Derenzo and Associates, Inc.
Environmental Consultants

November 22, 2010

Ms. Trina Vielhauer, Bureau Chief
Bureau of Air Regulation
Department of Environmental Protection
STATE OF FLORIDA
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Subject: Seminole Energy, LLC
DEP File No. 1170084-008-AC (PSD-FL-376A)
LFG Monitoring Sulfur and Chlorine Contents

Dear Ms. Vielhauer:

Condition 3.C. of Section III – Emission Unit(s) Specific Conditions of Air Construction Permit 1170084-008-AC (PSD-FL-376A) issued Seminole Energy, LLC (Seminole Energy) specifies that *The permittee shall comply with the following requirements to monitor the sulfur and chlorine content of the landfill gas:*

... the permittee shall sample and analyze the landfill gas for sulfur and chlorine content. The gas sample collected for the analyses shall be a composite sample and collected under normal operating conditions ... The gas sample collection and analyses for sulfur and chlorine content shall be done semi-annually ... Results shall be reported as SO_2 and HCl emission factors in terms of lb/MMscf of landfill gas.

The initial gas sample collection and analyses were completed in February 2007. Therefore, Derenzo and Associates, Inc. (Derenzo and Associates), on behalf of Seminole Energy, is submitting to the Florida Department of Environmental Protection, Division of Air Resource Management (FDEP-DARM) results of sulfur and chlorine analyses that were performed on a sample of landfill gas (LFG) obtained from the Osceola Road Solid Waste Management Facility in November 2010 (semi-annual collection and analyses). The required SO_2 and HCl emission factors (in terms of lb/MMscf of landfill gas) and supporting analytical data are provided in the attached documents.

The air permit application for Seminole Energy developed (based on USEPA AP-42 default LFG composition data) a:

1. SO_2 emission factor of 27.5 lb/MMscf of LFG; and

2. HCl emission factor of 11.95 lb/MMscf of LFG.

Permit File Scanning Request from _____

Priority: ☐-ASAP (Public Records Request, etc.) ☒-Place in Normal Scanning Queue

Facility ID	Project#/PATS#	Type	PSD #	Submittal Date	Batch #
1170084	008	AC	376A		

☒ File Approved For Disposal ☐ Correspondence ☐ Intent ☐ Permit ☐ Draft (Title V)

☐ Return File to BAR ☐ Amendment ☐ Application ☐ OGC ☐ Proposed (Title V)

Document Date 11-29-10

The SO_2 emission factor developed from analyses of the November 8, 2010 sample of LFG obtained from the Osceola Road Solid Waste Management Facility is 14.53 lb/MMscf of LFG (<18.62 lb/MMscf of LFG with the incorporation of all non-measured chemicals at its reporting limit).

The HCl emission factor developed from analyses of the November 8, 2010 sample of LFG obtained from the Osceola Road Solid Waste Management Facility is 0.47 lb/MMscf of LFG (<0.69 lb/MMscf of LFG with the incorporation of all non-measured chemicals at its reporting limit).

Please contact us if you have questions or require clarifications

Sincerely,

DERENZO AND ASSOCIATES, INC.

Charles Scamp
Environmental consultant

attachments
c: Mike Laframboise, Landfill Energy Systems
Gary Kuberski, FDEP Central District Office
Kimberly Russell, Seminole County Solid Waste Management Division

Seminole Energy, LLC (November 8, 2010 Sample)

Sulfur Dioxide Emission Factor for LFG Combustion

LFG Influent Sulfur Compound	Analytical Report Concentrations[A] (ppmv)	Molecular Formula	No. Sulfur Atoms	Sulfur Content[B] as H_2S (ppmv)	Resulting SO_2 Emission Rate (lb./MMcf)
Hydrogen sulfide	69.0	H_2S	1	69.0	11.47 *
Carbonyl sulfide	<1.20	CSO	1	<1.20	<0.20
Methyl mercaptan	8.40	CH_4S	1	8.40	1.40
Ethyl mercaptan	<1.20	C_2H_6S	1	<1.20	<0.20
Dimethyl sulfide	10.0	C_2H_6S	1	10.0	1.66
Carbon disulfide	<1.50	CS_2	2	<3.00	<0.50
Isopropyl mercaptan	<1.20	C_3H_6S	1	<1.20	<0.20
tert-Butyl mercaptan	<1.20	$C_4H_{10}S$	1	<1.20	<0.20
n-Propyl mercaptan	<1.20	C_3H_8S	1	<1.20	<0.20
Ethyl methyl sulfide	<1.20	C_3H_8S	1	<1.20	<0.20
Thiophene	<1.20	C_4H_4S	1	<1.20	<0.20
Isobutyl mercaptan	<1.20	$C_4H_{10}S$	1	<1.20	<0.20
Diethyl sulfide	<1.20	$CH_3CH_2SCH_2CH_3$	1	<1.20	<0.20
n-Butyl mercaptan	<1.20	$C_4H_{10}S$	1	<1.20	<0.20
3-Methyl Thiophene	<1.20	C_5H_6S	1	<1.20	<0.20
Dimethyl disulfide	<1.20	CH_3SSCH_3	2	<2.40	<0.40
Tetrahydrothiophene	<1.20	$C_4H_8O_2S$	1	<1.20	<0.20
2-Ethylthiophene	<1.20	C_6H_8S	1	<1.20	<0.20
2,5-Dimethylthiopene	<1.20	C_6H_8S	1	<1.20	<0.20
Diethyl disulfide	<1.20	CH_3SSCH_3	2	<2.40	<0.40
Total				**<112.0**	**<18.62** [C]

Notes

A. November 9, 2010 LFG sample laboratory analytical results (see Attachment)

B. Determined by multiplying concentration by number of sulfur atoms in the molecule.

C. Calculation of SO_2 emission factor from sulfur content, as H_2S:

(112.0 scf H_2S/MMcf LFG) (1 scf SO_2/scf H_2S) (64.06 lb.SO_2/mol) / (385.3 ft^3/mol)
= 18.6 lb SO_2/MMcf LFG

* Sample calculation: SO_2 generation from hydrogen sulfide (H_2S):

(69.0 scf H_2S/MMcf LFG) (1 scf SO_2/scf H_2S) (64.06 lb.SO_2/mol) / (385.3 ft^3/mol)
= 11.47 lb SO_2/MMcf LFG

Seminole Energy, LLC (November 8, 2010 Sample)

Sulfur Dioxide Emission Factor for LFG Combustion

LFG Influent Sulfur Compound	Measured Concentrations[A] (ppmv)	Molecular Formula	No. Sulfur Atoms	Sulfur Content[B] as H_2S (ppmv)	Resulting SO_2 Emission Rate (lb./MMcf)
Hydrogen sulfide	69.0	H_2S	1	69.0	11.47 *
Methyl mercaptan	8.40	CH_4S	1	8.40	1.40
Dimethyl sulfide	10.0	C_2H_6S	1	10.0	1.66
Total				**87.4**	**14.53**

Notes

A. November 9, 2010 LFG sample laboratory analytical results (see Attachment)

B. Determined by multiplying concentration by number of sulfur atoms in the molecule.

* Sample calculation: SO_2 generation from hydrogen sulfide (H_2S):

(69.0 scf H_2S/MMcf LFG) (1 scf SO_2/scf H_2S) (64.06 lb.SO_2/mol) / (385.3 ft^3/mol)

= 11.47 lb SO_2/MMcf LFG

Seminole Energy, LLC (November 8, 2010 Sample)

LFG Combustion Hydrogen Chloride Emission Factor

LFG Influent Chlorine Coumpounds	Analytical Report Concentration[1] (ppm)	Molecular Formula	No. Chlorine Atoms	HCl Emission Factor (lb./MMcf)
Freon 12 (Dichlorodifluoromethane)	0.460	CCl_2F_2	2	0.087 *
Freon 114 (Dichlorotetrafluroethane)	<0.025	$C_2Cl_2F_4$	2	<0.005
Chloromethane	<0.100	CH_3Cl	1	<0.009
Vinyl Chloride	<0.025	C_2HCl	1	<0.002
Chloroethane	<0.025	C_2H_5Cl	1	<0.002
Freon 11 (Fluorotrichloromethane)	<0.025	$CFCl_3$	3	<0.007
Freon 113 (1,1,2-trichloro-1,2,2-trifluoroethane)	<0.025	$C_2Cl_2F_3$	2	<0.005
3-Chloropropene	<0.100	C_3H_5Cl	1	<0.009
Methylene Chloride (Dichloromethane)	<0.025	CH_2Cl_2	2	<0.005
1,2-Dichloroethene (as cis-1,2-Dichloroethene)	0.320	$C_2H_2Cl_2$	2	0.060
1,2-Dichloroethene (as trans-1,2-Dichloroethene)	<0.025	$C_2H_2Cl_2$	2	<0.005
1,1-Dichloroethane	<0.025	$C_2H_4Cl_2$	2	<0.005
1,1-Dichloroethene	<0.025	$C_2H_2Cl_2$	2	<0.005
Chloroform	<0.025	$CHCl_3$	3	<0.007
1,1,1-Trichloroethane	<0.025	$C_2H_3Cl_3$	3	<0.007
Carbon Tetrachloride	<0.025	CCl_4	4	<0.009
1,2-Dichloroethane	0.250	$C_2H_4Cl_2$	2	0.047
Trichloroethene	<0.025	C_2HCl_3	3	<0.007
1,2-dichloropropane	<0.025	$C_3H_6Cl_2$	2	<0.005
Bromodichloromethane	<0.025	$CBrCl_2$	2	<0.005
1,3-Dichloropropene (as cis-1,3-Dichloropropene)	<0.025	$C_3H_4Cl_2$	2	<0.005
1,3-Dichloropropene (as trans-1,3-Dichloropropene)	<0.025	$C_3H_4Cl_2$	2	<0.005
1,1,2-Trichloroethane	<0.025	$C_2H_3Cl_3$	3	<0.007
Tetrachloroethene (Perchloroethene)	0.410	C_2Cl_4	4	0.155
Dibromochloromethane	<0.025	$CHBr_2Cl$	1	<0.002
Chlorobenzene	0.350	C_6H_5Cl	1	0.033
1,1,2,2-Tetrachloroethane	<0.025	$C_2H_2Cl_4$	4	<0.009
1,3-Dichlorobenzene	<0.025	$C_6H_4Cl_2$	2	<0.005
1,4-Dichlorobenzene	0.460	$C_6H_4Cl_2$	2	0.087
alpha-Chlorotoluene	<0.025	C_7H_7Cl	1	<0.002
1,2-Dichlorobenzene	<0.025	$C_6H_4Cl_2$	2	<0.005
1,2,4-Trichlorobenzene	<0.100	$C_6H_3Cl_3$	3	<0.028
Hexachlorobutadiene	<0.100	C_4Cl_6	6	<0.057
Total hydrogen chloride emission factor (lb./MMcf)				**<0.69**

Notes

1. November 9, 2010 LFG sample laboratory analytical results (see Attachment)

* Example calculation for Freon 12 that assumes complete conversion of chloride to HCl

(0.46 ft^3 Freon 12/MMcf LFG) (2 mol HCl/mol Freon 12) (36.46 lb. HCl/mol) / (387 ft^3/mol)

= 0.087 lb. HCl/MMcf LFG

Seminole Energy, LLC (November 8, 2010 Sample)

LFG Combustion Hydrogen Chloride Emission Factor

LFG Influent Chlorine Compounds[1]	Measured Concentration (ppm)	Molecular Formula	No. Chlorine Atoms	HCl Emission Factor (lb./MMcf)
Freon 12 (Dichlorodifluoromethane)	0.460	CCl_2F_2	2	0.087 *
1,2-Dichloroethene (as cis-1,2-Dichloroethene)	0.320	$C_2H_2Cl_2$	2	0.060
1,2-Dichloroethane	0.250	$C_2H_4Cl_2$	2	0.047
Tetrachloroethene (Perchloroethene)	0.410	C_2Cl_4	4	0.155
Chlorobenzene	0.350	C_6H_5Cl	1	0.033
1,4-Dichlorobenzene	0.460	$C_6H_4Cl_2$	2	0.087
Total hydrogen chloride emission factor (lb./MMcf)				**0.47**

Notes

1. November 9, 2010 LFG sample laboratory analytical results (see Attachment)

* Example calculation for Freon 12 that assumes complete conversion of chloride to HCl
(0.46 ft^3 Freon 12/MMcf LFG) (2 mol HCl/mol Freon 12) (36.46 lb. HCl/mol) / (387 ft^3/mol) = 0.087 lb. HCl/MMcf LFG

LABORATORY NARRATIVE
EPA Method TO-15
Derenzo & Associates
Workorder# 1011192A

Two 1 Liter Tedlar Bag samples were received on November 09, 2010. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the full scan mode.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Receiving Notes

The Chain of Custody (COC) was not relinquished properly. A signature and date were not provided by the field sampler.

Sample collection date was not provided on the Chain of Custody for samples. The client was contacted and a date of 11/8/10 was provided.

Sample SE2 was placed on hold per the client's request.

Analytical Notes

Method TO-15 is validated for samples collected in specially treated canisters. As such, the use of Tedlar bags for sample collection is outside the scope of the method and not recommended for ambient or indoor air samples. It is the responsibility of the data user to determine the usability of TO-15 results generated from Tedlar bags.

Dilution was performed on sample SE1 due to the presence of high level target species.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).
J - Estimated value.
E - Exceeds instrument calibration range.
S - Saturated peak.
Q - Exceeds quality control limits.
U - Compound analyzed for but not detected above the reporting limit.
UJ- Non-detected compound associated with low bias in the CCV
N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:
a-File was requantified

b-File was quantified by a second column and detector
r1-File was requantified for the purpose of reissue

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Laboratory Services Since 1989

Summary of Detected Compounds
MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Client Sample ID: SE1

Lab ID#: 1011192A-01A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Freon 12	25	460	120	2300
Ethanol	100	150000	190	280000
Acetone	100	28000	240	67000
2-Propanol	100	18000	240	45000
Hexane	25	630	88	2200
2-Butanone (Methyl Ethyl Ketone)	25	30000	74	88000
cis-1,2-Dichloroethene	25	320	99	1300
Tetrahydrofuran	25	4200	74	12000
Cyclohexane	25	450	86	1500
Benzene	25	5100	80	16000
1,2-Dichloroethane	25	250	100	1000
Heptane	25	970	100	4000
4-Methyl-2-pentanone	25	1800	100	7300
Toluene	25	14000	94	52000
Tetrachloroethene	25	410	170	2800
Chlorobenzene	25	350	120	1600
Ethyl Benzene	25	6200	110	27000
m,p-Xylene	25	10000	110	45000
o-Xylene	25	3200	110	14000
Styrene	25	870	110	3700
Propylbenzene	25	490	120	2400
4-Ethyltoluene	25	1900	120	9600
1,3,5-Trimethylbenzene	25	740	120	3600
1,2,4-Trimethylbenzene	25	1900	120	9500
1,4-Dichlorobenzene	25	460	150	2800

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Client Sample ID: SE1

Lab ID#: 1011192A-01A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	w110922	**Date of Collection:**	11/8/10 2:00:00 PM
Dil. Factor:	50.0	**Date of Analysis:**	11/9/10 10:17 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Freon 12	25	460	120	2300
Freon 114	25	Not Detected	170	Not Detected
Chloromethane	100	Not Detected	210	Not Detected
Vinyl Chloride	25	Not Detected	64	Not Detected
1,3-Butadiene	25	Not Detected	55	Not Detected
Bromomethane	25	Not Detected	97	Not Detected
Chloroethane	25	Not Detected	66	Not Detected
Freon 11	25	Not Detected	140	Not Detected
Ethanol	100	150000	190	280000
Freon 113	25	Not Detected	190	Not Detected
1,1-Dichloroethene	25	Not Detected	99	Not Detected
Acetone	100	28000	240	67000
2-Propanol	100	18000	240	45000
Carbon Disulfide	25	Not Detected	78	Not Detected
3-Chloropropene	100	Not Detected	310	Not Detected
Methylene Chloride	25	Not Detected	87	Not Detected
Methyl tert-butyl ether	25	Not Detected	90	Not Detected
trans-1,2-Dichloroethene	25	Not Detected	99	Not Detected
Hexane	25	630	88	2200
1,1-Dichloroethane	25	Not Detected	100	Not Detected
2-Butanone (Methyl Ethyl Ketone)	25	30000	74	88000
cis-1,2-Dichloroethene	25	320	99	1300
Tetrahydrofuran	25	4200	74	12000
Chloroform	25	Not Detected	120	Not Detected
1,1,1-Trichloroethane	25	Not Detected	140	Not Detected
Cyclohexane	25	450	86	1500
Carbon Tetrachloride	25	Not Detected	160	Not Detected
2,2,4-Trimethylpentane	25	Not Detected	120	Not Detected
Benzene	25	5100	80	16000
1,2-Dichloroethane	25	250	100	1000
Heptane	25	970	100	4000
Trichloroethene	25	Not Detected	130	Not Detected
1,2-Dichloropropane	25	Not Detected	120	Not Detected
1,4-Dioxane	100	Not Detected	360	Not Detected
Bromodichloromethane	25	Not Detected	170	Not Detected
cis-1,3-Dichloropropene	25	Not Detected	110	Not Detected
4-Methyl-2-pentanone	25	1800	100	7300
Toluene	25	14000	94	52000
trans-1,3-Dichloropropene	25	Not Detected	110	Not Detected
1,1,2-Trichloroethane	25	Not Detected	140	Not Detected
Tetrachloroethene	25	410	170	2800

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Client Sample ID: SE1

Lab ID#: 1011192A-01A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**w110922**	**Date of Collection: 11/8/10 2:00:00 PM**	
Dil. Factor:	**50.0**	**Date of Analysis: 11/9/10 10:17 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Hexanone	100	Not Detected	410	Not Detected
Dibromochloromethane	25	Not Detected	210	Not Detected
1,2-Dibromoethane (EDB)	25	Not Detected	190	Not Detected
Chlorobenzene	25	350	120	1600
Ethyl Benzene	25	6200	110	27000
m,p-Xylene	25	10000	110	45000
o-Xylene	25	3200	110	14000
Styrene	25	870	110	3700
Bromoform	25	Not Detected	260	Not Detected
Cumene	25	Not Detected	120	Not Detected
1,1,2,2-Tetrachloroethane	25	Not Detected	170	Not Detected
Propylbenzene	25	490	120	2400
4-Ethyltoluene	25	1900	120	9600
1,3,5-Trimethylbenzene	25	740	120	3600
1,2,4-Trimethylbenzene	25	1900	120	9500
1,3-Dichlorobenzene	25	Not Detected	150	Not Detected
1,4-Dichlorobenzene	25	460	150	2800
alpha-Chlorotoluene	25	Not Detected	130	Not Detected
1,2-Dichlorobenzene	25	Not Detected	150	Not Detected
1,2,4-Trichlorobenzene	100	Not Detected	740	Not Detected
Hexachlorobutadiene	100	Not Detected	1100	Not Detected

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
Toluene-d8	100	70-130
1,2-Dichloroethane-d4	91	70-130
4-Bromofluorobenzene	95	70-130

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Client Sample ID: Lab Blank

Lab ID#: 1011192A-03A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	w110906	Date of Collection: NA	
Dil. Factor:	1.00	Date of Analysis: 11/9/10 12:00 PM	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Freon 12	0.50	Not Detected	2.5	Not Detected
Freon 114	0.50	Not Detected	3.5	Not Detected
Chloromethane	2.0	Not Detected	4.1	Not Detected
Vinyl Chloride	0.50	Not Detected	1.3	Not Detected
1,3-Butadiene	0.50	Not Detected	1.1	Not Detected
Bromomethane	0.50	Not Detected	1.9	Not Detected
Chloroethane	0.50	Not Detected	1.3	Not Detected
Freon 11	0.50	Not Detected	2.8	Not Detected
Ethanol	2.0	Not Detected	3.8	Not Detected
Freon 113	0.50	Not Detected	3.8	Not Detected
1,1-Dichloroethene	0.50	Not Detected	2.0	Not Detected
Acetone	2.0	Not Detected	4.8	Not Detected
2-Propanol	2.0	Not Detected	4.9	Not Detected
Carbon Disulfide	0.50	Not Detected	1.6	Not Detected
3-Chloropropene	2.0	Not Detected	6.3	Not Detected
Methylene Chloride	0.50	Not Detected	1.7	Not Detected
Methyl tert-butyl ether	0.50	Not Detected	1.8	Not Detected
trans-1,2-Dichloroethene	0.50	Not Detected	2.0	Not Detected
Hexane	0.50	Not Detected	1.8	Not Detected
1,1-Dichloroethane	0.50	Not Detected	2.0	Not Detected
2-Butanone (Methyl Ethyl Ketone)	0.50	Not Detected	1.5	Not Detected
cis-1,2-Dichloroethene	0.50	Not Detected	2.0	Not Detected
Tetrahydrofuran	0.50	Not Detected	1.5	Not Detected
Chloroform	0.50	Not Detected	2.4	Not Detected
1,1,1-Trichloroethane	0.50	Not Detected	2.7	Not Detected
Cyclohexane	0.50	Not Detected	1.7	Not Detected
Carbon Tetrachloride	0.50	Not Detected	3.1	Not Detected
2,2,4-Trimethylpentane	0.50	Not Detected	2.3	Not Detected
Benzene	0.50	Not Detected	1.6	Not Detected
1,2-Dichloroethane	0.50	Not Detected	2.0	Not Detected
Heptane	0.50	Not Detected	2.0	Not Detected
Trichloroethene	0.50	Not Detected	2.7	Not Detected
1,2-Dichloropropane	0.50	Not Detected	2.3	Not Detected
1,4-Dioxane	2.0	Not Detected	7.2	Not Detected
Bromodichloromethane	0.50	Not Detected	3.4	Not Detected
cis-1,3-Dichloropropene	0.50	Not Detected	2.3	Not Detected
4-Methyl-2-pentanone	0.50	Not Detected	2.0	Not Detected
Toluene	0.50	Not Detected	1.9	Not Detected
trans-1,3-Dichloropropene	0.50	Not Detected	2.3	Not Detected
1,1,2-Trichloroethane	0.50	Not Detected	2.7	Not Detected
Tetrachloroethene	0.50	Not Detected	3.4	Not Detected

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Laboratory Services Since 1989

Client Sample ID: Lab Blank

Lab ID#: 1011192A-03A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	w110906	Date of Collection: NA	
Dil. Factor:	1.00	Date of Analysis: 11/9/10 12:00 PM	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Hexanone	2.0	Not Detected	8.2	Not Detected
Dibromochloromethane	0.50	Not Detected	4.2	Not Detected
1,2-Dibromoethane (EDB)	0.50	Not Detected	3.8	Not Detected
Chlorobenzene	0.50	Not Detected	2.3	Not Detected
Ethyl Benzene	0.50	Not Detected	2.2	Not Detected
m,p-Xylene	0.50	Not Detected	2.2	Not Detected
o-Xylene	0.50	Not Detected	2.2	Not Detected
Styrene	0.50	Not Detected	2.1	Not Detected
Bromoform	0.50	Not Detected	5.2	Not Detected
Cumene	0.50	Not Detected	2.4	Not Detected
1,1,2,2-Tetrachloroethane	0.50	Not Detected	3.4	Not Detected
Propylbenzene	0.50	Not Detected	2.4	Not Detected
4-Ethyltoluene	0.50	Not Detected	2.4	Not Detected
1,3,5-Trimethylbenzene	0.50	Not Detected	2.4	Not Detected
1,2,4-Trimethylbenzene	0.50	Not Detected	2.4	Not Detected
1,3-Dichlorobenzene	0.50	Not Detected	3.0	Not Detected
1,4-Dichlorobenzene	0.50	Not Detected	3.0	Not Detected
alpha-Chlorotoluene	0.50	Not Detected	2.6	Not Detected
1,2-Dichlorobenzene	0.50	Not Detected	3.0	Not Detected
1,2,4-Trichlorobenzene	2.0	Not Detected	15	Not Detected
Hexachlorobutadiene	2.0	Not Detected	21	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	97	70-130
1,2-Dichloroethane-d4	93	70-130
4-Bromofluorobenzene	94	70-130

Air TOXICS LTD.
Laboratory Services Since 1989

Client Sample ID: CCV

Lab ID#: 1011192A-04A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	w110902	Date of Collection: NA	
Dil. Factor:	1.00	Date of Analysis: 11/9/10 08:42 AM	

Compound	%Recovery
Freon 12	108
Freon 114	109
Chloromethane	110
Vinyl Chloride	118
1,3-Butadiene	117
Bromomethane	108
Chloroethane	121
Freon 11	101
Ethanol	115
Freon 113	105
1,1-Dichloroethene	110
Acetone	111
2-Propanol	114
Carbon Disulfide	117
3-Chloropropene	117
Methylene Chloride	104
Methyl tert-butyl ether	119
trans-1,2-Dichloroethene	115
Hexane	118
1,1-Dichloroethane	111
2-Butanone (Methyl Ethyl Ketone)	127
cis-1,2-Dichloroethene	110
Tetrahydrofuran	116
Chloroform	105
1,1,1-Trichloroethane	99
Cyclohexane	111
Carbon Tetrachloride	99
2,2,4-Trimethylpentane	115
Benzene	108
1,2-Dichloroethane	101
Heptane	116
Trichloroethene	103
1,2-Dichloropropane	112
1,4-Dioxane	107
Bromodichloromethane	100
cis-1,3-Dichloropropene	104
4-Methyl-2-pentanone	84
Toluene	107
trans-1,3-Dichloropropene	101
1,1,2-Trichloroethane	106
Tetrachloroethene	98

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: CCV

Lab ID#: 1011192A-04A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	w110902	Date of Collection: NA	
Dil. Factor:	1.00	Date of Analysis: 11/9/10 08:42 AM	

Compound	%Recovery
2-Hexanone	110
Dibromochloromethane	101
1,2-Dibromoethane (EDB)	102
Chlorobenzene	101
Ethyl Benzene	102
m,p-Xylene	104
o-Xylene	105
Styrene	107
Bromoform	100
Cumene	102
1,1,2,2-Tetrachloroethane	107
Propylbenzene	102
4-Ethyltoluene	105
1,3,5-Trimethylbenzene	102
1,2,4-Trimethylbenzene	102
1,3-Dichlorobenzene	96
1,4-Dichlorobenzene	95
alpha-Chlorotoluene	107
1,2-Dichlorobenzene	96
1,2,4-Trichlorobenzene	96
Hexachlorobutadiene	88

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	100	70-130
1,2-Dichloroethane-d4	90	70-130
4-Bromofluorobenzene	99	70-130

Air TOXICS LTD.
Laboratory Services Since 1989

Client Sample ID: LCS

Lab ID#: 1011192A-05A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	w110903	Date of Collection: NA	
Dil. Factor:	1.00	Date of Analysis: 11/9/10 09:47 AM	

Compound	%Recovery
Freon 12	109
Freon 114	112
Chloromethane	114
Vinyl Chloride	122
1,3-Butadiene	124
Bromomethane	113
Chloroethane	126
Freon 11	102
Ethanol	105
Freon 113	99
1,1-Dichloroethene	97
Acetone	109
2-Propanol	109
Carbon Disulfide	118
3-Chloropropene	119
Methylene Chloride	98
Methyl tert-butyl ether	118
trans-1,2-Dichloroethene	117
Hexane	117
1,1-Dichloroethane	108
2-Butanone (Methyl Ethyl Ketone)	118
cis-1,2-Dichloroethene	109
Tetrahydrofuran	118
Chloroform	105
1,1,1-Trichloroethane	100
Cyclohexane	114
Carbon Tetrachloride	99
2,2,4-Trimethylpentane	116
Benzene	109
1,2-Dichloroethane	101
Heptane	117
Trichloroethene	105
1,2-Dichloropropane	114
1,4-Dioxane	114
Bromodichloromethane	103
cis-1,3-Dichloropropene	109
4-Methyl-2-pentanone	84
Toluene	103
trans-1,3-Dichloropropene	106
1,1,2-Trichloroethane	110
Tetrachloroethene	102

Air TOXICS LTD.
Laboratory Services Since 1989

Client Sample ID: LCS

Lab ID#: 1011192A-05A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**w110903**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/9/10 09:47 AM**	

Compound	%Recovery
2-Hexanone	118
Dibromochloromethane	107
1,2-Dibromoethane (EDB)	112
Chlorobenzene	106
Ethyl Benzene	109
m,p-Xylene	111
o-Xylene	110
Styrene	113
Bromoform	106
Cumene	105
1,1,2,2-Tetrachloroethane	116
Propylbenzene	107
4-Ethyltoluene	108
1,3,5-Trimethylbenzene	107
1,2,4-Trimethylbenzene	108
1,3-Dichlorobenzene	101
1,4-Dichlorobenzene	101
alpha-Chlorotoluene	112
1,2-Dichlorobenzene	100
1,2,4-Trichlorobenzene	84
Hexachlorobutadiene	86

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	99	70-130
1,2-Dichloroethane-d4	91	70-130
4-Bromofluorobenzene	98	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCSD

Lab ID#: 1011192A-05AA

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**w110905**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/9/10 11:23 AM**	

Compound	%Recovery
Freon 12	112
Freon 114	114
Chloromethane	116
Vinyl Chloride	124
1,3-Butadiene	121
Bromomethane	117
Chloroethane	122
Freon 11	104
Ethanol	106
Freon 113	98
1,1-Dichloroethene	99
Acetone	109
2-Propanol	109
Carbon Disulfide	119
3-Chloropropene	118
Methylene Chloride	96
Methyl tert-butyl ether	121
trans-1,2-Dichloroethene	116
Hexane	117
1,1-Dichloroethane	109
2-Butanone (Methyl Ethyl Ketone)	126
cis-1,2-Dichloroethene	112
Tetrahydrofuran	116
Chloroform	106
1,1,1-Trichloroethane	100
Cyclohexane	114
Carbon Tetrachloride	101
2,2,4-Trimethylpentane	117
Benzene	111
1,2-Dichloroethane	100
Heptane	120
Trichloroethene	106
1,2-Dichloropropane	117
1,4-Dioxane	115
Bromodichloromethane	104
cis-1,3-Dichloropropene	109
4-Methyl-2-pentanone	84
Toluene	103
trans-1,3-Dichloropropene	109
1,1,2-Trichloroethane	116
Tetrachloroethene	104

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCSD

Lab ID#: 1011192A-05AA

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	w110905	Date of Collection: NA	
Dil. Factor:	1.00	Date of Analysis: 11/9/10 11:23 AM	

Compound	%Recovery
2-Hexanone	119
Dibromochloromethane	110
1,2-Dibromoethane (EDB)	116
Chlorobenzene	108
Ethyl Benzene	111
m,p-Xylene	113
o-Xylene	113
Styrene	116
Bromoform	107
Cumene	108
1,1,2,2-Tetrachloroethane	117
Propylbenzene	108
4-Ethyltoluene	110
1,3,5-Trimethylbenzene	109
1,2,4-Trimethylbenzene	106
1,3-Dichlorobenzene	100
1,4-Dichlorobenzene	101
alpha-Chlorotoluene	108
1,2-Dichlorobenzene	97
1,2,4-Trichlorobenzene	83
Hexachlorobutadiene	83

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	99	70-130
1,2-Dichloroethane-d4	90	70-130
4-Bromofluorobenzene	96	70-130

WEST COUNTY POWER PARTNERS, LLC

11401 Lamar Avenue
Overland Park, Kansas 66211
Tel: (913) 458-2000
Fax: (913) 458-2934

527 Logwood
San Antonio, TX 78221
Ph: 210-475-8000
Fax: 210-475-8060

Florida Power & Light Company
West County Energy Center – Unit 3
Permit No. – PSD-FL-396
DEP File No. – 0990646-002-AC

WCPP Project 161354
WCPP Files 14.0100/32.0440
WCPP3-2010-TP-320
December 29, 2010

E-mail, Express Mail

Ms. Elizabeth Walker
Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Subject: First Fire and Sync Completion Notification of West County Combustion Turbine (CT) 3A

Dear Ms. Walker:

On behalf of Florida Power & Light Company (FPL) and its Designated Representative, Sheila M. Wilkinson, the West County Power Partners, LLC (WCPP), EPC Contractor for construction of the new combined cycle generating unit at the FPL West County Energy Center – Unit 3, is submitting this notification in accordance with the regulations cited below.

This correspondence is to serve as notification to the Department, in accordance with 40 CFR 60.7(a)(3). FPL first fired Combustion Turbine (CT) 3A burning natural gas on December 26, 2010. First sync (Commercial Operation) for CT 3A occurred on December 29, 2010. Commercial Operation is defined in 40 CFR 72.2, Subpart A as, "beginning to generate electricity for sale including the sale of test generation."

If you have questions about this notification, please contact Terry Apple at (913) 458-7220 or John Rachal at (561) 784-8048.

Very truly yours,

WEST COUNTY POWER PARTNERS, LLC

Mike Perkins
Project Executive

WS:hs

cc: David McNeal, USEPA Air, Pesticides and Toxics Management (hard copy)
Art Diem, USEPA Clean Air Markets Division
Leigh Pell, FDEP Air Resource Management
Lee Hoefert, FDEP Southeast District
Mike Halpin, FDEP Sitting Coordination Office
Syed Arif, FDEP, Administrator
Kimberly Ousdahl, ACF/JB
Sheila M. Wilkinson, FPL Designated Representative
Laxmana Tallam, PBC Health Department (hard copy)

Permit File Scanning Request from _____

Priority: ☐-ASAP (Public Records Request, etc.) ☒-Place in Normal Scanning Queue

Facility ID	Project#/PATS#	Type	PSD #	Submittal Date	Batch #
1990646	002	AC	396		

☒ File Approved For Disposal ☐ Correspondence ☐ Intent ☐ Permit ☐ Draft (Title V)

☐ Return File to BAR ☐ Amendment ☐ Application ☐ OGC ☐ Proposed (Title V)

Document Date 12-30-10

Jim Stormer, PBC Health Department
Tom Tittle, PBC Health Department
Tom Young, FPL Construction Project General Manager
Carine Bullock, FPL Plant General Manager
David Fawcett, FPL West County Environmental Leader
Rachel Godino, FPL Environmental Project Manager
Audrey Rotrock, FPL Environmental
Robert Bennett, FPL Project Engineer
Mike Perkins, WCPP Project Executive
John Rachal, WCPP Senior Project Manager
Greg Hines, WCPP Site Environmental Manager
Terry Apple, WCPP Project Manager/ Project File
William Stevenson, WCPP Environmental Specialist

WEST COUNTY POWER PARTNERS, LLC

11401 Lamar Avenue
Overland Park, Kansas 66211
Tel: (913) 458-2000
Fax: (913) 458-2934

527 Logwood
San Antonio, TX 78221
Ph: 210-475-8000
Fax: 210-475-8060

Florida Power & Light Company
West County Energy Center – Units 1 & 2
Permit No. – PSD-FL-354
DEP File No. – 0990646-001-AC

WCPP Project 144553
WCPP Files 14.0100/32.0440/62.1003.02B
WCPP-2010-TP-685
December 28, 2010

E-mail, Express Mail

Ms. Elizabeth Walker
Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Subject: West County Units #1 and #2 Fuel Oil Air Permit Compliance Test Schedule
(Update to December 1, 2010 letter)

Dear Ms. Walker:

On behalf of Florida Power & Light Company (FPL) and its Designated Representative, Sheila M. Wilkinson, the West County Power Partners, LLC (WCPP), EPC Contractor for construction of the new combined cycle generating Unit 1 and 2 at the FPL West County Energy Center, is submitting the Fuel Oil Air Permit Compliance schedule in accordance with 40 CFR Part 60.8 and the State of Florida Conditions of Certification and Air Permit regulations. The updated test schedule is detailed in Table 1.

Table I. Dates for initial start up activities at West County Energy Center Units 1 & 2.

Units	Performance Emission Test	Opacity Observations
CT 1A	**January 20, 2011**	**January 20, 2011**
CT 1B	**December 19, 2010**	**December 19, 2010**
CT 1C	May 7, 2010	May 7, 2010
CT 2A	TBD	TBD
CT 2B	TBD	TBD
CT 2C	TBD	TBD
	60.8 (d) & PSD Permit Condition #22	60.7(a)(6), 60.11(b)& 60.7(a)(7)

Please note that the dates provided in Table I are subject to change. As the testing and tuning activities occur, WCPP will update FDEP of new revised dates when they are available. Please note that this notice is one of many notifications for West County Energy Center Units 1 and 2.

Permit File Scanning Request from _____

Priority: ☐-ASAP (Public Records Request, etc.) ☒-Place in Normal Scanning Queue

Facility ID	Project#/PATS#	Type	PSD #	Submittal Date	Batch #
0990646	001	AC	354		

☒ File Approved For Disposal ☐ Correspondence ☐ Intent ☐ Permit ☐ Draft (Title V)

☐ Return File to BAR ☐ Amendment ☐ Application ☐ OGC ☐ Proposed (Title V)

Document Date 12-30-16

If you have any questions about this notification, please contact Terry Apple at (913) 458-7220 or John Rachal at (561) 784-8048.

Very truly yours,

WEST COUNTY POWER PARTNERS, LLC

for Mike Perkins
Project Executive

WS:hs

cc: Dave McNeal, USEPA Air, Pesticides and Toxics Management (hard copy)
Art Diem, USEPA Clean Air Markets Division
Leigh Pell, FDEP Air Resource Management
Lee Hoefert, FDEP Southeast District
Tim Gray, FDEP Southeast District
Mike Halpin, FDEP Sitting Coordination Office
Syed Arif, FDEP, Administrator
Kimberly Ousdahl, ACF/JB
Sheila M. Wilkinson, FPL Designated Representative
Laxmana Tallam, PBC Health Department
Jim Stormer, PBC Health Department
Tom Tittle, PBC Health Department
Tom Young, FPL Construction Project General Manager
Carine Bullock, FPL Plant General Manager
David Fawcett, FPL West County Environmental Leader
Rachel Godino, FPL Environmental Project Manager
Audrey Rotrock, FPL Environmental
Robert Bennett, FPL Project Engineer
Mike Perkins, WCPP Project Executive
Greg Hines, WCPP Site Environmental Manager
Terry Apple, WCPP Project Manager/ Project File
William Stevenson, WCPP Environmental Specialist

WEST COUNTY POWER PARTNERS, LLC

11401 Lamar Avenue
Overland Park, Kansas 66211
Tel: (913) 458-2000
Fax: (913) 458-2934

527 Logwood
San Antonio, TX 78221
Ph: 210-475-8000
Fax: 210-475-8060

Florida Power & Light Company
West County Energy Center – Unit 3
Permit No. – PSD-FL-396
DEP File No. – 0990646-002-AC

WCPP Project 161354
WCPP Files 14.0100/32.0440
WCPP3-2010-TP-317
December 21, 2010

E-mail, Express Mail

Ms. Elizabeth Walker
Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Subject: First Fire and Sync Completion Notification of West County Combustion Turbine (CT) 3C

Dear Ms. Walker:

On behalf of Florida Power & Light Company (FPL) and its Designated Representative, Sheila M. Wilkinson, the West County Power Partners, LLC (WCPP), EPC Contractor for construction of the new combined cycle generating unit at the FPL West County Energy Center – Unit 3, is submitting this notification in accordance with the regulations cited below.

This correspondence is to serve as notification to the Department, in accordance with 40 CFR 60.7(a)(3). FPL first fired Combustion Turbine (CT) 3C burning natural gas on December 16, 2010. First sync (Commercial Operation) for CT 3C occurred on December 18, 2010. Commercial Operation is defined in 40 CFR 72.2, Subpart A as, "beginning to generate electricity for sale including the sale of test generation."

If you have questions about this request, please contact Terry Apple at (913) 458-7220 or John Rachal at (561) 784-8048.

Very truly yours,

WEST COUNTY POWER PARTNERS, LLC

for Mike Perkins
Project Executive

WS:hs

cc: Dave McNeal, USEPA Air, Pesticides and Toxics Management (hard copy)
Art Diem, USEPA Clean Air Markets Division
Leigh Pell, FDEP Air Resource Management
Lee Hoefert, FDEP Southeast District
Mike Halpin, FDEP Sitting Coordination Office
Syed Arif, FDEP, Administrator
Kimberly Ousdahl, ACF/JB
Sheila M. Wilkinson, FPL Designated Representative
Laxmana Tallam, PBC Health Department (hard copy)

Permit File Scanning Request from _____

Priority: ☐-ASAP (Public Records Request, etc.) ☒-Place in Normal Scanning Queue

Facility ID	Project#/PATS#	Type	PSD #	Submittal Date	Batch #
0990046	607	AC	413		

☒ File Approved For Disposal ☑ Correspondence ☐ Intent ☐ Permit ☐ Draft (Title V)

☐ Return File to BAR ☐ Amendment ☐ Application ☐ OGC ☐ Proposed (Title V)

Document Date 12-22-10

Jim Stormer, PBC Health Department
Tom Tittle, PBC Health Department
Tom Young, FPL Construction Project General Manager
Carine Bullock, FPL Plant General Manager
David Fawcett, FPL West County Environmental Leader
Rachel Godino, FPL Environmental Project Manager
Audrey Rotrock, FPL
Robert Bennett, FPL Project Engineer
Mike Perkins, WCPP Project Executive
John Rachal, WCPP Senior Project Manager
Greg Hines, WCPP Site Environmental Manager
Terry Apple, WCPP Project Manager/ Project File
William Stevenson, WCPP Environmental Specialist

WEST COUNTY POWER PARTNERS, LLC

11401 Lamar Avenue
Overland Park, Kansas 66211
Tel: (913) 458-2000
Fax: (913) 458-2934

527 Logwood
San Antonio, TX 78221
Ph: 210-475-8000
Fax: 210-475-8060

Florida Power & Light Company
West County Energy Center – Unit 3
Permit No. – PSD-FL-396
DEP File No. – 0990646-002-AC

WCPP Project 161354
WCPP Files 14.0100/32.0440
WCPP3-2010-TP-315
December 20, 2010

E-mail, Express Mail

Ms. Elizabeth Walker
Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Subject: Cooling Tower Unit 3 (Drift Rate)

Dear Ms. Walker:

On behalf of Florida Power & Light Company (FPL) and its Designated Representative, Sheila M. Wilkinson, the West County Power Partners, LLC (WCPP), EPC Contractor for construction of the new combined cycle generating unit at the FPL West County Energy Center – Unit 3, is submitting the following item to meet compliance with FPL West County Energy Center's Air Permit (Permit No. PSD-FPL-396), Section III, B. Cooling Tower (ID: 016):

- One 26-cell mechanical draft cooling towers – Certificate of Drift Rate

If you have any questions about this notification or the attachment, please contact Terry Apple at (913) 458-7220 or John Rachal at (561) 784-8048.

Very truly yours,

WEST COUNTY POWER PARTNERS, LLC

for Mike Perkins
Project Executive

WS:hs
attachment

cc: Dave McNeal, USEPA Air, Pesticides and Toxics Management (hard copy)
Art Diem, USEPA Clean Air Markets Division
Leigh Pell, FDEP Air Resource Management
Lee Hoefert, FDEP Southeast District
Mike Halpin, FDEP Sitting Coordination Office
Syed Arif, FDEP, Administrator
Kimberly Ousdahl, ACF/JB
Sheila M. Wilkinson, FPL Designated Representative

Permit File Scanning Request from _____

Priority: ☐-ASAP (Public Records Request, etc.) ☒-Place in Normal Scanning Queue

Facility ID	Project#/PATS#	Type	PSD #	Submittal Date	Batch #
0990048	0002	AC	394		

☒ File Approved For Disposal ☐ Correspondence ☐ Intent ☐ Permit ☐ Draft (Title V)

☐ Return File to BAR ☐ Amendment ☐ Application ☐ OGC ☐ Proposed (Title V)

Document Date 12-20-10

Laxmana Tallam, PBC Health Department
Jim Stormer, PBC Health Department
Tom Tittle, PBC Health Department
Tom Young, FPL Construction Project General Manager
Carine Bullock, FPL Plant General Manager
David Fawcett, FPL West County Environmental Leader
Rachel Godino, FPL Environmental Project Manager
Audrey Rotrock, FPL Environmental Services
Robert Bennett, FPL Project Engineer
Mike Perkins, WCPP Project Executive
John Rachal, WCPP Senior Project Manager
Greg Hines, WCPP Site Environmental Manager
Terry Apple, WCPP Project Manager/ Project File
William Stevenson, WCPP Environmental Specialist

Mr. Erik L Kolbe
West County Power Partners
c/o B&V Corporation
11401 Lamar Avenue
Overland Park, KS 66211
KolbeEL@bv.com

Thermal Engineering
Jason Nesseth
Director, Projects
Telephone: (303) 987-4046
Fax: (303) 987-0101
jason.nesseth@geagroup.com

07 Dec 2010

Subject: Drift Guarantee Letter, Rv1
West County Energy Center, Unit 3
Loxahatchee, Florida
Subcontract Number 161354.062.0601
GEA Job Number 09-001

Dear Mr. Kolbe:

GEA Power Cooling, Inc. hereby certifies that the cooling tower provided at the West County Energy Center (WCEC) have been designed and constructed in accordance with the drift rate guarantee as specified in the WCEC Air Permit (Permit No. PSD-FL-396). The cooling tower provided by GEA Power Cooling, Inc. is a 26-cell mechanical draft cooling tower. The cooling tower provided is certified to achieve the specified drift rate of no more than 0.0005 percent of the circulating water flow rate (Permit No. PSD-FPL-396, Section III. Emission Unit Specification Conditions, C. Cooling Tower (ID: 016), #2., Drift Rate).

Should you have any questions or require additional information, please do not hesitate to contact me at your convenience.

Best Regards,

GEA POWER COOLING, INC

Jason Nesseth
Project Manager

RRI Energy

121 Champion Way
Canonsburg, PA 15317
Writer's Direct Dial Number
724-235-4619

November 29, 2010

CERTIFIED MAIL
Florida Department of Environmental Protection
Division of Air Resource Management
Attn: CAIR NOx Ozone Season Compliance Report
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400

Dear CAIR NOx Ozone Season Compliance Report:

Enclosed are copies of the CAIR NOx Ozone Season Trading Program (CAIROS) allowance deduction emails from the U.S. EPA reflecting the CAIROS Allowance Serial Numbered allowances being surrender to the U.S. EPA for the RRI Energy Indian River and Osceola generating stations for compliance year 2010. Please note that there is no Compliance Certification Report under CAIROS.

Please feel free to contact me at 724-235-4619 or Mr. Justin Paronish at 724-597-8392 with any questions regarding these documents.

Sincerely,

Vincent J. Brisini
Alt. Authorized Account Representative

Permit File Scanning Request from _____

Priority: ☐-ASAP (Public Records Request, etc.) ☒-Place in Normal Scanning Queue

Facility ID	Project#/PATS#	Type	PSD #	Submittal Date	Batch #
0690077		AV			
0690196		AV			

☒ File Approved For Disposal ☑ Correspondence ☐ Intent ☐ Permit ☐ Draft (Title V)

☐ Return File to BAR ☐ Amendment ☐ Application ☐ OGC ☐ Proposed (Title V)

Document Date 12-2-10

2010 Annual Compliance - CAIR NOx Ozone Season Program

Specify Allowance Deductions (OPTIONAL)

11/24/2010

Confirmation

Program	Account Number	Account Name	Deduction Type	Order	Serial Prg	Year	Serial Start	Serial End	Amount	Errors
CAIROS	055318FACLTY	Indian River (55318)	Annual Deduction	1	CAIROS	2010	86317	86496	180	None

2010 Annual Compliance - CAIR NOx Ozone Season Program

Specify Allowance Deductions (OPTIONAL)

11/24/2010

Confirmation

Program	Account Number	Account Name	Deduction Type	Order	Serial Prg	Year	Serial Start	Serial End	Amount	Errors
CAIROS	055192FACLTY	RRI Energy Osceola	Annual Deduction	1	CAIROS	2010	86790	86824	35	None