



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

Certified Mail – Return Receipt Requested

October 7, 2005

Mr. David Kellermeyer  
Vice President, EH&S  
Northern Star Generation  
2929 Allen Parkway  
Suite 2200  
Houston, TX 77019

Re: Title V Air Operation Permit Revision Application, and  
Application for a Minor Modification (amendment to air construction  
permit PSD-FL-206)  
**Orange Cogeneration Facility**  
**Projects 1050231-008-AC and 1050231-009-AV**

Dear Mr. Kellermeyer:

Thank you for your recent submission of a Title V Air Operation Permit Revision Application, and Application for a Minor Modification (amendment to permit PSD-FL-206) for the referenced plant. However, we must deem your applications *incomplete*, due to the omission of engineering computations evaluating the possible increase in annual potential emissions for nitrogen oxides (NO<sub>x</sub>) reflecting the requests for 1) incorporation of alternate startup and shutdown emissions limits utilizing a 4-hour rolling average, 2) revisions to the NO<sub>x</sub> emission limit averaging time, 3) definition of excess emissions, and 4) recognition of the operational state of "combustor tuning session" for the emission units and the corresponding definition of allowed excess emissions. Your response should include historical data where appropriate, and address potential pollutant emissions increases in detail due to each of the requested changes to the facility's permits.

When we receive this information we will continue processing your applications. If you have any questions, please contact Project Engineer Tom Cascio at 850/921-9526.

Sincerely,

A. A. Linero, P.E.  
Program Administrator  
Permitting South Section

cc: Scott Osbourn, P.E., Golder Associates, Inc.

"More Protection, Less Process"

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