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September 30, 2010

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AIR REGULATION

RE: Draft Title V and PSD/Construction Permit Comments
Auburndale Peaker Energy Center/Osprey Energy Center
DEP File No.: 1050334

Calpine Operating Services Company, Inc. (COSCI) thanks you for your assistance with the Auburndale Peaker Energy Center and Osprey Energy Center Title V Permit split and PSD/Construction Permit modification project. COSCI has reviewed the draft permits and provides the following comments:

Air Construction Permit Modifications (1050221-004-AC and PSD-FL287)

- *Section I (Existing Facility):* COSCI is the operator of both facilities. However, The Auburndale Peaker Energy Center is owned by Auburndale Peaker Energy Center, LLC, and the Osprey Energy Center is owned by Calpine Construction Finance Company, L.P. Therefore, COSCI suggests the following language:

“Calpine Operating Services Company, Inc. operates two existing power plants that are composed of the Auburndale Peaker Energy Center and the Osprey Energy Center. The Auburndale Peaker Energy Center is owned by Auburndale Peaker Energy Center, LLC, and the Osprey Energy Center is owned by Calpine Construction Finance Company, L.P.”

Title V Air Operation Permit (1050334-008-AV)

- *Cover Page and Placard:* There are two separate owners for this permit, which jointly hold the PSD and Title V permits: Auburndale Peaker Energy Center, LLC (owner of Auburndale Peaker Energy Center), and Calpine Construction Finance Company, L.P. (owner of Osprey Energy Center). COSCI requests both owners

be listed on the permit in lieu of Calpine Corporation as joint permittees. The address provided is appropriate.

- *Page 2 Section I(A)*: COSCI is the operator of both facilities. However, The Auburndale Peaker Energy Center is owned by Auburndale Peaker Energy Center, LLC, and the Osprey Energy Center is owned by Calpine Construction Finance Company, L.P. Therefore, COSCI suggests the following language:

“Calpine Operating Services Company, Inc. operates two existing power plants that are composed of the Auburndale Peaker Energy Center and the Osprey Energy Center. The Auburndale Peaker Energy Center is owned by Auburndale Peaker Energy Center, LLC, and the Osprey Energy Center is owned by Calpine Construction Finance Company, L.P.”

- *Page 4 Section II (FW7)*: The Fees Department discourages but allows for Fees to be submitted via methods other than the US Postal Service. COSCI requests the following language:

“Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked or otherwise documented) by March 1 of each year. The forms are available for download by...”

- *Page 6 Section III (Unit Description)*: COSCI identified a slight error in the permit application regarding the Auburndale Peaker Energy Center (EU006). The permit application (Page 17) indicates a stack diameter of 22.0 feet. However, the stack is a rectangular stack measuring 33.5 feet by 12 feet equating to an equivalent diameter of 22.6 feet. The stack height, volumetric flow rate and exit temperature have been confirmed to be correct. Therefore, the error does not affect any previous modeling for the facility, and COSCI requests the permit be modified to read:

“Stack height is 50 feet, stack exit dimensions are 33.5 feet by 12 feet (resulting in an equivalent diameter of 22.6 feet), volumetric flow rate...”

- *Page 9 Section III(A.13.a)*: FDEP has historically approved the use of EPA Test Method 3A of 40 CFR 60 Appendix A (Determination of Oxygen and Carbon Dioxide Concentrations in Emissions From Stationary Sources (Instrumental Analyzer Procedure)) in lieu of EPA Test Method 3B of 40 CFR 60 Appendix A (Gas analysis for the determination of emission rate correction factor or excess air). 40 CFR 75 Appendix A (6.5.10) requires the use of EPA Method 3, 3A or 3B of 40 CFR 60 Appendix A to determine O₂ or CO₂. Therefore, COSCI requests this requirement be updated to allow the facility to use any of EPA Methods 3, 3A or 3B of 40 CFR 60 Appendix A.

- *Page 12 Section III(A.20):* The current Title V requires the noted information be kept onsite available for review by the 5th day of the month and submit the data annually as part of the AOR. However, the facility has never been required to submit this data to the Compliance Authority monthly. COSCI requests this reporting requirement be revised to monthly onsite recordkeeping and annual submittal. In the event FDEP requires the data be submitted to the Compliance Authority monthly, COSCI requests a submittal date of 30th day of the following month.

COSCI also requests the reporting requirements of A.10 and A.13a/b be added to this table. For Example:

Report	Recordkeeping Deadline	Related Condition(s)
Monthly Operations Summary	Monthly Onsite Recordkeeping Annual Submittal (April 1)	A.22 and A.23.
CEMS Reports	Semi-Annually (July 30 and January 30)	A.13a and A.13b
Notice of Excess Emissions	As Required	A.10

- *Page 15 Section III(B.15):* FDEP has historically approved the use of EPA Test Method 3A of 40 CFR 60 Appendix A (Determination of Oxygen and Carbon Dioxide Concentrations in Emissions From Stationary Sources (Instrumental Analyzer Procedure)) in lieu of EPA Test Method 3B of 40 CFR 60 Appendix A (Gas analysis for the determination of emission rate correction factor or excess air). 40 CFR 75 Appendix A (6.5.10) requires the use of EPA Method 3, 3A or 3B of 40 CFR 60 Appendix A to determine O₂ or CO₂. Therefore, COSCI requests this requirement be updated to allow the facility to use any of EPA Methods 3, 3A or 3B of 40 CFR 60 Appendix A.
- *Page 17 Section III(B.16):* EPA has redesignated EPA Method 206 as CTM-027. COSCI requests EPA Method 206 be listed as 206/CTM-027.
- *Page 18 Section III(B.24):* COSCI requests the due dates be added to the table. For Example:

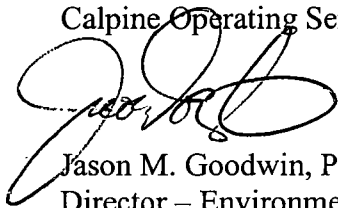
Report	Reporting Deadline	Related Condition(s)
CEMS Reports	Semi-Annually (July 30 and January 30)	B.26
Notice of Excess Emissions	As Required	B.27

- *Page 19 Section III (B.27):* Units EU007-EU010 are not equipped with water or steam injection. Therefore, a water-to-fuel ratio is not meaningful for these units, and COSCI requests the last sentence be edited to delete the words "...in lieu of water-to-fuel ratio data" from the condition.
- *Appendix I Page I-2 of 1* (number of pages should be updated to 2): This section references Auburndale Power Plant's equipment. COSCI requests FDEP update this information to Osprey Energy Center and Auburndale Peaker Energy Center information. The Osprey Energy Center has a 1,250 kW emergency generator. COSCI also notes several references in the Appendices to "Calpine Corporation," and we request that these be revised to "COSCI".
- *NESHAP and NSPS Appendices:* COSCI requests the following note be added to these Appendices..."The information contained in this Appendix is for reference only. Facilities should reference the effective rule for ongoing compliance." Or move to the "Included for convenience" section of the Appendices.

COSCI again thanks the Department for their assistance on this project. If you have any questions or concerns, please contact Heidi M. Whidden at (713) 570-4829 or hwhidden@calpine.com.

Sincerely,

Calpine Operating Services Company, Inc.



Jason M. Goodwin, P.E.
Director – Environmental, Health & Safety
Southeast Region Operations
Responsible Official—Permitting

C: Tom Cascio, FDEP (email)
Heidi M. Whidden; Calpine (email)
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Andrew Martin; Calpine (email)
File: OS/Air/Applications & Correspondence/Draft Permit Comments 093010