



Orlando Cogen Limited, L.P.
8275 Exchange Drive
Orlando, FL 32809

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BUREAU OF
AIR REGULATION

March 22, 2011

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: 0950203-009-AV
Request for Extension of Two Hour Limit for Excess Emissions during Startup

0950203-010-AC

Dear Ms. Vielhauer:

This letter is to formally request that Orlando CoGen Limited, L.P. (the Facility) be granted a waiver from Section III. C.8 which allows 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.

The Facility is currently in a 3 year maintenance cycle outage with a projected start up on April 12, 2011. During this outage the Facility's gas turbine manufacturer (Alstom) will be implementing some updated gas valve mapping curves.

It is anticipated that multiple starts and stops and extended periods of low load runs will be required to complete this process. 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 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 Orange County Environmental Protection Division 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,

James Murray
Plant Manager

Cc: Jodi Dittell, Orange County Environmental Protection Division
David Good, Orlando Cogen
Dave Kellermeyer, NSGS