Oleander Power Project

A Member of the Constellation Energy Group

1005 Brandon Shores Road
Baltimore, MD 21226
410-787-6530
410-787-5142 fax

May 24, 2002

US Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code 6204N
Washington, DC 20460

US Environmental Protection Agency
Region IV
61 Forsyth Street
Atlanta, GA 30303

Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Florida Department of Environmental Protection
Central District Office
3319 Maguire Boulevard
Orlando, FL 32803

Subject: Oleander Power Project, LP
ORIS Code 55286
Unit ID 002
40 CFR 75 New Unit Initial Use and Emission (First Fire) Notification

In accordance with the requirements of 40 CFR 75, please be advised that the actual date of initial use and emissions (first fire) for Unit 002 at the Oleander Power Project, LP occurred on May 20, 2002. Unit 002 attempted initial startup in late April but was taken out of service because of mechanical problems. Initial fire, as indicated above, was successfully completed after mechanical repairs were finished. As indicated in previous correspondence, any changes to the planned dates for Units 003 and 004 will be made as they occur in accordance with 40 CFR 75.61 (a)(2)(ii).

If you have any questions or need additional information please contact me at (410) 787-6530 or Ed Much at (410) 787 - 9073.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have 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.

Edward F. Tracey Jr.
Alternate Designated Representative

0090180-002-AV

cc: C. Fierstein
S. Carroll
P. Cain
E. Much/file

Oleander Power Project

A Member of the Constellation Energy Group

111 Market Place, Suite 200
Baltimore, MD 21202-7110
410-230-4600
410-230-4850 fax

April 12, 2002

US Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code 6204N
Washington, DC 20460

US Environmental Protection Agency
Region IV
61 Forsyth Street
Atlanta, GA 30303

Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Florida Department of Environmental Protection
Central District Office
3319 Maguire Boulevard
Orlando, FL 32803

Subject: Oleander Power Project, LP
ORIS Code 55286
Unit ID 001
40 CFR 75 New Unit Initial Use and Emission (First Fire) Notification

In accordance with the requirements of 40 CFR 75, please be advised that the actual date of initial use and emissions (first fire) for Unit 001 at the Oleander Power Project, LP occurred on April 10, 2002. As indicated in previous correspondence, any changes to the planned dates for Units 002, 003 and 004 will be made as they occur in accordance with 40 CFR 75.61 (a)(2)(ii).

If you have any questions or need additional information please contact me at (410) 230 – 4636 or Ed Much at (410) 787 - 9073.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have 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.

Craig E. Fierstein
Designated Representative

cc: S. Carroll
P. Cain
E. Much/file

Oleander Power Project

A Member of the Constellation Energy Group

111 Market Place, Suite 200
Baltimore, MD 21202-7110
410-230-4600
410-230-4850 fax

February 14, 2002

US Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code 6204N
Washington, DC 20460

US Environmental Protection Agency
Region IV
61 Forsyth Street
Atlanta, GA 30303

Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Florida Department of Environmental Protection
Central District Office
3319 Maguire Boulevard
Orlando, FL 32803

Subject: Oleander Power Project, LP
ORIS Code 55286
Unit ID 001, 002, 003, 004
40 CFR 75 New Unit Initial Use and Emission (First Fire) Notification

In accordance with the requirements of 40 CFR 75.61(a)(2)(i), please be advised that the planned dates of initial use and emissions for Unit 001, Unit 002, Unit 003 and Unit 004 at the Oleander Power Project, LP are March 27, April 4, June 6 and June 17, 2002, respectively. Any changes to these planned dates will be made in accordance with 40 CFR 75.61 (a)(2)(ii).

If you have any questions or need additional information please contact me at (410) 230 – 4636 or Ed Much at (410) 787 - 9073.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have 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.

Craig E. Fierstein
Designated Representative

cc: S. Carroll
P. Cain
E. Much
File

Oleander Power Project

A Member of the Constellation Energy Group

November 26, 2002

Florida Department of Environmental Protection
Bureau of Air Regulation, Title V Section
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Attention: Mr. Scott Sheplak, P.E.

RE: SUBMITTAL OF TITLE V PERMIT APPLICATION
OLEANDER POWER PROJECT, L.P., DEP FILE NO. 0090180 -002-AV

Dear Mr. Sheplak:

I am writing to withdraw our request to modify PSD permit, Monitoring Requirement No. 44 for the Oleander Power Project (OPP) made on November 4, 2002 in conjunction with OPP's initial Title V Air Operation Permit. After considering the matter further, we have concluded that leaving the original language of Condition 44 unchanged is preferred. Based on this withdrawal, we understand that the department will proceed with processing of the application submitted.

If you have any questions, please contact Ed Much at (410) 787-9073. Thank you.

Sincerely,

Steven Carroll

cc: T. Cascio, FLDEP
G. Kuberski, FLDEP Central District Office
E. Much

Cascio, Tom

From: Sheplak, Scott
Sent: Monday, December 16, 2002 9:06
To: Cascio, Tom
Subject: FW: Returned letter FDEP

please handle

-----Original Message-----
From: Harris, Warren [mailto:Warren.Harris@constellation.com]
Sent: Friday, December 13, 2002 5:04 PM
To: Sheplak, Scott
Cc: Carroll, Steve; Much, Edwin
Subject: Returned letter FDEP

Mr. Sheplak:

Oleander Power Project LP recently sent a letter to FDEP withdrawing our request to modify PSD permit conditions Requirement 44 in conjunction with Title V application. A copy of this letter was sent to Mr. T. Cascio at 111 S. Magnolia Drive, Suite 4, Tallahassee. This letter was returned as "unable to deliver as addressed." Do you have a current address for Mr. Cascio? I am unable to find him listed on the FDEP website.

Thank you for your consideration,

Warren Harris
Plant Engineer
Oleander Power Project O&M
555 Townsend Rd, Cocoa, FL 32926
(321) 638-4967 FAX (321) 638-0967
Mobile (321) 508-2750

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

Certified Mail -- Return Receipt Requested

November 15, 2002

Mr. Steven Carroll
General Manager and Responsible Official
Oleander Power Project, L.P.
555 Townsend Road
Cocoa, FL 32926

Re: Title V Air Operation Permit
DRAFT Permit No. **0090180-002-AV**
Oleander Power Project

Dear Mr. Carroll:

Thank you for your recent submission of an application for an initial Title V Air Operation Permit for the subject facility. We note that in your cover letter dated November 4, 2002, you also requested a minor modification to the facility's PSD permit to change Specific Condition **44.** by adding the phrase "or a separate analysis by the owner/operator or service contractor retained by the owner/operator" at the end of the first sentence.

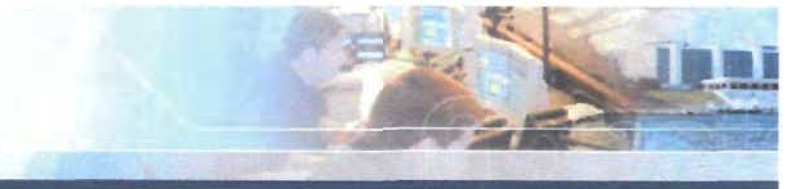
However, for this change to be acceptable to the Department, we would also require: (a) that the vendor's bill of lading be retained at the facility for each bulk shipment and be available for inspection, and (b) that an analysis of the as-fired sulfur content and nitrogen content in the fuel oil be performed prior to each use in the turbines. Thus, lacking this supplementary information, your application is deemed *incomplete.*

Please indicate if these additional requirements are acceptable. When we receive your response, we will continue processing your application. If you have questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Program

Constellation Energy Group



ABOUT US | MARKETING | GENERATION | DELIVERY | INVESTORS | NEWS CENTER | CAREERS | CONTACT U

PLANTS UNDER DEVELOPMENT

Asset Map

View Plants

GENERATION > FOSSIL PLANTS > OLEANDER

Oleander Power Plant Key Facts	
Location	Brevard Cour
Online	Summer 200
Fuel Type	Gas
Capacity	680 MW
CEG Ownership	100%

A 680-megawatt natural gas-fired facility, the Oleander Power Plant in Brevard County, Florid on a 37-acre site in an industrial area west of the City of Cocoa. The plant began commercial in the summer of 2002. Under the terms of the power purchase agreements signed in 2001, p the output of the Oleander plant will be sold to Seminole Electric Cooperative of Tampa and F Power & Light of N. Palm Beach. The electricity will be supplied as part of a seven-year powe contract, which will begin in winter 2002. The remainder of the plant"s output will be sold on th wholesale power market to help meet the growing demand for energy in Florida. Oleander wil enough power to serve the electricity needs of a quarter-million Florida homes on a hot summ afternoon.

MAP | CONTACT | S

/mmBtu, if a valid hour of
obtained, the owner or oper-
estimate and record emis-
sture, or flow data for the
our by means of the auto-
a acquisition and handling
accordance with the applica-
ure for missing data substi-
ubpart D of this part.

nal backup monitor require-
e owner or operator chooses
or more continuous emis-
oring systems, each of which
of monitoring the same
duct at a specific affected
oup of units using a common
the owner or operator shall
one monitoring system as
ry monitoring system, and
d this information in the
plan, as provided for in
owner or operator shall des-
other monitoring system(s)
monitoring system(s) in the
plan. The backup moni-
em(s) shall be designated as
backup monitoring sys-
n-redundant backup moni-
em(s), or reference method
stem(s), as described in
When the certified primary
system is operating and
control as defined in §75.24,
from the certified primary
system shall be reported as
ty-assured data. Thus, data
backup monitoring system
orted as valid, quality-as-
only when the backup is op-
not out-of-control as de-
.24 (or in the applicable ref-
od in appendix A of part 60
ter) and when the certified
nitoring system is not op-
is operating but out-of-con-
ticular monitor may be des-
h as a certified primary
one unit and as a certified
backup monitor for another

m measurement capability re-
The owner or operator shall
each continuous emission
system and component
apable of accurately meas-
rding, and reporting data,
ot incur an exceedance of
e range, except as provided in sections 2.1.1.5, 2.1.2.5, and 2.1.4.3 of appendix A to this part.

(g) *Minimum Recording and Reporting Requirements.* The owner or operator shall record and the designated representative shall report the hourly, daily, quarterly, and annual information collected under the requirements of this part as specified in subparts F and G of this part.

[58 FR 3701, Jan. 11, 1993, as amended at 60 FR 26519, May 17, 1995; 64 FR 28590, May 26, 1999]

§75.11 Specific provisions for monitoring SO_2 emissions (SO_2 and flow monitors).

(a) *Coal-fired units.* The owner or operator shall meet the general operating requirements in §75.10 for an SO_2 continuous emission monitoring system and a flow monitoring system for each affected coal-fired unit while the unit is combusting coal and/or any other fuel, except as provided in paragraph (e) of this section, in §75.16, and in subpart E of this part. During hours in which only gaseous fuel is combusted in the unit, the owner or operator shall comply with the applicable provisions of paragraph (e)(1), (e)(2), or (e)(3) of this section.

(b) *Moisture correction.* Where SO_2 concentration is measured on a dry basis, the owner or operator shall either:

(1) Report the appropriate fuel-specific default moisture value for each unit operating hour, selected from among the following: 3.0%, for anthracite coal; 6.0% for bituminous coal; 8.0% for sub-bituminous coal; 11.0% for lignite coal; 13.0% for wood; or

(2) Install, operate, maintain, and quality assure a continuous moisture monitoring system for measuring and recording the moisture content of the flue gases, in order to correct the measured hourly volumetric flow rates for moisture when calculating SO_2 mass emissions (in lb/hr) using the procedures in appendix F to this part. The following continuous moisture monitoring systems are acceptable: a continuous moisture sensor; an oxygen analyzer (or analyzers) capable of measuring O_2 both on a wet basis and on a dry basis; or a stack temperature sensor and a moisture look-up table, i.e., a psychometric chart (for saturated gas streams following wet scrubbers or other demonstrably saturated gas streams, only). The moisture monitoring system shall include as a component the automated data acquisition and handling system (DAHS) for recording and reporting both the raw data (e.g., hourly average wet-and dry-basis O_2 values) and the hourly average values of the stack gas moisture content derived from those data. When a moisture look-up table is used, the moisture monitoring system shall be represented as a single component, the certified DAHS, in the monitoring plan for the unit or common stack.

(c) *Unit with no location for a flow monitor meeting siting requirements.* Where no location exists that satisfies the minimum physical siting criteria in appendix A to this part for installation of a flow monitor in either the stack or the ducts serving an affected unit or installation of a flow monitor in either the stack or ducts is demonstrated to the satisfaction of the Administrator to be technically infeasible, either:

(1) The designated representative shall petition the Administrator for an alternative method for monitoring volumetric flow in accordance with §75.66; or

(2) The owner or operator shall construct a new stack or modify existing ductwork to accommodate the installation of a flow monitor, and the designated representative shall petition the Administrator for an extension of the required certification date given in §75.4 and approval of an interim alternative flow monitoring methodology in accordance with §75.66. The Administrator may grant existing Phase I affected units an extension to January 1, 1995, and existing Phase II affected units an extension to January 1, 1996 for the submission of the certification application for the purpose of constructing a new stack or making substantial modifications to ductwork for installation of a flow monitor; or

(3) The owner or operator shall install a flow monitor in any existing location in the stack or ducts serving the affected unit at which the monitor can achieve the performance specifications of this part.

(d) *Gas-fired and oil-fired units.* The owner or operator of an affected unit that qualifies as a gas-fired or oil-fired unit, as defined in §72.2 of this chapter, based on information submitted by the designated representative in the monitoring plan, shall measure and record SO_2 emissions:

(1) By meeting the general operating requirements in §75.10 for an SO_2 continuous emission monitoring system and flow monitoring system. If this option is selected, the owner or operator shall comply with the applicable provisions in paragraph (e)(1), (e)(2), or (e)(3) of this section during hours in which the unit combusts only gaseous fuel;

(2) By providing other information satisfactory to the Administrator using the applicable procedures specified in appendix D to this part for estimating hourly SO_2 mass emissions; or

(3) By using the low mass emissions excepted methodology in §75.19(c) for estimating hourly SO_2 mass emissions if the affected unit qualifies as a low mass emissions unit under §75.19(a) and (b).

(e) *Units with SO_2 continuous emission monitoring systems during the combustion of gaseous fuel.* The owner or operator of an affected unit with an SO_2 continuous emission monitoring system shall, during any hour in which the unit combusts only gaseous fuel, determine SO_2 emissions in accordance with paragraph (e)(1), (e)(2) or (e)(3) of this section, as applicable.

(1) If the gaseous fuel meets the definition of "pipeline natural gas" or "natural gas" in §72.2 of this chapter, the owner or operator may, in lieu of operating and recording data from the SO_2 monitoring system, determine SO_2 emissions by using Equation F-23 in appendix F to this part. Substitute into Equation F-23 the hourly heat input, calculated using a certified flow monitoring system and a certified diluent monitor, in conjunction with the appropriate default SO_2 emission rate from section 2.3.1.1 or 2.3.2.1.1 of appendix D to this part, and Equation D-5 in appendix D to this part. When this option is chosen, the owner or operator shall perform the necessary data acquisition and handling system tests under §75.20(c), and shall meet all quality

from samples taken monthly or more frequently;

(d) For fuels delivered in shipments or lots, the highest hydrogen sulfide content from all shipments or lots received in a one year period; or

(e) the highest hydrogen sulfide content measured during a 720-hour demonstration conducted using the procedures of section 2.3.6 of this appendix.

2.3.2.2 Hourly Heat Input Rate

Calculate hourly heat input rate for natural gas combustion, in mmBtu/hr, using the procedures in section 3.4.1 of this appendix. Use the measured fuel flow rate from section 2.1 of this appendix and the gross calorific value from section 2.3.4.2 of this appendix in the calculations.

2.3.2.3 SO_2 Mass Emission Rate and Hourly Mass Emissions

For natural gas combustion, calculate the SO_2 mass emission rate, in lb/hr, using Equation D–5 in section 3.3.2 of this appendix, when the default SO_2 emission rate is used. Then, use the calculated SO_2 mass emission rate and the unit operating time to determine the hourly SO_2 mass emissions from natural gas combustion, in lb, using Equation D–12 in section 3.5.1 of this appendix.

2.3.2.4 Documentation that a Fuel Is Natural Gas

(a) For natural gas, provide information in the monitoring plan required under §75.53, demonstrating that the definition of natural gas in §72.2 of this chapter has been met. The information must demonstrate that the fuel has a hydrogen sulfide content of less than 1.0 grain/100 scf. This demonstration must be made using one of the following sources of information:

(1) The gas quality characteristics specified by a purchase contract or by a transportation contract;

(2) A certification of the gas vendor, based on routine vendor sampling and analysis (minimum of one year of data with samples taken monthly or more frequently);

(3) At least one year's worth of analytical data on the fuel hydrogen sulfide content from samples taken monthly or more frequently;

(4) For fuels delivered in shipments or lots, sulfur content from all shipments or lots received in a one year period; or

(5) Data from a 720-hour demonstration conducted using the procedures of section 2.3.6 of this appendix.

(b) When a 720-hour test is used for initial qualification as natural gas, the owner or operator shall continue sampling the fuel for hydrogen sulfide at least once per month for one year after the initial qualification period. The use of the default natural gas SO_2 emission rate under 2.3.2.1.1 is not allowed if any sample during the one year period has a hydrogen sulfide content greater than 1.0 grain/100 scf.

2.3.3 SO_2 Mass Emissions From the Gaseous Fuel

The owner or operator of a unit may determine SO_2 mass emissions using this section for any gaseous fuel (including fuels such as refinery gas, landfill gas, digester gas, coke oven gas, blast furnace gas, coal-derived gas, producer gas or any other gas which may have a variable sulfur content).

2.3.3.1 Sulfur Content Determination

2.3.3.1.1 Analyze the total sulfur content of the gaseous fuel in grain/100 scf, at the frequency specified in Table D–5 of this appendix. That is: for fuel delivered in discrete shipments or lots, sample each shipment or lot; for fuel transmitted by pipeline, if a demonstration is provided under section 2.3.5 of this appendix showing that the gaseous fuel has a "low sulfur variability," determine the sulfur content daily using either manual sampling or a gas chromatograph; and for all other gaseous fuels, determine the sulfur content on an hourly basis using a gas chromatograph.

2.3.3.1.2 Use one of the following methods when using manual sampling (as appropriate to the type of gas combusted) to determine the sulfur content of the fuel: ASTM D1072–90, "Standard Test Method for Total Sulfur in Fuel Gases", ASTM D4468–85 (Reapproved 1989) "Standard Test Method for Total Sulfur in Gaseous Fuels by Hydrogenolysis and Rateometric Colorimetry," ASTM D3246–92 "Standard Test Method for Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence," or ASTM D1266–91 (Reapproved 1987) "Standard Test Method for Sulfur in Petroleum Gas By Oxidative Microcoulometry" (incorporated by reference under §75.6).

2.3.3.1.3 The sampling and analysis of daily manual samples may be performed by the owner or operator, an outside laboratory or the gas supplier. If hourly sampling with a gas chromatograph is required, or a unit chooses to use an online gas chromatograph to determine daily fuel sulfur content, the owner or operator shall develop and implement a program to quality assure the data from the gas chromatograph, in accordance with the manufacturer's recommended procedures. The quality assurance procedures shall be kept on-site, in a form suitable for inspection.

2.3.3.1.4 Results of all sample analyses must be available no later than thirty calendar days after the sample is taken.

2.3.3.2 SO_2 Mass Emission Rate

Calculate the SO_2 mass emission rate for the gaseous fuel, in lb/hr, using equation D–4 in section 3.3.1 of this appendix. Use the appropriate sulfur content, in equation D–4, as specified in Table D–5 of this appendix. That is, for fuels delivered by pipeline which demonstrate a low sulfur variability (under section 2.3.5 of this appendix) use either the daily value or the highest value in the previous 30 days or for fuels requiring hourly sulfur content sampling with a gas chromatograph use the actual hourly sulfur content.

2.3.3.3 Hourly Heat Input Rate

Calculate the hourly heat input rate for combustion of the gaseous fuel, using the provisions in section 3.4.1 of this appendix. Use the measured fuel flow rate from section 2.1 of this appendix and the gross calorific value from section 2.3.4.3 of this appendix in the calculations.

2.3.4 Gross Calorific Values for Gaseous Fuels

Determine the GCV of each gaseous fuel at the frequency specified in this section, using one of the following methods: ASTM D1826–88, ASTM D3588–91, ASTM D4891–89, GPA Standard 2172–86 "Calculation of Gross Heating Value, Relative Density and Compressibility Factor for Natural Gas Mixtures from Compositional Analysis," or GPA Standard 2261–90 "Analysis for Natural Gas and Similar Gaseous Mixtures by Gas Chromatography" (incorporated by reference under §75.6 of this part). Use the appropriate GCV value, as specified in section 2.3.4.1, 2.3.4.2 or 2.3.4.3 of this appendix, in the calculation of unit hourly heat input rates.

2.3.4.1 GCV of Pipeline Natural Gas

Determine the GCV of fuel that is pipeline natural gas, as defined in §72.2 of this chapter, at least once per calendar month. For GCV used in calculations use the specification in Table D–5: either the value from the most recent monthly sample, the highest value specified in a contract or tariff sheet, or the highest value from the previous year. The final GCV value from the most recent monthly sample shall be used for any month in which that value is higher than a contract limit. If a unit combusts pipeline natural gas for less than 48 hours during a calendar month, the sampling and analysis requirement for GCV is waived for that calendar month. The preceding waiver is limited by the condition that at least one analysis for GCV must be performed for each quarter the unit operates for any amount of time.

2.3.4.2 GCV of Natural Gas

Determine the GCV of fuel that is natural gas, as defined in §72.2 of this chapter, on a monthly basis, in the same manner as described for pipeline natural gas in section 2.3.4.1 of this appendix.

2.3.4.3 GCV of Other Gaseous Fuels

For gaseous fuels other than natural gas or pipeline natural gas, determine the GCV as specified in section 2.3.4.3.1, 2.3.4.3.2 or 2.3.4.3.3, as applicable.

2.3.4.3.1 For a gaseous fuel that is delivered in discrete shipments or lots, determine the GCV for each shipment or lot. The determination may be made by sampling each delivery or by sampling the supply tank after each delivery. For sampling of each delivery, use the highest GCV in the previous year's samples. For sampling from the tank after each delivery, use either the most recent GCV sample or the highest GCV in the previous year.

2.3.4.3.2 For any gaseous fuel that does not qualify as pipeline natural gas or natural gas and which is not delivered in shipments or lots which performs the required 720 hour test under section 2.3.5 of this appendix, and the results of the test demonstrate that the gaseous fuel has a low GCV variability, determine the GCV at least monthly. In calculations of hourly heat input for a unit, use either the most recent monthly sample or the highest fuel GCV from the previous year's samples.

2.3.4.3.3 For any other gaseous fuel, determine the GCV at least daily and use the actual fuel GCV in calculations of unit hourly heat input. If an online gas chromatograph or on-line calorimeter is used to determine fuel GCV each day, the owner or operator shall develop and implement a program to quality assure the data from the gas chromatograph or on-line calorimeter, in accordance with the manufacturer's recommended procedures. The quality assurance procedures shall be kept on-site, in a form suitable for inspection.

2.3.5 Demonstration of Fuel GCV Variability

(a) This demonstration is required of any fuel which does not qualify as pipeline natural gas or natural gas, and is not delivered only in shipments or lots. The demonstration data shall be used to determine whether daily or monthly sampling of the GCV of the gaseous fuel or blend is required.

(b) To make this demonstration, proceed as follows. Provide a minimum of 720 hours of data, indicating the GCV of the gaseous fuel or blend (in Btu/100 scf). The demonstration data shall be obtained using either: hourly sampling and analysis using the methods in section 2.3.4 to determine GCV of the fuel; an on-line gas chromatograph capable of determining fuel GCV on an hourly basis; or an on-line calorimeter. For gaseous fuel produced by a variable process, the data shall be

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

Certified Mail -- Return Receipt Requested

November 15, 2002

Mr. Steven Carroll
General Manager and Responsible Official
Oleander Power Project, L.P.
555 Townsend Road
Cocoa, FL 32926

Re: Title V Air Operation Permit
DRAFT Permit No. **0090180-002-AV**
Oleander Power Project

Dear Mr. Carroll:

Thank you for your recent submission of an application for an initial Title V Air Operation Permit for the subject facility. We note that in your cover letter dated November 4, 2002, you also requested a minor modification to the facility's PSD permit to change Specific Condition **44.** by adding the phrase "or a separate analysis by the owner/operator or service contractor retained by the owner/operator" at the end of the first sentence.

However, for this change to be acceptable to the Department, we would also require: (a) that the vendor's bill of lading be retained at the facility for each bulk shipment and be available for inspection, and (b) that an analysis of the as-fired sulfur content and nitrogen content in the fuel oil be performed prior to each use in the turbines. Thus, lacking this supplementary information, your application is deemed *incomplete.*

Please indicate if these additional requirements are acceptable. When we receive your response, we will continue processing your application. If you have questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Program

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Steven Carroll
General Manager and Responsible Official
Oleander Power Project,L.P.
555 Townsend Road
Cocoa, Florida 32926

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery 11/18/02

C. Signature
X [signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)*
7000 0600 0021 6524 2694

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. Steven Carroll

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here
Mailed 11/15/02
11/15/02
cc - Tom Cook

Name (Please Print Clearly) (to be completed by mailer)
Mr. Steven Carroll
Street, Apt. No.; or PO Box No.
555 Townsend Road
City, State, ZIP+4
Cocoa, Florida 32926

PS Form 3800, July 1999 See Reverse for Instructions

7000 0600 0021 6524 2694