

RECEIVED

APR 10 2008

BUREAU OF AIR REGULATION

 **NORTHERN STAR  
GENERATION SERVICES  
COMPANY LLC**  
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](mailto:jim.murray@nsgen.com).

Sincerely,

A handwritten signature in black ink, appearing to read "James Murrery". The signature is fluid and cursive, with a long horizontal stroke at the end.

James Murrery  
Plant Manager

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



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

April 15, 2008

*SENT BY ELECTRONIC MAIL - RECEIVED RECEIPT REQUESTED*

James Murray  
Plant Manager  
Northern Star Generation Services Company, LLC  
Orlando Cogeneration Limited, L.P.  
8275 Exchange Drive  
Orlando, Florida 32809

Re: Orlando Cogeneration Limited, L.P.  
Combustion Turbine - Excess Emissions Authorization for  
Installation of Compressor Section  
Current Air Permit No. 0950203-007-AC

Dear Mr. Murray:

The Department has reviewed the request dated April 10, 2008 for excess emissions resulting from gas valve mapping, which is required by the equipment manufacturer following the installation of a new compressor section in a combustion turbine. In accordance with Rule 62-210.700(1), Florida Administrative Code (F.A.C.), the Department authorizes excess emissions due to gas valve mapping provided:

- The operator adheres to best operational practices to minimize emissions;
- The operator minimizes the duration of excess emissions, which shall not exceed 30 hours for the entire period of gas valve mapping (six hours per day for five days);
- The operator notifies the Orange County Environmental Protection Division for each day the gas valve mapping is performed; and,
- The owner or operator submits a report summarizing the hourly NO<sub>x</sub> emissions during the gas valve mapping.

The Department authorizes your request for this tuning session only. If you wish to permanently change the permit language to recognize vendor required periods of turbine tuning as allowable excess emissions, Northern Star Generation Services must submit an air construction permit application. The air construction application may be submitted and processed concurrently with the Title V renewal application, if desired.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in

the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). Petitions filed by the applicant or any of the parties listed below must be filed within 21 (twenty one) days of receipt of this notice. Petitions filed by any other person must be filed within 21 (twenty one) days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.


A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a

copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.



Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/jh/cb

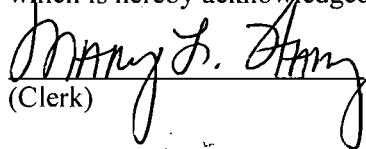
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this exemption was sent electronically (with Received Receipt Requested) and copies were sent electronically (with 4/16/08 Received Receipt Requested) before the close of business on \_\_\_\_\_ to the person(s) listed or as otherwise noted:

James Murray, NSGS ([jim.murray@nsgen.com](mailto:jim.murray@nsgen.com))  
Dave Kellermeyer, NSGS ([dave.kellermeyer@nsgen.com](mailto:dave.kellermeyer@nsgen.com))  
David Good, Orlando Cogen ([david.good@nsgen.com](mailto:david.good@nsgen.com))  
Hamp Pridgen, OCEPD ([hamp.pridgen@ocfl.net](mailto:hamp.pridgen@ocfl.net))  
John Kasper, OCEPD ([john.kasper@ocfl.net](mailto:john.kasper@ocfl.net))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT  
FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

4/16/08  
(Date)

## Harvey, Mary

---

**From:** Murray, James [jim.murray@northernstargen.com]  
**To:** Harvey, Mary  
**Sent:** Thursday, April 17, 2008 9:03 AM  
**Subject:** Read: Northern Star Generation Services Company

Your message

To: jim.murray@northernstargen.com  
Subject:

was read on 4/17/2008 9:03 AM.

## Harvey, Mary

---

**From:** Murray, James [jim.murray@northernstargen.com]  
**Sent:** Thursday, April 17, 2008 9:07 AM  
**To:** Harvey, Mary  
**Subject:** RE: Northern Star Generation Services Company

Received,  
JIM

James T Murray  
407-851-1350 ext.2022

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Thursday, April 17, 2008 8:33 AM  
**To:** Murray, James; Kellermeyer, Dave; Good, Dave  
**Subject:** FW: Northern Star Generation Services Company

*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.*

**From:** Harvey, Mary  
**Sent:** Wednesday, April 16, 2008 2:51 PM  
**To:** 'jim.murray@nsgen.com'; 'dave.kellermeyer@nsgen.com'; 'david.good@nsgen.com'; 'hamp.pridgen@ocfl.net'; 'john.kasper@ocfl.net'  
**Cc:** Branum, Corrie; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Northern Star Generation Services Company

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

4/17/2008

## Harvey, Mary

---

**From:** Good, Dave [david.good@northernstargen.com]  
**To:** Harvey, Mary  
**Sent:** Thursday, April 17, 2008 9:11 AM  
**Subject:** Read: FW: Northern Star Generation Services Company

Your message

To: david.good@northernstargen.com  
Subject:

was read on 4/17/2008 9:11 AM.



## Harvey, Mary

---

**From:** John.Kasper@ocfl.net  
**Sent:** Wednesday, April 16, 2008 4:28 PM  
**To:** Harvey, Mary  
**Subject:** RE: Northern Star Generation Services Company

Received excess emissions authorization for 0950203.

John Kasper  
OCEPD

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

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Wednesday, April 16, 2008 2:51 PM  
**To:** jim.murray@nsgen.com; dave.kellermeyer@nsgen.com; david.good@nsgen.com; Pridgen, Hamp; Kasper, John  
**Cc:** Branum, Corrie; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Northern Star Generation Services Company

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Thank you,

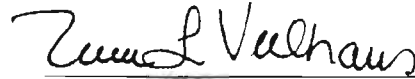
DEP, Bureau of Air Regulation

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4/16/2008

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Executed in Tallahassee, Florida.



Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/jh/cb

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- ✓ Dave Kellermeyer, NSGS ([dave.kellermeyer@nsgen.com](mailto:dave.kellermeyer@nsgen.com))
- ✓ David Good, Orlando Cogen ([david.good@nsgen.com](mailto:david.good@nsgen.com))
- ✓ Hamp Pridgen, OCEPD ([hamp.pridgen@ocfl.net](mailto:hamp.pridgen@ocfl.net))
- ✓ John Kasper, OCEPD ([john.kasper@ocfl.net](mailto:john.kasper@ocfl.net))

Clerk Stamp

**FILED AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Mary J. Stany 4/16/08  
(Clerk) (Date)