



CALPINE

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July 18, 2005

Federal Express Number: 7916 7883 3685

Mr. Michael Halpin
Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
(850) 488-1344

RECEIVED

JUL 19 2005

BUREAU OF AIR REGULATION

Re: **Permit Modification—Requirement for Annual Compliance Test Completion**
Santa Rosa Energy Center
Permit Number: 1130168-004-AV

1130168-004-AV

Dear Mr. Halpin:

As you are aware, the Santa Rosa Energy Center (Facility) Title V Permit requires the facility to complete annual compliance testing. These testing requirements are included in Section III, Conditions A.19, A.22, and A.30 of the permit. The facility has completed and passed the required testing every year since commencement of operation in 2002.

Based on our recent conversation, it is the Facility's understanding that the agency would consider extending the 400-hour compliance test exemption for liquid and/or solid fuels to include all fuels, including natural gas. The facility requests the subject Title V permit and, if the agency deems it necessary, the PSD permit be modified to include the following exemption:

In the event the facility does not burn natural gas for greater than 400-hours during the fiscal year (October 1-September 30), the Department shall not require completion of annual compliance tests.

The Facility requests this or similar language be added to Section III, Condition A.30(a) of the Title V permit.

The Facility also notes that the NOx CEMS will continue to meet Quality Assurance requirements per 40 CFR Part 75 specifications.

If you have any further questions or concerns, please contact me at (813) 637-7316 or hwhidden@calpine.com.

Sincerely,

CALPINE CORPORATION

Heidi M. Whidden
Environmental Specialist

Cc: Mr. Andy Allen, FDEP Northwest District; Federal Express No.: 7911 3936 2860
Mr. Ronald Rose, Santa Rosa Energy Center