401, F.A.C.; and, PSD-FL-185, revised March 18, 1996]

**To:**

**A.27.** <reserved>

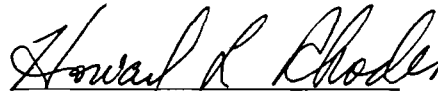
"More Protection, Less Process"

Printed on recycled paper.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director  
Division of Air Resource  
Management

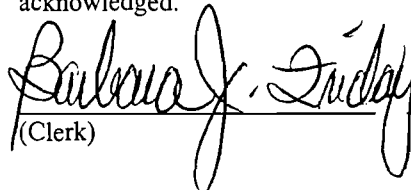
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 11/18/02 to the person(s) listed:

Mr. Bob Callery\*  
Mr. Benjamin M.H. Borsch, P.E.  
Mr. Jeffrey Shaske  
Mr. Jerry Kissel, P.E., SWD  
U.S. EPA, Region 4  
Mr. John Bunyak, NPS

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 11/18/02  
(Clerk) (Date)

TECHNICAL EVALUATION

AND

FINAL DETERMINATION

Auburndale Power Partners, L.P.  
**Auburndale Power Energy Center, LLC**  
Auburndale Energy Center  
Polk County

DEP File No. 1050221-008-AC

**PSD-FL-185**

Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation

# TECHNICAL EVALUATION AND FINAL DETERMINATION

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## 1.0. GENERAL INFORMATION

### 1.1. APPLICANT NAME AND ADDRESS

Calpine Eastern Corporation  
1501 Derby Avenue  
Auburndale, Florida 33823

Responsible Official: Mr. Bob Callery, General Manager

### 1.2. REVIEW AND PROCESS SCHEDULE

June 28, 2002	Permit application received (Combined w/ Title V Permit Renewal).
July 30, 2002	Application deemed incomplete.
August 12&14, 2002	Supplemental information received.
August 14, 2002	Application deemed complete.
September 25, 2002	Intent to Issue clerked.
October 7, 2002	Public notice published.
October 14, 2002	Proof of publication received.
November 6, 2002	End of public comment period (day 30).

## 2.0. FACILITY INFORMATION

The facility is located at 1501 Derby Avenue, Auburndale, Polk County. UTM Coordinates are: Zone 17, 418.7 km East, and 3083.0 km North; Latitude: 27° 52' 15" North, and Longitude: 81° 49' 31" West.

SIC codes are:

Industry Group No.	49	Electric, Gas and Sanitary Services
Industry No.	4911	Electric Generation

The modification request is to delete the sulfuric acid mist requirements included in the previous permit, consistent with current DEP practice.

The Auburndale Energy Center consists of two collocated combustion turbines along with ancillary and supporting equipment and facilities. One turbine, the Auburndale Cogeneration unit, owned by Auburndale Power Partners, L.P. (APP) is a 156 (nominal) MW unit operated in combined cycle with an unfired heat recovery steam generator. This unit also generates steam for use by two adjacent manufacturing facilities. The second turbine, owned by Auburndale Peaker Energy Center, LLC (APEC) is a 104 (nominal) MW unit operated in simple cycle. Calpine Eastern Corporation operates both of these units.

This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

The facility was issued a previous PSD permit, PSD-FL-185.

This facility *is not* a major source of hazardous air pollutants (HAPs).

# TECHNICAL EVALUATION AND FINAL DETERMINATION

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## 3.0. PROJECT DESCRIPTION

The applicant proposes no equipment changes to the configuration of the facility. The requested permit changes are noted above in section 2.0.

## 4.0. PROJECT EMISSIONS & RULE APPLICABILITY

There are no pollutant emission changes associated with this project.

The sulfuric acid mist (SAM) emission limitations were established by the BACT determination dated December 14, 1992. In that determination the department claimed to have accepted the applicant's BACT proposal for SAM, which was the use of low sulfur fuel oil with limited hours.

The original BACT determination issued was based on 8,760 hours of operation on fuel oil even though the PSD permit restricted the operation of fuel oil to 400 hours/year. The maximum SAM emissions calculated based on 400 hours/year is 1.5 TPY, which does not exceed the PSD significant emission rate of 7 TPY. In conclusion, the original BACT determination was incorrect, i.e., SAM emissions did not exceed the PSD significant emission rate. This permitting action corrects the original BACT by deleting the SAM requirements.

This change constitutes a minor modification of PSD permit number PSD-FL-185. Therefore, the modification is not subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), so neither a revised Best Available Control Technology (BACT) determination nor an analysis of the air quality impact is required. However, because this project requires a modification of a PSD permit, the public notice requirements for PSD permits are applicable.

The proposed project is otherwise subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

The facility is located in an area (Polk County) designated "unclassifiable" for PM<sub>10</sub>, and "attainment" for all the other criteria pollutants (Rule 62-204.340, F.A.C.).

The emission unit affected by this permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein).

## 5.0. Final Determination

An "INTENT TO ISSUE A COMBINED AIR CONSTRUCTION PERMIT/TITLE V OPERATION PERMIT RENEWAL" was clerked on September 25, 2002. The "PUBLIC NOTICE OF INTENT TO ISSUE A COMBINED AIR CONSTRUCTION PERMIT/TITLE V OPERATION PERMIT RENEWAL" was published in the Lakeland Ledger – East Polk section on October 7<sup>th</sup>. The Draft Air Construction Permit was available for public inspection at the Southwest District office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A COMBINED AIR CONSTRUCTION PERMIT/TITLE V OPERATION PERMIT RENEWAL" was received on October 14, 2002.

No comments were received during the thirty (30) day public comment period. As a result, the permit will be issued, as noticed.