



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

July 15, 2009

Electronic Mail – Received Receipt Requested

Mr. Ralph E. Randall, Plant Manager - Hardee Power Station
Hardee Power Partners Limited
6695 North County Road 663
Bowling Green, FL 33834-6817

Re: Request for Additional Information Regarding Title V Renewal Application
File No. 0490015-010-AV
Hardee Power Station
Hardee County

Dear Mr. Randall:

On May 20, 2009 the Department received your application for a Title V air operation permit renewal for the above referenced facility. The application is incomplete as submitted. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. For Attachment E, please identify the specific equipment that you currently have on site that meets the definition of "insignificant emissions unit". Also, it is not sufficient to list items from Rule 62-210.300(3), F.A.C. that represents categorical exemptions. Rather, for each exempt category, list the equipment that you have. Note that internal combustion engines or mobile sources are "unregulated emissions units" and not "insignificant emissions units".
2. Please identify any engines that are subject to any of the following federal regulations: 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines; 40 Code of Federal Regulations (CFR) 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines, and 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. If applicable,
 - a. Please provide the following information for each emission unit subject to an applicable subpart: in-service date, cylinder displacement, and rule applicability.
 - b. Please identify the standards, operating limits, and monitoring requirements.
3. For Attachment G, please send a copy of the most recently submitted annual statement of compliance, DEP Form No. 62-213.900, F.A.C. Also, please provide more details on the current excess emissions compliance issue regarding Emissions Unit No. 005.

REQUEST FOR ADDITIONAL INFORMATION

4. Attachment H - you have requested general changes to the permit conditions. For condition A.8. please provide the latest test results showing how VOC was measured and reported. Condition B.14. specifies CEMS data exclusion of excess emissions for periods of operation including startup, shutdown and malfunction. The details of this condition and also conditions A.18. and B.26. were carefully constructed during initial issuance of that permit. Changes will likely require a concurrent air construction (AC) permit revision. Please provide a justification or clarification for each requested change and provide additional information to support your request. Permit language taken from the rule cannot be changed, such as conditions A.12. (Rule 62-297.310(2), F.A.C.), B.33. and C.17. (Rule 62-210.700, F.A.C.).
5. Is the "startup" defined in Attachment L a warm startup?
6. If you wish to make concurrent air construction permit revisions, submit the application page that requests concurrent processing of an AC permit with the Title V renewal application to make the requested changes that come from the underlying AC permit.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item numbers 1 through 6 above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to Item numbers 1 through 6 above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

If you should have any questions, please call Susan DeVore, Professional Engineer, at 850-921-8968.

Sincerely,



Susan DeVore, P.E.
Professional Engineer
Bureau of Air Regulation

JFK/scd

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Ralph E. Randall, Hardee Power Partners Limited (rrandall@inenergyllc.com)
Mr. Thomas W. Davis, P.E., Environmental Consulting & Technology, Inc. (tdavis@ectinc.com)
Ms. Cindy Zhang-Torres, P.E., DEP Southwest District Office (cindy.zhang-torres@dep.state.fl.us)

REQUEST FOR ADDITIONAL INFORMATION

Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
Ms Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Friday, Barbara

From: Friday, Barbara
Sent: Wednesday, July 15, 2009 10:33 AM
To: 'Ralph Randall'
Cc: 'Tom Davis'; Zhang-Torres; Halpin, Mike; 'Oquendo.Ana@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; Gibson, Victoria; DeVore, Susan
Subject: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Attachments: RalphRandall-RAIHardeePowerPartnersLimited,FileNo.0490015-010-AV.pdf

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.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Tracking:

Recipient

'Ralph Randall'

'Tom Davis'

Zhang-Torres

Halpin, Mike

'Oquendo.Ana@epamail.epa.gov'

'Forney.Kathleen@epamail.epa.gov'

'abrams.heather@epamail.epa.gov'

Gibson, Victoria

DeVore, Susan

Delivery

Delivered: 7/15/2009 10:33 AM

Delivered: 7/15/2009 10:33 AM

Delivered: 7/15/2009 10:33 AM

Delivered: 7/15/2009 10:33 AM

Friday, Barbara

From: System Administrator
To: Ralph Randall
Sent: Wednesday, July 15, 2009 10:33 AM
Subject: Delivered: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Your message

To: Ralph Randall
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov;
Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson,
Victoria; DeVore, Susan
Subject: Request for Additional Information-
HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Sent: 7/15/2009 10:33 AM

was delivered to the following recipient(s):

Ralph Randall on 7/15/2009 10:33 AM

Friday, Barbara

From: Randall, Ralph [RRandall@invenergyllc.com]
To: Friday, Barbara
Sent: Wednesday, July 15, 2009 2:20 PM
Subject: Read: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Your message

To: RRandall@invenergyllc.com
Subject:

was read on 7/15/2009 2:20 PM.

Friday, Barbara

From: Randall, Ralph [RRandall@invenergyllc.com]
Sent: Wednesday, July 15, 2009 2:26 PM
To: Friday, Barbara
Cc: Frank Sarduy; Powell, Dennis
Subject: RE: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

I received the notice. Thanks.

Ralph Randall
Plant Manager
Hardee Power Station
813-630-6562
rrandall@invenergyllc.com

This electronic message and all contents contain information which may be privileged, confidential or otherwise protected from disclosure. The information is intended to be for the addressee(s) only. If you are not an addressee, any disclosure, copy, distribution or use of the contents of this message is prohibited. If you have received this electronic message in error, please notify the sender by reply e-mail and destroy the original message and all copies.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Wednesday, July 15, 2009 10:33 AM
To: Randall, Ralph
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; DeVore, Susan
Subject: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Dear Sir/Madam:

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

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Friday, Barbara

From: Microsoft Exchange
Sent: Wednesday, July 15, 2009 10:34 AM
To: Friday, Barbara
Subject: Relayed: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Attachments: ATT124284.txt; ATT124284.txt

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

Tom Davis

Subject: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Tom Davis [tdavis@ectinc.com]
Sent: Wednesday, July 15, 2009 10:59 AM
To: Friday, Barbara
Subject: RE: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Barbara,

I have received and can view the document provided in your email.

Thanks.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Wednesday, July 15, 2009 10:33 AM
To: Ralph Randall
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; DeVore, Susan
Subject: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Friday, Barbara

From: System Administrator
To: Zhang-Torres; Gibson, Victoria; DeVore, Susan
Sent: Wednesday, July 15, 2009 10:33 AM
Subject: Delivered:Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Your message

To: Ralph Randall
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov;
Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson,
Victoria; DeVore, Susan
Subject: Request for Additional Information-
HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Sent: 7/15/2009 10:33 AM

was delivered to the following recipient(s):

Zhang-Torres on 7/15/2009 10:33 AM
Gibson, Victoria on 7/15/2009 10:33 AM
DeVore, Susan on 7/15/2009 10:33 AM

Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Wednesday, July 15, 2009 11:39 AM
Subject: Read: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Your message

To: Ralph Randall
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov;
Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson,
Victoria; DeVore, Susan
Subject: Request for Additional Information-
HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Sent: 7/15/2009 10:33 AM

was read on 7/15/2009 11:38 AM.

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Wednesday, July 15, 2009 10:39 AM
Subject: Read: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Your message

To: Ralph Randall
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov;
Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson,
Victoria; DeVore, Susan
Subject: Request for Additional Information-
HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Sent: 7/15/2009 10:33 AM

was read on 7/15/2009 10:39 AM.

Friday, Barbara

From: DeVore, Susan
To: Friday, Barbara
Sent: Wednesday, July 15, 2009 10:56 AM
Subject: Read: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Your message

To: Ralph Randall
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov;
Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson,
Victoria; DeVore, Susan
Subject: Request for Additional Information-
HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Sent: 7/15/2009 10:33 AM

was read on 7/15/2009 10:56 AM.

Friday, Barbara

From: System Administrator
To: Halpin, Mike
Sent: Wednesday, July 15, 2009 10:33 AM
Subject: Delivered:Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV

Your message

To: Ralph Randall
Cc: Tom Davis; Zhang-Torres; Halpin, Mike; Oquendo.Ana@epamail.epa.gov;
Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson,
Victoria; DeVore, Susan
Subject: Request for Additional Information-
HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Sent: 7/15/2009 10:33 AM

was delivered to the following recipient(s):

Halpin, Mike on 7/15/2009 10:33 AM

Friday, Barbara

From: Halpin, Mike
Sent: Wednesday, July 15, 2009 10:38 AM
To: Friday, Barbara
Subject: Delivered: Request for Additional Information-HardeePowerPartnersLtd./HardeePowerStation, File No.0490015-010-AV
Attachments: ATT124311.txt

Your message was delivered to the recipient.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Wednesday, July 15, 2009 10:33 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4A5DE897_1021_37939_6 A97BC1DC00B

<Oquendo.Ana@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4A5DE897_1021_37939_6 A97BC1DC00B

<abrams.heather@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4A5DE897_1021_37939_6 A97BC1DC00B