

**HARDEE POWER  
PARTNERS LIMITED**

Invenergy

February 6, 2007

Mr. Jeff Koerner, P.E.  
Professional Engineer Administrator  
Florida Department of Environmental Protection  
Division of Air Resource Management  
111 South Magnolia Drive, Suite 23  
Tallahassee, Florida 32301

RECEIVED

FEB 07 2007

BUREAU OF AIR REGULATION

**Re: Hardee Power Partners  
Hardee Power Station  
Title V Air Operation FINAL Permit No.: 0490015-007-AV  
Air Construction Permit PSD-FL-140  
Request for Permit Revision, CT-2B Heat Input**

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Dear Mr. Koerner:

Hardee Power Partners (HPP) owns the Hardee Power Station, located approximately 9 miles northwest of the City of Wauchula in Hardee County, Florida. The Hardee Power Station is comprised of a combined-cycle unit consisting of two General Electric (GE) 7EA combustion turbine generators (CT-1A and CT-1B), and two simple-cycle GE 7EA combustion turbine generators (CT-2A and CT-2B).

The Department issued Air Construction Permit No. PSD-FL-140 on October 8, 1999 authorizing construction and initial operation of CT-2B. Title V Air Operation Permit Renewal FINAL Permit No.: 0490015-007-AV was last revised on December 13, 2006, authorizing continuing operation of the Hardee Power Station. The purpose of this letter is to request a concurrent revision to these two permits to allow for an increase in permitted capacity for Combustion Turbine 2B (CT-2B).

When firing natural gas, Section III, Condition B.1. of FINAL Permit No.: 0490015-007-AV limits the simple cycle GE 7EA CT-2B gas turbine heat input to 880 million British thermal units per hour on a lower heating value basis (mmBtu/hr, LHV) at a compressor inlet temperature of 59°F, relative humidity of 60 percent, ambient air pressure of 14.7 pounds per square inch (psia), and full load operation. During oil firing, the CT-2B heat input is limited to 950 mmBtu/hr, LHV under the same operating conditions. The corresponding heat input limitations are contained in Specific Condition No. 3 of Air Construction Permit No. PSD-FL-140. Operational data for CT-2B indicates that these maximum heat inputs, which were based on gas turbine vendor projections, underestimate the actual performance of the CT-2B gas turbine by approximately 10% percent.

Accordingly, HPP requests revisions to FINAL Permit No.: 0490015-007-AV, Condition B.1. and

Air Construction Permit No. PSD-FL-140, Specific Condition No. 3 to allow maximum heat inputs of 950 and 1060 mmBtu/hr, LHV for gas and oil firing, respectively, at a compressor inlet temperature of 59°F, relative humidity of 60 percent, ambient air pressure of 14.7 psia, and full load operation. HPP does not request any other revisions to FINAL Permit No.: 0490015-007-AV or Air Construction Permit No. PSD-FL-140. CT-2B will continue to comply with all of the current emission limitations and standards specified by FINAL Permit No.: 0490015-007-AV.

In support of this Title V permit revision request, a completed Application for Air Permit - Long Form (Facility Information section only, including Responsible Official and Professional Engineer certifications) is enclosed.

Please feel free to contact Frank Sarduy at (813) 314-2459 if you have any questions regarding this permit revision request.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex C. George", with a horizontal line extending to the right from the end of the signature.

Alex C. George  
Vice President

Enclosure