

Sheplak, Scott

From: Walker, Elizabeth (AIR)
Sent: Friday, August 29, 2008 8:30 AM
To: Sheplak, Scott; Holtom, Jonathan
Cc: Machinski, Susan
Subject: RE: Applications

I sent them DHL Ground today. Hopefully, Susan, you will see it on Tuesday or Wednesday.

Elizabeth Walker

Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9505

From: Sheplak, Scott
Sent: Thursday, August 28, 2008 5:02 PM
To: Holtom, Jonathan
Cc: Walker, Elizabeth (AIR); Machinski, Susan
Subject: RE: Applications

Roger.

Susan, I have some stuff to keep with the file for each one. I can brief you when you receive. Talk with you soon.

From: Holtom, Jonathan
Sent: Thursday, August 28, 2008 3:07 PM
To: Sheplak, Scott
Cc: Walker, Elizabeth (AIR); Machinski, Susan
Subject: Applications

Scott,

Please give your copies of the applications and any notes, etc. that you have for Brandy Branch and Orlando Cogen to Elizabeth, ASAP. She will make sure they get to Susan.

Thanks!

Jon

Permit File Scanning Request from Elizabeth

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

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
0956263	609	AG-AV		OCT 06 2010	

File Approved For Disposal

Return File to BAR

Correspondence Intent Permit Draft

Amendment Application OGC Proposed

Document Date 6-29-08

Sheplak, Scott~~File~~

From: Holtom, Jonathan
Sent: Wednesday, July 09, 2008 10:01 AM
To: 'Osborn, Scott'
Cc: 'Kellermeyer, Dave'; 'Murray, James'; 'Good, Dave'; Sheplak, Scott; Vielhauer, Trina
Subject: RE: Orlando Cogen TV Renewal & Revision

For applications that are submitted in hard copy rather than through the EPSAP system, the official date of receipt has traditionally been the day that we receive the signed and certified application. In the spirit of electronic transmittal of documents, we are agreeable to consider the receipt date for this application as the day the PDF version was received. At this point, however, we do still have to receive the hard copies (which we did on Monday) for our official file. So for now, just a PDF version of a document will not suffice for a timely submittal if it is not quickly followed by the hard copy. The other option is to submit applications using EPSAP. It is your choice.

I hope this helps. If you have any questions, please don't hesitate to contact me.

Jon Holtom, P.E.
 Title V Section, Bureau of Air Regulation
 (850) 921-9531

From: Osborn, Scott [mailto:Scott_Osborn@golder.com]
Sent: Tuesday, July 08, 2008 5:42 PM
To: Holtom, Jonathan
Cc: Kellermeyer, Dave; Murray, James; Good, Dave
Subject: RE: Orlando Cogen TV Renewal & Revision

I received a notice that the hard copy had been delivered on Monday. Was your official date of receipt 7/2 (below) or 7/7 (the hard copy delivery)?

Scott Osborn (P.E.) | Senior Consultant | Golder Associates Inc.
 5100 West Lemon Street, Suite 114, Tampa, Florida, USA 33609
 T: +1 (813) 287-1717 | D: +1 (813) 769-5304 | F: +1 (813) 287-1716 | C: +1 (727) 278-3358 | E: Scott_Osborn@golder.com |
www.golder.com

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Please consider the environment before printing this email.

From: Osborn, Scott
Sent: Wednesday, July 02, 2008 1:43 PM
To: 'Holtom, Jonathan'
Cc: 'Kellermeyer, Dave'; Murray, James; Good, Dave
Subject: Orlando Cogen TV Renewal & Revision

Attached is an electronic version of the air application package for our requested TV renewal and revision. The original and 3 copies are also being sent to your attention in today's mail. Please don't hesitate to contact me at the number below, if you should have any questions or comments.

7/9/2008

Permit File Scanning Request from Elizabeth

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

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
0950205	009	AGAV		OCT 06 2010	

- | | | | | |
|--|--|--------------------------------------|---------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> File Approved For Disposal | <input checked="" type="checkbox"/> Correspondence | <input type="checkbox"/> Intent | <input type="checkbox"/> Permit | <input type="checkbox"/> Draft |
| <input type="checkbox"/> Return File to BAR | <input type="checkbox"/> Amendment | <input type="checkbox"/> Application | <input type="checkbox"/> OGC | <input type="checkbox"/> Proposed |

Document Date 7-9-08

Scott Osbourn (P.E.) | Senior Consultant | Golder Associates Inc.

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Please consider the environment before printing this email.

Sheplak, Scott

From: John.Kasper@ocfl.net
Sent: Thursday, July 10, 2008 2:21 PM
To: Sheplak, Scott
Cc: Ilka.Bundy@ocfl.net; Jane.Heppner@ocfl.net; Jodi.Dittell@ocfl.net
Subject: RE: Compliance Review of Title V Air Operation Permit Renewal Application

- file -

There are no compliance issues right now. However, we just got in their annual compliance test and RATA test reports and have not yet reviewed those reports. We will review them in the next couple of weeks and copy you on our review results letter if you like. One of our compliance inspectors audited the tests and indicated the results appeared acceptable, though the operating rate during the test may have been below 90% of permitted capacity.

John Kasper
 OCEPD
 407-836-1443

PLEASE NOTE: Florida has a very broad public records law (F. S. 119). All e-mails to and from County Officials are kept as a public record. Your e-mail communications, including your e-mail address may be disclosed to the public and media at any time.

-----Original Message-----

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Thursday, July 10, 2008 12:11 PM
To: Kasper, John
Subject: Compliance Review of Title V Air Operation Permit Renewal Application

Mr. Kasper:

Please pass this onto compliance ...

Northern Star Generation Services Company, LLC - Orlando Cogen Limited, L.P.

Project No.: 0950203-009-AV

On July 7, 2008, our office received the subject application via hard copy.

Each applicant's Responsible Official (R.O.) for a Title V permit is required to sign a certification of compliance and is also required to report the compliance status of each emissions unit. Any non-compliance at the time of application and/or during the processing of the application requires a compliance plan to be submitted.

The applicant certified compliance in this permit application {see this place in the application: (1) Application Information - R.O. Certification Statement, item 6.}

Please review this facility's status with your compliance & enforcement staff. Please notify me via email or hard-copy **either**:

- a. there are no outstanding compliance or enforcement actions with this facility; **or**
- b. the following outstanding compliance & enforcement issues exist (please list).

Please review the compliance status of this facility and send us your written comments within 30 days (**no later than August 7th**). Thank you for your cooperation.

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

7/10/2008

Permit File Scanning Request from Elizabeth

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

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
0950763	009	ACAV		OCT 06 2010	

- File Approved For Disposal
- Return File to BAR

- Correspondence
- Intent
- Permit
- Draft
- Amendment
- Application
- OGC
- Proposed

Document Date 7-10-08



ENVIRONMENTAL PROTECTION DIVISION

Lori Cunniff, Manager
800 Mercy Drive, Suite 4
Orlando, Florida 32808-7896
407-836-1400 • Fax 407-836-1499
www.occpd.org

July 29, 2008

Mr. Jim Murray
Plant Manager

Northern Star Generation Services – Orlando Cogen Plant
8275 Exchange Drive
Orlando, FL 32809

**Subject: Compliance Test Report received July 10, 2008, for Compliance Test Performed on June 3, 2008 at Orlando Cogen Plant in Orlando, Florida
Relative Accuracy Test Audit Report received July 10, 2008, for Relative Accuracy Test Audit Performed on June 4, 2008 at Orlando Cogen Plant in Orlando, Florida
Facility ID 0950203**

Dear Mr. Murray:

Orange County Environmental Protection Division (EPD) personnel audited portions of the subject compliance and RATA tests for your facility on the subject dates. EPD has also reviewed the subject test reports and found the following.

1. EPD was timely notified of the subject tests as required by condition C.25 of permit 0950203-006-AV.
2. EPD personnel audited portions of the subject tests, and the test work appeared to be performed satisfactorily.
3. EPD received the test reports July 10, 2008, within the 45-day period allowed by condition C.27(b) of permit 0950203-006-AV.
4. For the combustion turbine part of the test, the compliance test report indicates that the average CO emission was 1.25 ppmvd at 15% O₂ (2.68 lb/hr), which is below the emission limit of 10.0 ppmvd at 15% O₂ (22.3 lb/hr) in condition 7 of permit 0950203-007-AC. For the duct burner, the compliance test report indicates that the average CO emission from the duct burner was 0.013 lb/MMBTU (1.52 lb/hr), which is below the emission limit of 0.1 lb/MMBTU (12.2 lb/hr) in condition 7 of permit 0950203-007-AC.
5. For the combustion turbine part of the test, the compliance test report indicates that the average NOx emission was 14.15 ppmvd at 15% O₂ (50.3 lb/hr), which is below the emission limit of 15.0 ppmvd at 15% O₂ (63.1 lb/hr) in condition 7 of permit 0950203-007-AC. For the combustion turbine and duct burner part of the test, the compliance test report indicates that the average NOx emission from the duct burner was 0.034 lb/MMBTU (3.97 lb/hr), which is below the emission limit of 0.10 lb/MMBTU (12.2 lb/hr) in condition 7 of permit 0950203-007-AC.

July 29, 2008
Mr. Jim Murray
Page 2

6. The test report also states that the combustion turbine heat input rate for the test was an average of 933.4 MMBTU/hr LHV at ISO conditions. The turbine heat input rate limit is 980 MMBTU/hr LHV at ISO conditions as given in Section 3 Condition 7 (Table), Note 4.a. of permit 0950203-007-AC. The stated turbine heat input rate for the test was 95.2% of the permit limit, so **the turbine may operate at the permitted rate of 980 MMBTU/hr LHV at ISO conditions.**
7. The test report also states that the duct burner average heat input rate was 116.7 MMBTU/hr HHV. Given the higher heating value of the fuel as 1026.5 BTU/CF, and a lower heating value of the fuel as 925.3 BTU/CF, EPD calculates 116.7 MMBTU/hr HHV to be equivalent to 105.2 MMBTU/hr LHV. The duct burner heat input rate limit is 122 MMBTU/hr LHV as given in Section 3 Condition B.1. of permit 0950203-006-AV and Section 3 Condition 7 (Table), Note 4.b. of permit 0950203-007-AC. For this compliance test, the duct burner was operated at 86.2% of the permit limit. This is less than 90% of the permitted rate, so the duct burner may operate at 110% of the compliance test rate according to Section 3 Condition B.13 of permit 0950203-006-AV. **This limits the duct burner to a maximum heat input rate of 110% of 105.2 MMBTU/hr LHV, or 115.7 MMBTU/hr LHV.**
8. The RATA test report indicated that the relative accuracy (RA) of the facility CEMS was 8.19%, with a monitoring system mean value within 0.0035 lb/MMBTU of the reference method value. The monitoring system is a NO_x-diluent monitoring system, with O₂ as the diluent. The facility is a low NO_x emitter, with NO_x emissions of 0.052 lb/MMBTU being less than the 0.200 lb/MMBTU limit for low emitters. The applicable standards are 40 CFR 60 Appendix B and 40 CFR 75 Appendix B. In Part 60 Appendix B Section 13, the requirement is for RA to be less than 20%, and the results of 8.19% RA meet this standard. In 40 CFR Part 75, Appendix B, Section 2.3.1.2, semi-annual RATA testing is required unless certain accuracy standards are met that allow for annual RATA testing. In Part 75 for low NO_x emitters, RATA results with RA less than or equal to 7.5% or within ± 0.015 lb/MMBTU of the reference method value, allow for annual RATA testing. The monitoring system accuracy of this test, within 0.0035 lb/MMBTU of the reference method value, allow for **annual RATA testing.**

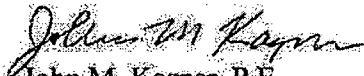
July 29, 2008
Mr. Jim Murray
Page 3

9. The report appears to conform to the requirements of Rule 62-297.310(8).

The test reports are therefore accepted by this agency with the duct burner heat input rate limit noted.

If you have any questions or comments, please contact me at the letterhead address.

Sincerely,



John M. Kasper, P.E.
Engineer III


(4) DL/JK/JD/HP:bh

c: Hamp Pridgen, Air Program Manager, Environmental Protection Division
James Bradner, P.E., Florida Department of Environmental Protection, Central
District
Scott Sheplak, P.E., FDEP Tallahassee
Dagmar Fick, Air Consulting and Engineering, Inc.

Sheplak, Scott

From: Betty.Hill@ocfl.net
Sent: Wednesday, July 30, 2008 11:01 AM
To: Sheplak, Scott; Bradner, James; jim.murray@northernstargen.com
Cc: Jodi.Dittell@ocfl.net; John.Kasper@ocfl.net; Darrell.Lobin@ocfl.net; Hamp.Pridgen@ocfl.net
Subject: Fac Id 0950203 - Northern Star Generation Services - Orlando Cogen Plant
Attachments: Fac ID 0950203 - Compliance test Report - ltr dtd 072908-pdf.pdf

<<Fac ID 0950203 - Compliance test Report - ltr dtd 072908-pdf.pdf>>

The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>>.

Orange County EPD is issuing electronic documents for permits, notices and other correspondence, to provide greater service to the applicant and the engineering community. In addition, the original will be sent to the applicant via US mail. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Betty Hill
Air Quality Management Section
Orange County Environmental Protection Division
800 Mercy Drive, Suite 4
Orlando, FL 32808
407-836-1400



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