



MEMORANDUM

TO: Scott M. Sheplak, P.E.

FROM:  Joseph Kahn, P.E.,  Susan C. DeVore

DATE: July 25, 1997

RE: Intent package for DRAFT Permit No.: 1050231-001-AV
Orange Cogeneration L.P.
Orange Cogeneration Facility

This permit is for the initial Title V air operation permit for the subject facility which is a cogeneration facility with two combustion turbines and an auxiliary boiler. The turbines are regulated under BACT (PSD) and NSPS Subpart GG. The auxiliary boiler is regulated under BACT (PSD). Unregulated emissions units include oil storage tanks and vents.

No additional information was requested. This application was complete on the date received, June 17, 1996. Written comments were not received from the SW District.

This facility reported that each emissions unit was in compliance at the time of the application.

The requirements of the PSD permit for the turbines are more restrictive than the NSPS Subpart GG requirements. We drafted the permit to reflect primarily the PSD requirements with a note, where appropriate, indicating that compliance with the NSPS requirements would be assured by satisfying the PSD requirements. The requirements for fuel monitoring were eliminated, for example, because the applicant has agreed to utilize NO_x CEMS to monitor for excess emissions. The applicant had included a custom fuel monitoring schedule, but the schedule was not included in the draft permit. Some PSD requirements were re-written to simplify the permit such as the limitation on operation if not tested at capacity, which now requires a reduction in the allowable operation curve for the turbine instead of a reduced NO_x limit. Another change is that the requirement to submit curves of emissions versus operation rate was eliminated to clarify that the emissions limits are applicable at all operation rates. The requirements of draft construction permit 1050231-002-AC that extends the date that lower NO_x limits are imposed on the turbines have been incorporated into this permit. We anticipate that AC permit will become final prior to the effective date of this permit.

Minor changes were made to the PSD requirements for the auxiliary boiler for simplification.

The facility is currently subject to the acid rain program. The applicant identified the turbines and auxiliary boiler as subject to acid rain in the Phase II application. The applicant subsequently requested EPA confirm that the facility is exempt from acid rain requirements. Upon issuance of that exemption the acid rain part of this permit shall no longer apply.

We recommend that this Intent to Issue be sent out as attached.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

P.E. Certification Statement

Orange Cogeneration L.P.
Orange Cogeneration Facility

DRAFT Permit No.: 1050231-001-AV
Facility ID No.: 1050231

Project type: Initial Title V Air Operation Permit

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions, provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

This review was conducted by myself and Susan C. DeVore under my responsible supervision.

(Seal)


Joseph Kaan

7/25/97

Date

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 28, 1997

Mr. Allan W. Smith
General Manager
Orange Cogeneration Limited Partnership
1125 US 98 South, Suite 100
Lakeland, FL 33801

Re: DRAFT Title V Permit No.: 1050231-001-AV
Orange Cogeneration Facility

Dear Mr. Smith:

One copy of the DRAFT Title V Air Operation Permit for the Orange Cogeneration Facility located at 1901 Clear Springs Road, Bartow, Polk County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Joseph Kahn, P.E., at 850/488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/jk

enclosures

Z 127 635 511



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to Mr. Allan W. Smith	
Street and No. 1125 US 98 South, Suite 10	
P.O., State and ZIP Code Lakeland, Florida 33801	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 7/30/97	



Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to Mr. Dennis Oehring	
Street and No. 1125 US 98 South, Suite 10	
P.O., State and ZIP Code Lakeland, Florida 33801	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 7/30/97	

UNITED STATES POSTAL SERVICE

Official Business

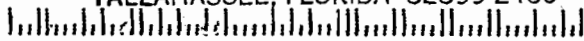
RECEIVED

AUG 4 1997

BUREAU OF
AIR REGULATION

Print your name, address and ZIP Code here

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



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



UNITED STATES POSTAL SERVICE

Official Business

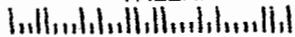


PENALTY FOR PRIVATE
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Print your name, address and ZIP Code here

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



Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Allan W. Smith
General Manager
Orange Cogeneration Limited
Partnership
1125 US 98 South, Suite 100
Lakeland, Florida 33801

4a. Article Number
2 127 635 511

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
8-1-97

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Tom Mulne

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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3. Article Addressed to:
Mr. Dennis Oehring
Orange Cogeneration Limited
Partnership
1125 US 98 South, Suite 100
Lakeland, Florida 33801

4a. Article Number
2 127 635 512

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
8-4-97

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Ante Upodid

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service

In the Matter of an
Application for Permit by:

Orange Cogeneration Limited Partnership
1125 US 98 South, Suite 100
Lakeland, FL 33801

DRAFT Permit No.: 1050231-001-AV
Orange Cogeneration Facility
Polk County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Orange Cogeneration Limited Partnership, applied on June 17, 1996, to the permitting authority for a Title V air operation permit for the Orange Cogeneration Facility located at 1901 Clear Springs Road, Bartow, Polk County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-1344; Fax: 850/922-6979), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., or a party requests mediation as an alternative remedy under Section 120.573, F.S., before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority or the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the permitting authority's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department of Environmental Protection a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

(a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;

(b) A statement of the preliminary agency action;

(c) A statement of the relief sought; and,

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

(a) The names, addresses, and telephone numbers of any persons who may attend the mediation;

(b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;

(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

(f) The name of each party's representative who shall have authority to settle or recommend settlement; and,

(g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573, F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57, F.S., for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within 60 (sixty) days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department of Environmental Protection must enter an order incorporating the agreement of the parties in accordance with the provisions of Section 403.0872(7), F.S. If mediation terminates without settlement of the dispute, the permitting authority shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57, F.S., remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;

(c) Each rule or portion of a rule from which a variance or waiver is requested;

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;

(e) The type of action requested;

(f) The specific facts that would justify a variance or waiver for the petitioner;

(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

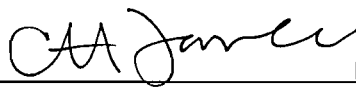
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on 7/30/97 to the person(s) listed:

Mr. Allan W. Smith, Orange Cogeneration
Mr. Dennis Oehring, Orange Cogeneration

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail, unless otherwise indicated, on the same date to the person(s) listed:

Mr. Kennard F. Kosky, P.E., Golder Associates
Mr. Bill Thomas, P.E., Southwest District, DEP
Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Boutwell 7/30/97
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V DRAFT Permit No.: 1050231-AV
Orange Cogeneration Facility
Polk County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Orange Cogeneration Limited Partnership for the Orange Cogeneration Facility located at 1901 Clear Springs Road, Bartow, Polk County. The applicant's name and address are: Orange Cogeneration Limited Partnership, Mr. Allan W. Smith, 1125 US 98 South, Suite 100, Lakeland, FL 33801.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.), or a party requests mediation as an alternative remedy under Section 120.573, F.S., before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;

(d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the permitting authority's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department of Environmental Protection a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000, by the same deadline as set forth above for the filing of a petition.

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(c) A statement of the relief sought; and,

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

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(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

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(g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573, F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57, F.S., for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within 60 (sixty) days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department of Environmental Protection must enter an order incorporating the agreement of the parties in accordance with the provisions of Section 403.0872(7), F.S. If mediation terminates without settlement of the dispute, the permitting authority shall notify all parties in writing that the

administrative hearing processes under Sections 120.569 and 120.57, F.S., remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979

Affected District/Local Program:

Department of Environmental Protection
Southwest District Office
8407 Laurel Fair Circle
Tampa, FL 33619
Telephone: 813/744-6100
Fax: 813/744-6458

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.

Orange Cogeneration Limited Partnership
Orange Cogeneration Facility
Facility ID No.: 1050231
Polk County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1050231-001-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344
Fax: 850/922-6979

July 28, 1997

Initial Title V Air Operation Permit
DRAFT Permit No.: 1050231-001-AV

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Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

Permittee:

Orange Cogeneration Limited Partnership
1901 Clear Springs Road
Bartow, FL 33830

DRAFT Permit No.: 1050231-001-AV

Facility ID No.: 1050231

SIC Nos.: 49, 4911

Project: Initial Title V Air Operation Permit

This permit is for the operation of the Orange Cogeneration Facility. This facility is located at 1901 Clear Springs Road, Bartow, Polk County; UTM Coordinates: Zone 17, 418.7 km East and 3083.0 km North; Latitude: 27° 52' 15" North and Longitude: 81° 49' 31" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-i, List of Unregulated Emissions Units and/or Activities

Appendix E-1, List of Exempt Emissions Units and/or Activities

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix TV-1, Title V Conditions (version dated 2/27/97)

Appendix SS-1, Stack Sampling Facilities (version dated 10/07/96)

Table 297.310-1, Calibration Schedule (version dated 10/07/96)

Figure 1 - Summary Report-Gaseous And Opacity Excess Emission And Monitoring System
Performance Report (version dated 7/96)

Phase II Acid Rain Application/Compliance Plan received 1/2/96

Effective Date: January 1, 1998

Renewal Application Due Date: July 5, 2002

Expiration Date: December 31, 2002

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sms/jk

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two combustion turbines (CT) that each exhaust through a heat recovery steam generator (HRSG) and associated stack. The CTs are natural gas and biogas fired. The facility also includes an auxiliary boiler fired with natural gas and biogas, with a separate stack. Neither HRSG is auxiliary fuel fired or equipped with duct burners.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 17, 1996, this facility not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Combustion Turbine (CT) with HRSG, Unit 1
002	Combustion Turbine (CT) with HRSG, Unit 2
003	Auxiliary Boiler

Unregulated Emissions Units and/or Activities	
004	Storage of Lube Oil, Waste Oil and Diesel Fuel
005	Lube Oil Vapor Extractor, Lube Oil Air/Oil Separator, Steam Turbine Drain Flash Tank

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

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

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History/ID Number Changes
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:
Initial Title V Permit Application received June 17, 1996
Additional Information Letter received June 16, 1997
Letter dated June 6, 1997 changing the Facility Contact
Letter dated January 15, 1997 changing the Designated Representative

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS (version dated 2/27/97), is a part of this permit. {Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C., PSD-FL-204B]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)1. & 4, F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
 - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
 - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
7. **Not Federally Enforceable.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The owner or operator shall:
 - a. Tightly cover or close all VOC or OS containers when they are not in use.
 - b. Tightly cover all open tanks which contain VOC or OS when they are not in use.

- c. Maintain all pipes, valves, fittings, etc., which handle VOC or OS in good operating condition.
- d. Immediately confine and clean up VOC or OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.]

8. Not Federally Enforceable. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Maintenance of paved areas as needed.
- b. Regular mowing of grass and care of vegetation.
- c. Limiting access to plant property by unnecessary vehicles.
- d. Bagged chemical products are stored in weather-tight buildings until they are used.
- e. Spills of powdered chemical products are cleaned up as soon as practicable.

[Rule 62-296.320(4)(c)2., F.A.C.; Items a, b, and c were proposed by the applicant in the initial Title V permit application received June 17, 1996]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District office.

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

001	Combined cycle gas turbine, Unit 1, a GE LM 6000 DLE unit, rated at 41.4 MW at 47°F, with an associated heat recovery steam generator that services (with Unit 2's HRSG) an electric steam generator rated at 37 MW. The HRSG also furnishes steam to a juice processing facility. The HRSG is not fired with auxiliary fuel. The turbine's heat input is 368.3 mmBtu/hr for natural gas or biogas, and is capable of burning only natural gas or biogas, with emissions exhausted through a 100 ft. stack.
002	Combined cycle gas turbine, Unit 2, a GE LM 6000 DLE unit, rated at 41.4 MW at 47°F, with an associated heat recovery steam generator that services (with Unit 1's HRSG) an electric steam generator rated at 37 MW. The HRSG also furnishes steam to a juice processing facility. The HRSG is not fired with auxiliary fuel. The turbine's heat input is 368.3 mmBtu/hr for natural gas or biogas, and is capable of burning only natural gas or biogas, with emissions exhausted through a 100 ft. stack.

{Permitting notes: These emissions units are regulated under Acid Rain, Phase II* and Rule 62-210.300, F.A.C., Permits Required and are subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. The affected facilities to which this subpart applies are the combined cycle gas turbines, Units 1 and 2. Each unit underwent a revised BACT Determination dated March 7, 1995. BACT Limits were incorporated into the subsequent PSD permits including AC53-233851B (PSD-FL-206B), which superseded previous construction permits. The requirements of construction permit 1050231-002-AC, which extends the date that lower NOx limits are imposed, has been incorporated into this permit. Exhaust is vented through the heat recovery steam generator that is not equipped with duct burners and then through a 100 ft. stack. Emissions are controlled by dry low-NOx combustors. The turbines began commercial operation in 1995.}

* The permittee has requested EPA exempt these units from regulation under Title IV as acid rain units. Upon written confirmation that these units are not regulated under Title IV, the acid rain section of this permit (Section IV) shall no longer apply. The remainder of this permit shall remain in effect.

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
001	368.3*	Natural Gas or Biogas
002	368.3*	Natural Gas or Biogas

* Maximum heat input at 47°F and lower heating value of the fuel.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and AC53-233851B (PSD-FL-206B)]

A.2. Emissions Units Operating Rate Limitation After Testing. See specific condition **A.9.**
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation - Fuels. Any combination of natural gas and biogas shall be fired in the combustion turbine.
{Note: The limitations of specific conditions **A.3** and **A.5** are more stringent than the NSPS sulfur dioxide limitation and thus assure compliance with 40 CFR 60.333 and 60.334.}
[Rule 62-213.410, F.A.C.]

Emission Limitations and Standards

A.4. Visible Emissions Visible emissions shall not exceed 10% opacity.
[AC53-233851B (PSD-FL-206B)]

A.5. Sulfur Dioxide - Sulfur Content. The natural gas and biogas sulfur content shall not exceed 1 grain per hundred cubic feet (standard conditions). See specific condition **A.12.**
{Note: The limitations of specific conditions **A.3** and **A.5** are more stringent than the NSPS sulfur dioxide limitation and thus assure compliance with 40 CFR 60.333 and 60.334. The sulfur limitation on natural gas and biogas have been added to assure compliance with 40 CFR 60.333.}
[Rules 62-4.070(3) and 62-213.440, F.A.C., and AC53-233851B (PSD-FL-206B)]

A.6. Emission Limits. The maximum allowable emissions from each unit shall not exceed the emission limitations listed below.

Pollutant	Emission Limits			Basis
	Natural Gas or Biogas	lb/hr	Tons/Year	
NO _x	25 ppmvd at 15% oxygen, prior to January 1, 1999	37.0	161.9	BACT
NO _x	15 ppmvd at 15% oxygen, January 1, 1999 and thereafter	22.1	97.0	BACT
CO	30 ppmvd	27.8	127.0	BACT
PM/PM ₁₀ *		5	21.9	BACT
VOC	10 ppmvd	3.98	17.4	BACT

* All PM is assumed to be PM₁₀.

{Note: The limitations of specific condition **A.6** are more stringent than the NSPS nitrogen oxides limitation and thus ensure compliance with 40 CFR 60.332 and 60.334.}
[AC53-233851B (PSD-FL-206B) and 1050231-002-AC]

Test Methods and Procedures

A.7. Annual Compliance Tests. Emission testing for visible emissions and nitrogen oxides shall be performed annually, no later than March 31st of each year, in accordance with specific condition **A.9**, with the fuel(s) used for more than 400 hours in the preceding 12-month period.

Tests shall be conducted using the following EPA reference methods in accordance with 40 CFR 60, Appendix A:

- a. Method 9 for VE;
- b. Method 20 for NOx.

If the unit is not operating because of scheduled maintenance outages and emergency repairs, it shall be tested within thirty days of returning to service.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and AC53-233851B (PSD-FL-206B)]

A.8. Testing for PM, CO, VOC. Emission testing for emissions of particulate matter, carbon monoxide and VOC shall be performed in the year prior to renewal of this permit, in accordance with specific condition A.9. Particulate matter tests shall be conducted using EPA test methods 5 or 17. Method 17 may be used if the stack flue gas temperature is less than 320°F. Carbon monoxide tests shall be conducted using EPA test method 10. VOC tests shall be conducted using EPA test methods 18 or 25A.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and AC53-233851B (PSD-FL-206B)]

A.9. Additional Test Requirements. Test results shall be the average of three valid runs. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 95-100 percent of the maximum heat input rate allowed by this permit, achievable for the average ambient air temperature during the test. If it is impracticable to test at permitted capacity, the emissions unit may be tested at less than permitted capacity. In such cases, subsequent operation is limited by adjusting downward the entire heat input vs. inlet temperature curve by the increment equal to the difference between the maximum permitted heat input value and 105 percent of the value reached during the test. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report.

Tests shall be conducted on both natural gas and biogas fuels (provided biogas fuels become available) unless previous test results or fuel analysis documents that emissions are independent of fuel fired, in which case tests may be conducted on either fuel.

[AC53-233851B (PSD-FL-206B) and 1050231-002-AC; this condition is intended to simplify the requirements of specific condition 16 of AC53-233851B]

Monitoring of Operations

A.10. Continuous Monitoring Required. A continuous monitoring system shall be maintained to record fuel consumption. A continuous monitoring system shall be maintained to record oxygen content and emissions of nitrogen oxides in accordance with the requirements of 40 CFR 75. NOx emissions shall be reported in terms of ppmvd corrected to 15% oxygen.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and AC53-233851B (PSD-FL-206B)]

A.11. Excess Emissions by CEMS. The CEMS for NOx shall be used to determine periods of excess emissions. Excess emissions are defined for this emissions unit as any 60-minute period during which the average emissions exceed the emission limits of specific condition A.6 of this

permit. Periods of startup, shutdown, malfunction shall be monitored, recorded and reported with excess emissions following the format and requirements of 40 CFR 60.7.

{Note: The requirements of specific condition **A.11** are more stringent than the NSPS monitoring provisions and thus assure compliance with 40 CFR 60.334 and 60.335.}

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

Record Keeping and Reporting Requirements

A.12. Fuel Sulfur Content Records Required. The owner or operator shall receive and maintain records of sulfur content of natural gas provided by the natural gas supplier, as measured by ASTM method D1072-80 or other applicable ASTM test methods, at minimum twice each month. The records shall report total sulfur content in terms of grains of sulfur per hundred cubic feet (standard conditions). The owner or operator shall make and maintain records of sulfur content of biogas at minimum twice each month. The records shall report total sulfur content of biogas in terms of grains of sulfur per hundred cubic feet (standard conditions) as measured by ASTM method D1072-80 or other applicable ASTM test methods.

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

A.13. Additional Reports Required. The owner or operator shall report the following with the Air Operating Report (AOR): sulfur content and lower heating value of the fuel being fired, annual fuel consumption of natural gas and biogas, and hours of operation per fuel usage.

The owner or operator shall provide the Department quarterly reports regarding the progress toward attaining the allowable NOx emission limit of 15 ppmvd at 15% oxygen until such emission limit is attained. Reports shall be submitted to the Southwest District Air Section with a copy to the Department's Bureau of Air Regulation.

[Rule 62-210.370(3), F.A.C., AC53-233851B (PSD-FL-206B) and 1050231-002-AC]

NSPS Conditions

{Note: The emissions units above are subject to the following conditions from 40 CFR 60 Subpart A, General Provisions. The affected facilities to which this subpart applies are the combined cycle gas turbines, Units 1 and 2.}

The following conditions apply to the NSPS emissions units listed above:

A.14. Pursuant to 40 CFR 60.7 Notification And Record Keeping.

(a) Any owner or operator subject to the provisions of this part shall furnish the Administrator written notification as follows:

(4) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

(b) The owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

(c) The owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form (see 40 CFR 60.7(d)) to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or the CMS data are to be used directly for compliance determination, in which case quarterly reports shall be submitted; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each calendar half (or quarter, as appropriate). Written reports of excess emissions shall include the following information:

(1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

(3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

(4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

(d) The summary report form shall contain the information and be in the format shown in Figure 1 unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility.

(1) If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator.

(2) If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.

[See Attached Figure 1-Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance]

(e)(1) Notwithstanding the frequency of reporting requirements specified in paragraph (c) of this section, an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:

(i) For one full year (e.g., four quarterly or twelve monthly reporting periods) the affected facility's excess emissions and monitoring systems reports submitted to comply with a standard

under this part continually demonstrate that the facility is in compliance with the applicable standard;

(ii) The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in this subpart and the applicable standard; and

(iii) The Administrator does not object to reduced frequency of reporting for the affected facility, as provided in paragraph (e)(2) of this section.

(2) The frequency of reporting of excess emissions and monitoring systems performance (and summary) reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the required recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

(3) As soon as monitoring data indicate that the affected facility is not in compliance with any emission limitation or operating parameter specified in the applicable standard, the frequency of reporting shall revert to the frequency specified in the applicable standard, and the owner or operator shall submit an excess emissions and monitoring systems performance report (and summary report, if required) at the next appropriate reporting period following the noncomplying event. After demonstrating compliance with the applicable standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard as provided for in paragraphs (e)(1) and (e)(2) of this section.

(f) The owner or operator subject to the provisions of this part shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.

[40 CFR 60.7 and Rule 62-213.440(1)(b)2.b., F.A.C.]

A.15. Pursuant to 40 CFR 60.8 Performance Tests.

(b) Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart.

(c) Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit

during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

(f) Unless otherwise specified in the applicable subpart, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Administrator's approval, be determined using the arithmetic mean of the results of the two other runs.

[40 CFR 60.8]

A.16. Pursuant to 40 CFR 60.11 Compliance With Standards And Maintenance Requirements.

(a) Compliance with standards in this part, other than opacity standards, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.

(b) Compliance with opacity standards in this part shall be determined by conducting observations in accordance with Reference Method 9 in appendix A of this part, any alternative method that is approved by the Administrator, or as provided in 40 CFR 60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

(c) The opacity standards set forth in this part shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

(d) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(e)(5) The owner or operator of an affected facility subject to an opacity standard may submit, for compliance purposes, continuous opacity monitoring system (COMS) data results produced during any performance test required under 40 CFR 60.8 in lieu of Method 9 observation data. If an owner or operator elects to submit COMS data for compliance with the opacity standard, he shall notify the Administrator of that decision, in writing, at least 30 days before any performance test required under 40 CFR 60.8 is conducted. Once the owner or operator of an affected facility has notified the Administrator to that effect, the COMS data results will be used to determine opacity compliance during subsequent tests required under 40 CFR 60.8 until the owner or operator notifies the Administrator, in writing, to the contrary. For the purpose of determining compliance with the opacity standard during a performance test required under 40 CFR 60.8 using COMS data, the minimum total time of COMS data collection shall be averages of all 6-minute continuous periods within the duration of the mass emission performance test. Results of the COMS opacity determinations shall be submitted along with the results of the performance test required under 60.8. The owner or operator of an affected facility using a COMS for compliance purposes is responsible for demonstrating that the COMS meets the

requirements specified in 40 CFR 60.13(c), that the COMS has been properly maintained and operated, and that the resulting data have not been altered in any way. If COMS data results are submitted for compliance with the opacity standard for a period of time during which Method 9 data indicates noncompliance, the Method 9 data will be used to determine opacity compliance. [40 CFR 60.11]

A.17. Pursuant to 40 CFR 60.12 Circumvention.

No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[40 CFR 60.12]

A.18. Pursuant to 40 CFR 60.13 Monitoring Requirements.

(a) For the purposes of this section, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of this section upon promulgation of performance specifications for continuous monitoring systems under appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, appendix F to 40 CFR 60, unless otherwise specified in an applicable subpart or by the Administrator. Appendix F is applicable December 4, 1987.

(c) If the owner or operator of an affected facility elects to submit continuous opacity monitoring system (COMS) data for compliance with the opacity standard as provided under 40 CFR 60.11(e)(5), he/she shall conduct a performance evaluation of the COMS as specified in Performance Specification 1, appendix B, of 40 CFR 60 before the performance test required under 40 CFR 60.8 is conducted. Otherwise, the owner or operator of an affected facility shall conduct a performance evaluation of the COMS or continuous emission monitoring system (CEMS) during any performance test required under 40 CFR 60.8 or within 30 days thereafter in accordance with the applicable performance specification in appendix B of 40 CFR 60. The owner or operator of an affected facility shall conduct COMS or CEMS performance evaluations at such other times as may be required by the Administrator under section 114 of the Act.

(1) The owner or operator of an affected facility using a COMS to determine opacity compliance during any performance test required under 40 CFR 60.8 and as described in 40 CFR 60.11(e)(5), shall furnish the Administrator two or, upon request, more copies of a written report of the results of the COMS performance evaluation described in 40 CFR 60.13(c) at least 10 days before the performance test required under 40 CFR 60.8 is conducted.

(2) Except as provided in 40 CFR 60.13(c)(1), the owner or operator of an affected facility shall furnish the Administrator within 60 days of completion two or, upon request, more copies of a written report of the results of the performance evaluation.

(d)(1) Owners and operators of all continuous emission monitoring systems installed in accordance with the provisions of this part shall check the zero (or low-level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span shall, as a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in appendix B. The system must allow the amount of

excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified, whenever specified. For continuous monitoring systems measuring opacity of emissions, the optical surfaces exposed to the effluent gases shall be cleaned prior to performing the zero and span drift adjustments except that for systems using automatic zero adjustments. The optical surfaces shall be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity.

(2) Unless otherwise approved by the Administrator, the following procedures shall be followed for continuous monitoring systems measuring opacity of emissions. Minimum procedures shall include a method for producing a simulated zero opacity condition and an upscale (span) opacity condition using a certified neutral density filter or other related technique to produce a known obscuration of the light beam. Such procedures shall provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photo detector assembly.

(e) Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows:

(1) All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring opacity of emissions shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.

(2) All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

(f) All continuous monitoring systems or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Additional procedures for location of continuous monitoring systems contained in the applicable Performance Specifications of appendix B of 40 CFR 60 shall be used.

(g) When the effluents from a single affected facility or two or more affected facilities subject to the same emission standards are combined before being released to the atmosphere, the owner or operator may install applicable continuous monitoring systems on each effluent or on the combined effluent. When the affected facilities are not subject to the same emission standards, separate continuous monitoring systems shall be installed on each effluent. When the effluent from one affected facility is released to the atmosphere through more than one point, the owner or operator shall install an applicable continuous monitoring system on each separate effluent unless the installation of fewer systems is approved by the Administrator. When more than one continuous monitoring system is used to measure the emissions from one affected facility (e.g., multiple breechings, multiple outlets), the owner or operator shall report the results as required from each continuous monitoring system.

(h) Owners or operators of all continuous monitoring systems for measurement of opacity shall reduce all data to 6-minute averages and for continuous monitoring systems other than opacity to 1-hour averages for time periods as defined in 40 CFR 60.2. Six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each 6-minute period. For continuous monitoring systems other than opacity, 1-hour averages shall be computed from four or more data points equally spaced over each 1-hour period. Data recorder during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages computed under this paragraph. An arithmetic or integrated average of all data may be used. The data may be recorded in reduced or non reduced form (e.g., ppm pollutant and percent O₂ or ng/J of pollutant). All excess emissions

shall be converted into units of the standard using the applicable conversion procedures specified in subparts. After conversion into units of the standard, the data may be rounded to the same number of significant digits as used in the applicable subparts to specify the emission limit (e.g., rounded to the nearest 1 percent opacity).

[40 CFR 60.13]

A.19. Pursuant to 40 CFR 60.17 Incorporations by Reference.

The materials listed below are incorporated by reference in the corresponding sections noted.

[Note: The remainder of this section has not been reproduced in this permit for brevity. See 40 CFR 60.17 for materials incorporated by reference.]

[40 CFR 60.17]

Other Conditions

A.20. These emissions units are also subject to conditions C.1 through C.14 contained in Subsection C. Common Conditions.

Subsection B. This section addresses the following emissions unit(s).

003	This emissions unit consists of an auxiliary boiler, a two drum bent tube boiler, manufactured by Zurn Nepco, with a maximum heat input of 100 mmBtu/hr for natural gas or biogas, capable of burning either natural gas or biogas.
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{Permitting notes: This emissions unit is regulated under Acid Rain, Phase II* and Rule 62-210.300, F.A.C., Permits Required. This emissions unit is subject to only the record keeping requirements of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, because it combusts only natural gas or biogas. This unit underwent a revised BACT Determination dated March 7, 1995. BACT Limits were incorporated into the subsequent PSD permits including AC53-233852A (PSD-FL-206B), which superseded previous construction permits. Exhaust is vented through a 65 ft. stack. Emissions are controlled with low NOx burners. The boiler began commercial operation in 1995.}

* The permittee included this unit in the Phase II acid rain application. The permittee has requested EPA exempt this unit from regulation under Title IV as an acid rain unit. Upon written confirmation that this unit is not regulated under Title IV, the acid rain section of this permit (Section IV) shall no longer apply. The remainder of this permit shall remain in effect.

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
003	100*	Natural Gas or Biogas

* Based on the higher heating value of the fuel.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and AC53-233852A (PSD-FL-206B)]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.9.**
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation - Fuels. The auxiliary boiler shall be fired with any combination of natural gas and biogas.
[Rule 62-213.410, F.A.C., and AC53-233852A (PSD-FL-206B)]

Emission Limitations and Standards

B.4. Visible Emissions Visible emissions shall not exceed 15% opacity.
[AC53-233852A (PSD-FL-206B)]

B.5. Sulfur Dioxide - Sulfur Content. The natural gas and biogas sulfur content shall not exceed 1 grain per hundred cubic feet (standard conditions). See specific condition **B.10.**
[Rules 62-4.070(3) and 62-213.440, F.A.C., and AC53-233852A (PSD-FL-206B)]

B.6. Emission Limits. The maximum allowable emissions from each unit shall not exceed the emission limitations listed below.

Pollutant	Emission Limits		
	Natural Gas or Biogas	lb/hr	Tons/Year
NOx	0.13 lb/mmBtu	13.0	56.9
CO	0.10 lb/mmBtu	10.0	43.8
VOC	0.04 lb/mmBtu	4.3	18.8
PM/PM ₁₀ *	0.01 lb/mmBtu	1.0	4.4
SO ₂ **	0.003 lb/mmBtu	0.30	1.3

* All PM is assumed to be PM₁₀; the PM limitation shall be considered to be met if visible emissions are not greater than 15% opacity.

** The sulfur dioxide limitation shall be considered to be met if the total sulfur content of the natural gas and biogas fuels does not exceed 1 grain per hundred cubic feet (standard conditions).

[AC53-233851B (PSD-FL-206B)]

Test Methods and Procedures

B.7. Annual Compliance Tests. Emission testing for visible emissions and nitrogen oxides shall be performed annually, no later than March 31st of each year, in accordance with specific condition **B.9**, with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using the following EPA reference methods in accordance with 40 CFR 60, Appendix A:

- a. Method 9 for VE;
- b. Method 7E for NOx.

If the unit is not operating because of scheduled maintenance outages and emergency repairs, it shall be tested within thirty days of returning to service.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and AC53-233852A (PSD-FL-206B)]

B.8. Testing for PM, CO, VOC. Emission testing for emissions of particulate matter, carbon monoxide and VOC shall be performed in the year prior to renewal of this permit, in accordance with specific condition **B.9**. Particulate matter tests shall be conducted using EPA test methods 5 or 17. Method 17 may be used if the stack flue gas temperature is less than 320°F. Testing for particulate matter is not required if visible emissions are not greater than 15% opacity. Carbon monoxide tests shall be conducted using EPA test method 10. VOC tests shall be conducted using EPA test methods 18 or 25A.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and AC53-233852A (PSD-FL-206B)]

B.9. Additional Test Requirements. Test results shall be the average of three valid runs. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90-100 percent of the maximum heat input rate allowed by this permit. If it is impracticable to test at permitted capacity, the emissions unit may be tested at less than permitted capacity. In such cases, subsequent operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional

compliance testing to regain the authority to operate at the permitted capacity, with prior notification to the Department.

Tests shall be conducted on both natural gas and biogas fuels (provided biogas fuels become available) unless previous test results or fuel analysis documents that emissions are independent of fuel fired, in which case tests may be conducted on either fuel.

[Rules 62-297.310(2) & (2)(b), F.A.C., and AC53-233852A (PSD-FL-206B)]

Record Keeping and Reporting Requirements

B.10. Fuel Sulfur Content Records Required. The owner or operator shall receive and maintain records of sulfur content of natural gas provided by the natural gas supplier, as measured by ASTM method D1072-80 or other applicable ASTM test methods, at minimum twice each month. The records shall report total sulfur content in terms of grains of sulfur per hundred cubic feet (standard conditions). The owner or operator shall make and maintain records of sulfur content of biogas at minimum twice each month. The records shall report total sulfur content of biogas in terms of grains of sulfur per hundred cubic feet (standard conditions) as measured by ASTM method D1072-80 or other applicable ASTM test methods.

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

B.11. Fuel Usage Records Required. The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.

[40 CFR 60.7 and 60.48c(g), and Rule 62-213.440(1)(b)2.b., F.A.C.]

B.12. Additional Reports Required. The owner or operator shall report the following with the Air Operating Report (AOR): sulfur content and higher heating value of the fuel being fired, annual fuel consumption of natural gas and biogas, and hours of operation per fuel usage.

[Rule 62-210.370(3), F.A.C., and AC53-233852A (PSD-FL-206B)]

Other Conditions

B.13. These emissions units are also subject to conditions C.1 through C.14 contained in **Subsection C. Common Conditions.**

Subsection C. Common Conditions.

E.U. ID No.	Brief Description
001	Combined cycle gas turbine, Unit 1
002	Combined cycle gas turbine, Unit 2
003	Auxiliary boiler

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Hours of Operation. The emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Excess Emissions

C.2. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

C.3. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.]

C.4. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

C.5. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

C.6. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant

emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.7. Visible Emissions. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.

[Rules 62-204.800 and 62-297.401, F.A.C.]

C.8. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

C.9. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

C.10. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

C.11. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

Record Keeping and Reporting Requirements

C.12. Malfunctions - Notification. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Southwest District Air Section in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Southwest District Air Section.

[Rule 62-210.700(6), F.A.C.]

C.13. Excess Emissions - Report. Submit to the Southwest District Air Section a written report of emissions in excess of emission limiting standards as set forth in this permit, for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations.

[Rule 62-213.440, F.A.C.]

C.14. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Southwest District Air Section on the results of each such test.
- (b) The required test report shall be filed with the Southwest District Air Section as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Southwest District Air Section to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.

20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Section IV. This section is the Acid Rain Part.

Operated by: Orange Cogeneration Facility
ORIS code: 54365

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

E.U. ID No.	Brief Description
001	Combined cycle gas turbine, Unit 1
002	Combined cycle gas turbine, Unit 2
003	Auxiliary boiler

A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, are a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

a. DEP Form No. 62-210.900(1)(a), dated 7/1/95
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations for each Acid Rain unit is as follows:

E.U. ID No.	EPA ID	Year	2000	2001	2002
001	01	SO2	0*	0*	0*
002	02	allowances, under Table 2 or 3 of 40 CFR Part 73	0*	0*	0*
003	03		0*	0*	0*

* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.

A.3. Comments, notes, and justifications: The permittee has requested, in a letter dated October 24, 1995, EPA exempt these units from regulation under Title IV as acid rain units. Upon written confirmation that these units are not regulated under Title IV, this section of this permit shall no longer apply. The remainder of this permit shall remain in effect.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
(version dated 02/05/97)**

Abbreviations and Acronyms:

°F: Degrees Fahrenheit
BACT: Best Available Control Technology
CFR: Code of Federal Regulations
DEP: State of Florida, Department of Environmental Protection
DARM: Division of Air Resource Management
EPA: United States Environmental Protection Agency
F.A.C.: Florida Administrative Code
F.S.: Florida Statute
ISO: International Standards Organization
LAT: Latitude
LONG: Longitude
MMBtu: million British thermal units
MW: Megawatt
ORIS: Office of Regulatory Information Systems
SOA: Specific Operating Agreement
UTM: Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
(continued)**

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD= Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U. ID

No.

Brief Description of Emissions Units and/or Activity

004 Storage of Lube Oil, Waste Oil and Diesel Fuel

005 Lube Oil Vapor Extractor, Lube Oil Air/Oil Separator, Steam Turbine Drain Flash Tank

Appendix H-1, Permit History/ID Number Changes

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date ^{1,2}	Revised Date(s)
001	42 MW Combustion Turbine	AC 53-233851B/ PSD-FL-206B	03/07/95	04/01/98		*
002	42 MW Combustion Turbine	AC 53-233851B/ PSD-FL-206B	03/07/95	04/01/98		*
003	100 MMBtu Auxiliary Boiler	AC 53-233852A/ PSD-FL-206B	03/07/95	04/01/96		

Note: Permits AC53-233851B/PSD-FL-206B and AC53-233852A/PSD-FL-206B superseded permits AC53-233851/PSD-FL-206 and AC53-233852/PSD-FL-206, respectively.

* Construction permit 1050231-002-AC extends the date that lower NOx limits are imposed on the turbines. The intent to issue that permit was issued by the Department on June 23, 1997. The requirements of that permit have been incorporated into this permit.

ID Number Changes (for tracking purposes):

From: Facility ID No.: 40TPA530231

To: Facility ID No.: 1050231

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Appendix E-1, List of Exempt Emissions Units and/or Activities

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Sandblasting at plant maintenance area
2. 165 Hp diesel engine at fire pumphouse
3. Cooling towers

**Appendix S
 Permit Summary Tables**

Table 1-1, Summary of Air Pollutant Emission Standards

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
001	Combined cycle gas turbine, Unit 1
002	Combined cycle gas turbine, Unit 2

Pollutant	Fuel(s)	Hours per Year	Allowable Emissions (Each Unit)			Equivalent Emissions ¹		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb/hour	TPY	lb/hour	TPY		
VE	Natural Gas or Biogas	8760	10% opacity, 6 minute average					BACT	A.4
NOx	"	8760	25 ppmvd at 15% oxygen, prior to January 1, 1999	37.0	161.9			BACT	A.6
NOx	"	8760	15 ppmvd at 15% oxygen, January 1, 1999 and thereafter	22.1	97.0			BACT	A.6
CO	"	8760	30 ppmvd	27.8	127.0			BACT	A.6
PM/PM ₁₀ *	"	8760		5	21.9			BACT	A.6
VOC	"	8760	10 ppmvd	3.98	17.4			BACT	A.6
SO ₂	"	8760	1 grain S per 100 cubic feet of gas			1.11	4.87	BACT	A.5

* All PM is assumed to be PM₁₀.

Appendix S
Permit Summary Tables

Table 1-1, Continued

Emissions Unit	Brief Description
003	Auxiliary boiler

Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions ¹		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb/hour	TPY	lb/hour	TPY		
VE	Natural Gas or Biogas	8760	15% opacity					BACT	B.4
NOx	"	8760	0.13 lb/mmBtu	13.0	56.9			BACT	B.6
CO	"	8760	0.10 lb/mmBtu	10.0	43.8			BACT	B.6
VOC	"	8760	0.04 lb/mmBtu	4.3	18.8			BACT	B.6
PM/PM ₁₀ *	"	8760	0.01 lb/mmBtu	1.0	4.4			BACT	B.6
SO ₂ **	"	8760	0.003 lb/mmBtu	0.30	1.3			BACT	B.5, B.6

* All PM is assumed to be PM₁₀; the PM limitation shall be considered to be met if visible emissions are not greater than 15% opacity.

** The sulfur dioxide limitation shall be considered to be met if the total sulfur content of the natural gas and biogas fuels does not exceed 1 grain per hundred cubic feet (standard conditions).

Notes:

¹ The "Equivalent Emissions" listed are for informational purposes only.

**Appendix S
Permit Summary Tables**

Table 2-1, Summary of Compliance Requirements

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
001	Combined cycle gas turbine, Unit 1
002	Combined cycle gas turbine, Unit 2

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date ¹	Minimum Compliance Test Duration	CMS ²	See Permit Condition(s)
VE	Natural Gas or Biogas	EPA Method 9	Annual	March 31	30 minutes	No	A.7, A.9
NOx	"	EPA Method 20	Annual	March 31	3 hours	Yes*	A.7, A.9, A.10
PM	"	EPA Methods 5 or 17	Prior to renewal		3 hours	No	A.8, A.9
CO	"	EPA Method 10	Prior to renewal		3 hours	No	A.8, A.9
VOC	"	EPA Methods 18 or 25A	Prior to renewal		3 hours	No	A.8, A.9
Fuel Sulfur	"	Analysis and record keeping	As fired			Yes**	A.10, A.12

* NOx and oxygen CMS required.

** Fuel consumption monitoring required.

**Appendix S
 Permit Summary Tables**

Table 2-1, Continued

Emissions Unit	Brief Description
003	Auxiliary boiler

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date ¹	Minimum Compliance Test Duration	CMS ²	See Permit Condition(s)
VE	Natural Gas or Biogas	EPA Method 9	Annual	March 31	30 minutes	No	B.7, B.9
NOx	"	EPA Method 7E	Annual	March 31	3 hours	No	B.7, B.9
PM	"	EPA Methods 5 or 17	Prior to renewal		3 hours	No	B.8, B.9
CO	"	EPA Method 10	Prior to renewal		3 hours	No	B.8, B.9
VOC	"	EPA Methods 18 or 25A	Prior to renewal		3 hours	No	B.8, B.9
Fuel Sulfur	"	Analysis and record keeping	As fired			No	B.10

Notes:

¹ Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

² CMS = continuous monitoring system

Appendix TV-1, the Title V Core Conditions, has been provided only to the applicant. The most recent version of these conditions may be obtained from the Department's Internet Web site at:

<http://www.dep.state.fl.us/air/>

If you do not have access to the Internet and would like a copy of Appendix TV, please contact Joseph Kahn, P.E., Department of Environmental Protection, Division of Air Resources Management, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, 850/488-1344.

An electronic version of this permit is also available from the Department's Internet Web site above.

Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: New Revised

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

Plant Name <i>Orange Cogeneration Facility</i>	State <i>FL</i>	ORIS Code <i>54365</i>
--	-----------------	------------------------

STEP 2
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

Compliance Plan				
a	b	c	d	e
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline
<i>01</i>	Yes	<i>No</i>	<i>6/16/95</i>	<i>1/1/96</i>
<i>02</i>	Yes	<i>No</i>	<i>6/16/95</i>	<i>1/1/96</i>
<i>03</i>	Yes	<i>No</i>	<i>6/16/95</i>	<i>1/1/96</i>
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)
Orange Cogeneration Facility

STEP 4
Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard Requirements

Permit Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)
Orange Cogeneration Facility

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

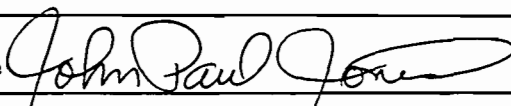
- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

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

Name	John Paul Jones	
Signature		Date 12/27/95

STEP 5 (optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS
FINDS

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.

2. The ports shall be capable of being sealed when not in use.

3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.

4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.

2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.

3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.

4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)
(continued)

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

TABLE 297.310-1
CALIBRATION SCHEDULE

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig: 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

FIGURE 1--SUMMARY REPORT--GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE (version dated 7/96)

[Note: This form is referenced in 40 CFR 60.7, Subpart A-General Provisions]

Pollutant (Circle One): SO₂ NO_x TRS H₂S CO Opacity

Reporting period dates: From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer: _____

Model No.: _____

Date of Latest CMS Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period ¹: _____

Emission data summary ¹	CMS performance summary ¹
1. Duration of excess emissions in reporting period due to: a. Startup/shutdown _____ b. Control equipment problems _____ c. Process problems _____ d. Other known causes _____ e. Unknown causes _____ 2. Total duration of excess emissions _____ 3. Total duration of excess emissions x (100) / [Total source operating time] _____ % ²	1. CMS downtime in reporting period due to: a. Monitor equipment malfunctions _____ b. Non-Monitor equipment malfunctions _____ c. Quality assurance calibration _____ d. Other known causes _____ e. Unknown causes _____ 2. Total CMS Downtime _____ 3. [Total CMS Downtime] x (100) / [Total source operating time] _____ % ²

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

Note: On a separate page, describe any changes since last quarter in CMS, process or controls.

I certify that the information contained in this report is true, accurate, and complete.

Name: _____

Signature: _____ Date: _____

Title: _____

Florida's DRAFT Permit Electronic Notification Cover Memorandum

TO: Yolanda Adams, U.S. EPA Region 4
CC: Carla E. Pierce, U.S. EPA Region 4
THRU: Scott M. Sheplak, P.E., Tallahassee Title V Section
FROM: Joseph Kahn, P.E., Permit Engineer
DATE: July 16, 1997
RE: U.S. EPA Region 4 DRAFT Title V Operation Permit Review

The following DRAFT Title V operation permits and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via. Internet E-mail, to Scott M. Sheplak, P.E., at "Sheplak_S@dep.state.fl.us".

<u>Applicant Name</u> <u>Name(s)</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File</u>
Orange Cogeneration, L.P. Orange Cogeneration Facility	Polk	INTERNET	1050231d.zip

This zipped file contains the following electronic files:

1050231i.doc
1050231d.doc
etc.

File
Florida Department of
Environmental Protection

Memorandum

TO: Bill Thomas, SWD

FROM: Joe Kahn *JK*

DATE: June 18, 1997

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Orange Cogeneration, L.P.: 1050231-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by July 11, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call me, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

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

JK/bjb

cc: Jerry Kissel

*6/18/97 Joe Kahn
Reading File*



June 6, 1997

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

RE: Additional Information
Facility ID No.: 1050231, Orange Cogeneration Facility

Dear Mr. Sheplak:

This correspondence provides some additional information and changes to the Title V air operating permit application. The following changes update the application originally submitted.

1. Facility Contact - The facility contact is now Mr. Dennis J. Oehring, Plant Manager. The revised information was included in revised pages of the Title V form under II Facility Information, Section A, Facility Contact.
2. Facility Pugitive Emissions - The Facility does not use hydrazine or hydrochloric acid. Attachment OR-FE-5 included in the facility information has been revised.
3. Emission Unit 4 Facility-wide Fugitive Emissions - Attachment OR-E04-B6 has been revised to indicate that "non-halogenated" solvents are used under the General Plant Site. The previous list included halogenated solvents, which are not used at the facility. In addition, a discussion of Trivial Activities and Notice of Temporary Exemptions has been added.

If you have any questions, please call me at (941) 682-6338.

Sincerely,

Allan Wade Smith
General Manager

cc: W. Thomas, FDEP-SWD
K. Kosky, Golder Associates
D. Oehring, CSW Energy

6/17/97 Joe Kohn

RECEIVED

JUN 16 1997

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4. Professional Engineer's 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.

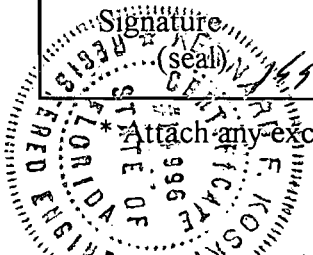
If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or 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.

Harold F. Kutz

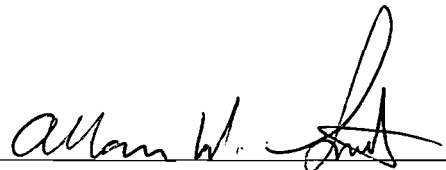
29 April 1997

Signature _____ Date



Attach any exception to certification statement.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Allan Wade Smith, General Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Orange Cogeneration, G.P., Inc. Street Address: 1125 US 98 South, Suite 100 City: Lakeland State: FL Zip Code: 33801
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (941) 682-6338 Fax: (941) 683-8257
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, 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. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained 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. 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.</i>  _____ Signature 6/6/97 _____ Date

* Attach letter of authorization if not currently on file.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 418.7 North (km): 3083.0			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 27 / 52 / 15 Longitude: (DD/MM/SS): 81 / 49 / 31			
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 (limit to 500 characters): The Orange Cogeneration Facility consists of two combustion turbines (CT) that exhaust through Heat Recovery Steam Generator (HRSG) stacks. The CTs are natural gas and biogas fired. There is an auxiliary boiler with a separate stack.			

Facility Contact

1. Name and Title of Facility Contact: Dennis J. Oehring, Plant Manager
2. Facility Contact Mailing Address: Organization/Firm: PO Box 782 Street Address: 1901 Clear Springs Road City: Bartow State: FL Zip Code: 33830
3. Facility Contact Telephone Numbers: Telephone: (941) 534-1141 Fax: (941) 533-4152

**ATTACHMENT OR-FE-5
FUGITIVE EMISSIONS IDENTIFICATION**

Many fugitive emissions at the plant site have been classified as "trivial activities" (as presented in EPA's memorandum, "White Paper for Streamlined Development of Part 70 Permit Applications," July 10, 1995). As a result, these activities are not included as part of this permit application. For example, emissions from general plant maintenance and upkeep activities at the facility would be considered fugitive emissions, but have been judged to be trivial since these activities are not conducted as part of a manufacturing process, not related to the source's primary business activity, and do not otherwise trigger a permit modification.

Fugitive emissions that may result from the operation or activities that are not trivial at the facility are addressed in Emission Unit No. 4. This emission unit contains information on fugitive emissions that occur on a facility-wide basis. A summary of potential fugitive emission sources at the facility is presented in the following sections.

Criteria and Precursor Air Pollutants

Orange Cogeneration has not identified fugitive emission of sulfur dioxide, nitrogen oxides, carbon monoxide, or lead compounds which would exceed the thresholds defined in the permit application instructions.

Volatile Organic Compounds (VOCs)

Fugitive emissions of VOCs include those resulting from the use of cleaners and solvents for maintenance and operation.

Fugitive HAPs Emissions

The following hazardous air pollutants are present on the facility property and are potential sources of fugitive HAPs emissions:

- chlorine
- methyl ethyl ketone
- toluene
- xylene

Chlorine - Present in three 1-ton containers. Used for water treatment at the facility.

Methyl Ethyl Ketone, Toluene, Xylene - The facility maintains several containers of paint thinner and solvents (which may contain MEK, toluene, or xylene) for use in plant maintenance activities. These containers are kept closed and are stored in weather-tight buildings. These emissions as a whole are addressed in the VOC section (preceding page).

Regulated Toxic or Flammable Substances

The following regulated toxic or flammable substances are present at the Orange Cogeneration facility:

- chlorine
- acetylene
- methane (natural gas)

Acetylene - Present on the facility property in 100-lb cylinders which are used for plant maintenance (welding and cutting).

Methane - Is a primary component of natural gas. The facility has a natural gas pipeline which delivers fuel to the generating units. This fuel delivery system is normally airtight, but does have safety valves which may open if an overpressure condition develops in the gas line.

ATTACHMENT OR-E04-B6
EMISSIONS UNIT COMMENT

TRIVIAL ACTIVITIES

The trivial activities identified in this application are provided for information only and are identified as examples of, but not limited to, the trivial activities identified by the Division of Air Resources Management's (DARM's) guidance. It is understood that such activities do not have to be included in with the Title V Application. The trivial activities identified herein are consistent, in terms of amounts of emissions and types, with those activities listed in DARM's guidance.

NOTIFICATION OF TEMPORARY EXEMPTIONS

Pursuant to Rule 62-210.300(3)(b)1., notice is herein provide that the emissions units listed below are not subject to a permit issued by the Department of Environmental Protection and are exempt from permitting until a final determination is made under the Title V permitting requirements (Rule 62-213 F.A.C.). These units would not have triggered review under Rules 62-212.400 or 62-212.500 or any new source performance standard listed in Rule 62-204.800 F.A.C.

Attachment OR-E04-B6
General Emissions Unit Information for Unregulated Emissions Unit

Table 1. Unregulated Emission Unit, Orange Cogeneration Limited Partnership, Orange Cogeneration Facility

Area	Activity/ Operation Description	Status
<u>Plant Service Building</u>		
Plant Maint. Shop Area	Indoor Fugitives (grinder, drill presses, etc.)	TR
	Sand Blasting/ Grit Blasting	ER/TR
	Flamible Storage Locker (chemicals, solvents, and oils)	TR
Soda Ash Room	Soda Ash (dry powder injection)	TR
Cooling Towers	Primary Water Cooling Tower	UR
	Secondary Water Cooling Tower	UR
	Waste Water Cooling Tower	UR
<u>Water Treatment</u>		
	Sulfuric Acid Tank (6,000 gal)	TR
	Calandria Anti-Foam Tank (400 gal)	TR
	Caustic Soda Tank (6,000 gal)	TR
	Chlorine Storage (3 - 1 ton cylinders)	TR
	Raw Water Chlorine Tank	TR
	<u>Cooling Tower Chemicals</u>	TR
	Dispersant Tank (400 gal)	
	Corrosion Inhib. Tank (400 gal)	
	Sodium Bromide Tank (400 gal)	
	<u>Chemical Storage Area</u>	TR
	RO Antiscalant- 50 gal	
	Clarifier Coagulant - 400 gal	
	Clarifier Flocculant - 100 gal	
	Chlorine Oxygen Scavenger - 75 gal	
<u>Gas Compressor Building</u>		
	New Lube Oil Storage (drums)	UR

Attachment OR-E04-B6
General Emissions Unit Information for Unregulated Emissions Unit

Table 1. Unregulated Emission Unit, Orange Cogeneration Limited Partnership, Orange Cogeneration Facility

Area	Activity/ Operation Description	Status
<u>Outside Gas Compressor Building</u>		
	Waste Oil Storage (1 - 200 gal tank)	UR
<u>Fire Pumphouse</u>		
	165 Hp Detroit Diesel Engine	ER/TR
	Diesel fuel tank (250 gal or less)	UR
<u>CT/HRSG & Steam Turbine</u>		
	CTs Lube Oil Vapor Extractor (Mist Elimination System)	UR
	Lube Oil Air/Oil Separator	UR
	STG Drain Flash Tank	UR
	Various Pumps (sumps, condensate, etc.)	TR
	Miscellaneous Drains Tank	TR
	CT Lube Oil Drain Tank (2 - 50 gal)	TR
	STG Lube Oil Tank Storage Tank (500 gal)	UR
	CT Lube Oil Tank Storage Tank (2 - 150 gal)	UR
	Condenser Pumps (3)	TR
	Condenser Vents (3)	TR
	Gland Seal Exhauster	TR
	<u>HRSG Boiler Chemical Injection</u>	TR
	Amine Tank (400 gal)	
	Phosphate Tank (400 gal)	
	Oxygen Scavenger (400 gal)	
<u>Auxillary Boiler</u>		
	<u>Boiler Chemical Injection</u>	TR
	Amine Tank (75 gal)	
	Phosphate Tank (75 gal)	
	Oxygen Scavenger (75 gal)	

Attachment OR-E04-B6
General Emissions Unit Information for Unregulated Emissions Unit

Table 1. Unregulated Emission Unit, Orange Cogeneration Limited Partnership, Orange Cogeneration Facility

Area	Activity/ Operation Description	Status
<u>General Plant Site</u>	Non-Halogenated Solvent Cleaners/Degreasers	TR
	Sewage Waste System	UR
	Substation Transformers and Associated Equipment (4 transformers)	TR

Note: ER= Exempt by Rule 62-210.300(3)(a); TR= Trivial; UR= Unregulated.



September 10, 1997

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

Re: DRAFT Title V Permit No.: 1050231-001-AV
Orange Cogeneration Facility

Dear Mr. Sheplak:

I am writing to provide comments on the Draft Title V Air Operation Permit for the Orange Cogeneration Facility. I recently received a copy of a letter dated September 3, 1997, from Mr. Joseph Kahn, P.E. from your office to Mr. David McNeal of the EPA regarding a custom fuel monitoring plan for the Orange Cogeneration Facility. We request that such a plan be included in Section III, Subsections A.12 and B.10 of the Title V Air Operation Permit. In addition, we request the following modifications to the Draft Title V Air Operation Permit:

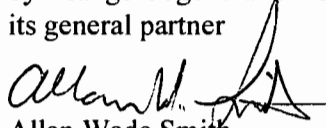
1. The correct address for the facility is: 1901 Clear Springs ~~Mine~~ Road, Bartow, FL 33830. The address for the Permittee in the Draft permit is 1901 Clear Springs Road, Bartow, FL 33830.
2. There is a typo in the third paragraph of Section I, Subsection A. It should read "..., this facility **is** not a major source ..."
3. I would like to clarify something in Section III, Subsection A. in the first chart where the emissions units are described. Typically the steam produced by the HRSGs is delivered to the steam turbine. Steam is then extracted from the steam turbine and delivered to the juice processing facility. Technically the HRSGs supply the steam, so I do not know that a wording change is necessary, but I wanted to ensure that you understand how the process typically works.
4. The second sentence of Section III, Subsection A.9 defines the permitted capacity as "95 - 100 percent of the maximum heat input rate allowed by this permit, achievable for the average ambient air temperature during the test." Both of the combustion turbines at the Orange Cogeneration Facility have inlet air conditioning capability which allows the operators to control, to some degree, the inlet air temperature to the combustion turbines. Should the word ambient be stricken from the definition?
5. The requirement to maintain records of the sulfur content of the biogas fuel referenced in Section III, Subsections A.12 and B.10 should be contingent upon biogas fuel becoming available.

Mr. Scott Sheplak
September 10, 1997
Page Two

6. the first chart in Section III, Subsection B where the emissions unit is described should read as: "..., with a maximum heat input of 100 mmBtu/hr ..."

I hope these comments help in the preparation of the Final Title V Air Operation Permit for the Orange Cogeneration Facility. Please contact me at 941-682-6338 with any questions regarding these comments.

Sincerely,
Orange Cogeneration Limited Partnership
by Orange Cogeneration GP, Inc.
its general partner


Allan Wade Smith
General Manager

cc: Dennis Oehring - CSWE Orange Cogeneration Facility