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BUREAU OF AIR REGULATION



Orlando Cogeneration Ltd.
8275 Exchange Drive
Orlando, FL 32809
Telephone: (407) 851-1350
Facsimile: (407) 851-1686

April 09, 2008

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

Subject: Orlando CoGen Limited, L.P.
Facility ID: 0950203; ORIS Code: 54466; Air Permit No: 0950203-007-AC
Request for Extension of Two Hour Limit for Excess Emissions during Startup

Dear Ms. Vielhauer:

This letter is to formally request that Orlando CoGen Limited, L.P. (the Facility) be granted a waiver from Section III.A.11 and Section III.B.10 which allow excess emissions from the Facility during startup to occur no more than two hours in any 24 hour period unless specifically authorized by the Department for a longer duration.

Orlando CoGen is currently in an extended maintenance outage and is installing a new compressor section on the combustion turbine. The Department issued a permit (No. 0950203-007-AC) for this upgrade on February 6, 2008. On February 7, 2008 the Facility provided Orange County Environmental Protection Division (OCEPD) a commencement of construction notification associated with the combustion turbine upgrade. It is currently projected that the combustion turbine re-commissioning will commence during the week of May 5, 2008.

It is anticipated that multiple starts and stops and extended periods of low load runs will be required to complete the gas valve mapping necessary as part of commissioning. This could result in the Facility exceeding the two hour startup limitation referenced above for NOx emissions, which are continuously monitored using a CEMS. Therefore the Facility formally requests that the Facility be authorized for excess emissions of up to six (6) hours during a 24 hour period over a five (5) day period beginning with the start of the combustion turbine testing.

During the period of startup and testing the Facility will utilize the best operational practices to minimize excess emissions and to limit the duration of such excess emissions. The Facility will also notify John Kasper of OCEPD one (1) hour prior to the planned startup of the combustion turbine. If requested by the Department or OCEPD, the Facility will provide a written report summarizing the NOx emissions during commissioning.

If there are any questions regarding this submittal, please do not hesitate to contact me at 407-851-1350 or via e-mail at jim.murray@nsgen.com.

Sincerely,

A handwritten signature in black ink, appearing to read "James Murrery". The signature is fluid and cursive, with a large initial "J" and "M".

James Murrery
Plant Manager

Cc: Hamp Pridgen, Orange County Environmental Protection Division
John Kasper , Orange County Environmental Protection Division
David Good, Orlando Cogen
Dave Kellermeyer, NSGS