

**HARDEE POWER
PARTNERS LIMITED**

Invenergy

Via Federal Express and E-mail 7715 9606 7219

October 23, 2014

Mr. Jonathan Holtom
Florida Department of Environmental Protection
2600 Blair Stone Road
MS #5505
Tallahassee, FL 32399-2400

RECEIVED

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DIVISION OF AIR
RESOURCE MANAGEMENT

Re: Hardee Power Partners Limited
Hardee Power Station
Comments on Title V Draft/Proposed Permit No. 0490015-017-AV

Dear Mr. Holtom:

Hardee Power Partners Limited (Hardee) hereby submits comments concerning the above-referenced draft/proposed Title V permit, which is currently in the 30-day public notice period. As our consultant, Mr. Frank Sarduy of Southshore Environmental, recently communicated with you, it appears that inaccurate language made its way into 0490015-012-AC/PSD-FL-140C, and is now being incorporated into the second paragraph of Section III., Subsection A and Condition A.3 of 0490015-017-AV. This has resulted in lowering the maximum sulfur content of No. 2 fuel oil for combustion turbines CT-1A, -1B, and -2A (Emission Units 001, 002, and 003, respectively) from 0.5% by weight, with a maximum annual average of 0.3% by weight, to 0.05% by weight.

Hardee's review of historical records has concluded that the above change was discussed by HPP, its consultants, and the FDEP in 2009 as part of negotiations centered on emissions testing parameters, specifically particulate matter (PM) testing, but Hardee ultimately opted to keep the PM testing requirement, rather than lowering the fuel sulfur content limit. Therefore, Hardee respectfully requests that the language in 0490015-017-AV be revised to incorporate the previous sulfur limits, and that the corresponding corrections also be made to the underlying PSD permit language.

We appreciate your consideration of these comments. If you have questions or need additional information, please feel free to contact me at rrandall@invenergyllc.com, or Sheldron Johnson at (863) 375-3266, extension 227.

Sincerely,



Ralph E. Randall
Regional Plant Director