

Orlando Cogen Limited, L.P.
operated by
Air Products and Chemicals, Inc.
8275 Exchange Drive
Orlando, FL 32809

Telephone (407) 851-1350
Facsimile (407) 851-1686



RECEIVED

MAY 07 1998

BUREAU OF
AIR REGULATION

May 4, 1998

Mr. C. H. Fancy
Chief
Bureau of Air Regulations
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Public Notice of Intent to Issue Title V Permit
Title V Permit No: 0950202-001-AV
Orlando CoGen Limited, L.P.

Dear Mr. Fancy:

Orlando CoGen Limited had the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" published in The Orlando Sentinel on Tuesday, April 21, 1998. Attached is the original copy of the proof of publication affidavit from The Orlando Sentinel. You should have received the faxed copy on April 28th.

Sincerely,

A handwritten signature in cursive script that reads "Larry Adkins". The signature is written in black ink and is positioned above the printed name.

Larry Adkins
Plant Manager
Orlando CoGen Limited, L.P.

5/7/98 cc: Lennon Anderson

State of Florida } S.S.
COUNTY OF ORANGE

Before the undersigned authority personally appeared Donna Shaver

who on oath says that he/she is the Legal Advertising Representative of The Orlando Sentinel, a daily newspaper published at ORLANDO in ORANGE County, Florida; that the attached copy of advertisement, being a PUBLIC NOTICE OF in the matter of ORLANDO COGEN Limited, L.P. in the ORANGE Court, was published in said newspaper in the issue; of 04/21/98

Affiant further says that the said Orlando Sentinel is a newspaper published at ORLANDO in said ORANGE County, Florida, and that the said newspaper has heretofore been continuously published in said ORANGE County, Florida, each Week Day and has been entered as second-class mail matter at the post office in ORLANDO in said ORANGE County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Donna Shaver

The foregoing instrument was acknowledged before me this 23rd day of April, 1998, by Donna Shaver who is personally known to me and who did take an oath.

(SEAL)

JULIA NICHOLS My Comm. Exp. 9/23/2001
Notary Public in and for the State of Florida No. 153016
[] Personally Known [] Other I.D.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Title V DRAFT Permit No. 0650203-001-AV
Orlando CoGen Limited, L.P.
Orange County, Florida
The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Orlando CoGen Limited, L.P. for the Orlando CoGen Limited, L.P. Facility located at 8275 Exchange Drive, Orlando, Orange County, Florida. The applicant's name and address are: Orlando CoGen Limited, L.P., 8275 Exchange Drive, Orlando, FL 32809.
The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.
The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 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 agency action 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) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. 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 for a request for mediation, as discussed below, within the applicable time for that constitutes a waiver of that person's right to request an administrative hearing. 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 28-5.207 of the Florida Administrative Code. A petition must contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the County in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by the petitioner, if any;
(e) A statement of the facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement identifying the rules or statutes that the petitioner believes require reversal or modification of the Department's action or proposed action; and
(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice.
Because the administrative hearing process is designed to formulate the final agency action, the filing of a petition for mediation does not constitute a final action and may be different from the action taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.
In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 1651(d)(2), any person may petition the Administrator of the EPA within (ten) (10) days of the date of publication of the Administrator's 45 (forty-five) day review of the application as required by U.S.C. Section 1651(d)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the entry into effect of any permit, nor does it stay the Administrator's action pursuant to 42 U.S.C. Section 1651(d)(2). For more information, contact the Administrator of the EPA at 401 M Street, SW

Washington, D.C. 20460
A complete project file is available for public inspection during normal business hours: 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Permitting Authority: Department of Environmental Protection, Bureau of Air Regulation, 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301.
Tel: 904/498-1344 Fax: 904/498-1344
Affected District/Local Program: Central District, 3319 Maguire Boulevard, Suite 232, Orlando, FL 32803-3767.
Tel: 407/854-7555 Fax: 407/851-2966
This public notice file includes the DRAFT Permit application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplek, P.E. at the above address, or call 850/468-1344, for additional information.
C042079426 03 Apr 21, 1998

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MAY 07 1998
BUREAU OF AIR REGULATION

Orlando Cogen Limited, L.P.
operated by
Air Products and Chemicals, Inc.
8275 Exchange Drive
Orlando, FL 32809

Telephone (407) 851-1350
Facsimile (407) 851-1686



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APR 28 1998

BUREAU OF
AIR REGULATION

April 27, 1998

Mr. C. H. Fancy
Chief
Bureau of Air Regulations
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Public Notice of Intent to Issue Title V Permit
Title V Permit No: 0950202-001-AV
Orlando CoGen Limited, L.P.

Dear Mr. Fancy:

Orlando CoGen Limited had the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" published in The Orlando Sentinel on Tuesday, April 21, 1998. Attached is a faxed copy of the proof of publication affidavit from The Orlando Sentinel. I will forward an original to you as soon as I receive it.

Sincerely,

A handwritten signature in cursive script that reads "Larry Adkins". The signature is written in black ink and is followed by a horizontal line.

Larry Adkins
Plant Manager
Orlando CoGen Limited, L.P.

4/28/98 cc: Lennon Anderson

The Orlando Sentinel

Published Daily

State of Florida } S.S.
COUNTY OF ORANGE

OPERATION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
Title V DRAFT Permit No.
0950203-001-AV
Orlando CoGen Limited, L.P.
Orange County

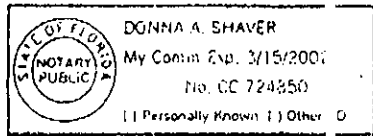
Before the undersigned authority personally appeared Julia Nichols, who on oath says that he/she is the Legal Advertising Representative of The Orlando Sentinel, a daily newspaper published at Orlando in Orange County, Florida; that the attached copy of advertisement, being a Public Notice in the matter of Permit #0950203-001-AV in the Orange Court, was published in said newspaper in the issue of 4/21/98

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Florida, each Week Day and has been entered as second-class mail matter at the post office in Orlando in said Orange County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

The foregoing instrument was acknowledged before me this 27th day of April, 1998, by Julia Nichols, who is personally known to me and who did take an oath.

[Signature]
[Signature]

(SEAL)



RECEIVED

APR 28 1998

BUREAU OF
AIR REGULATION

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Orlando CoGen Limited, L.P. for the Orlando CoGen Limited, L.P. Facility located at 8275 Exchange Drive, Orlando, Orange County. The applicant's name and address are: Orlando CoGen Limited, L.P. 8275 Exchange Drive, Orlando, FL 32809.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #3505, Tallahassee, Florida 32309-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.669 and 120.67 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 agency action may petition for an administrative hearing in accordance with sections 120.589 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 36, Tallahassee, Florida 32309-3000. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. 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 (or a request for mediation, as discussed below), within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.589 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 28-5.207 of the Florida Administrative Code. A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the country in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action.

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



April 9, 1997

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
APR 11 1997
BUREAU OF
AIR REGULATION

Re: Request for Additional Information Regarding Initial Title V Application
File No. 0950203-001-AV
Orlando CoGen Limited, Orange County

ATTN: Title V Section- Scott M. Sheplak, P.E. Administrator

Dear Mr. Sheplak:

On behalf of Orlando CoGen Limited, L.P., this correspondence and attachments provides the information requested in your January 14, 1997 letter regarding the initial Title V permit application for the above-referenced facility. The information provided below is presented in the same order as requested in your letter.

Facility Information

1. Standard Industrial Classification (SIC) code -- The appropriate four-digit SIC code for the facility is 4931 as listed in the construction permit (AC48-206720). The facility operates as a co-generation plant and provides less than 95 percent of energy output as electricity. This has been confirmed for 1996, where 94.6 percent of the energy output was supplied as electricity. Thus, the appropriate four-digit code is 4931. This correction has been made to the Title V application form and is attached.
2. Synthetic Minor Source of Pollutants Other than HAPs -- The facility that includes the combustion turbine and duct burner system is not synthetically limited in the amount of NO_x or CO emissions that would otherwise classify the facility as a "minor" source. However, the duct burner has a federally enforceable limitation on the total fuel usage (i.e., Specific Condition 3 of the construction permit) that limits the potential to emit for NO_x and CO. The maximum fuel usage of 450,000 million (MM)Btu/year [low heating value (LHV)] represents 3,688.525 hours of operation per year at the maximum heat input of 122 MMBtu/hr; however, the hours per year are not limited. As a result, Field 5 under Facility Regulatory Classification was checked as "No," while Fields 4 under Section H was checked "Yes."

Combustion Turbine (Emission Unit #1)

3. Turbine Wash -- The intake compressor is cleaned while the turbine is operated (i.e., on-line) at a dilution ratio of 9 gallons of cleaner to 35 gallons of demineralized water (i.e., about 20.5 percent cleaner). The cleaner currently used is Turbotech 927, which is a solvent and surfactant based

mixture that contains no hazardous air pollutants as defined in Rule 62-210.200(145)(a), Florida Administrative Code (F.A.C.). An MSDS sheet is attached. The on-line compressor cleaning results in the decomposition of the solvents and surfactants to carbon dioxide and water due to the high temperatures in the combustion zone of the turbine. The on-line compressor cleaning is performed approximately once every 4 days. This frequency results in the use of about 821 gallons of cleaner per year.

4. Segment (Process/Fuel) Information -- The 0.987 MMcf/hr of gas represents the maximum heat input at 20°F inlet turbine temperature. Since a turbine's output is inversely proportional to turbine inlet temperature, the maximum heat input occurs at the lowest temperature. However, ISO conditions (59°F and 60 percent relative humidity) is the common benchmark for turbine performance, the basis of the New Source Performance Standards (NSPS) for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) and the basis of the construction permit limits. A performance summary from 20°F to 102°F was included in the construction permit application. Attachment OR-E01-L12 includes a table from the original application that lists engine performance characteristics including fuel usage (see attached). The maximum heat input of 0.987 MMcf/hr was used to calculate a maximum annual usage at 20°F, a condition unlikely in Florida. The actual permit limit is based on ISO conditions and limits the heat input to 856.9 MMBtu/hr; this is equivalent to 0.9058 MMcf/hr and 7,935 MMcf/year. It should be noted that there is no inherent fuel usage limit for the gas turbine in the construction permit.
5. Million Btu per SCC Unit -- The 946 MMBtu/MMcf (i.e., 946 Btu/cf) represents the lower heating value (LHV) of the natural gas. This heating value was the basis of the construction permit application as listed on Page 5 of 12 of the application form (see attached).
6. Emission Unit Pollutant Detail Information SO₂ -- The 2.82 lb/hr was based on a maximum sulfur content of 1 grain/100 cf of natural gas. This is based on an evaluation of sulfur contents of natural gas received in Florida over the last 6 to 7 years. The calculation was provided in Field 8 of the Title V application (see attached page). The reference to "165" may be an error in the database and the calculation may have been inadvertently changed in the database at some point.
7. Emission Unit Pollutant Detail Information PM -- The calculation presented in Field 8 using the 934 MMBtu/hr was based on the 20°F operating condition. Because 9 lb/hr and 36.4 ton/year is based on a federally enforceable construction limit (Specific Condition 4 of the construction permit) and the "0" was checked in Field 7, the calculation shown was not necessary. Moreover, using the ISO heat input of 856.9 MMBtu/hr produces the same emissions rate when rounded-off. Since there may be confusion, this page was revised to include both calculations (see attached).

Duct Burner System (Emission Unit #2)

8. Segment (Process/Fuel) Information -- The Maximum Annual Rate listed in Field 5 should be 450,000 as provided for in Specific Condition 3 of the construction permit application. This page of the application form has been corrected and is attached.

Mr. Clair H. Fancy, P.E.

Page 3

April 9, 1997

Miscellaneous

9. Trivial and Unregulated Sources -- The original EPA trivial activities list and the trivial activities list originally developed by the Department included freshwater cooling towers. Since the final EPA trivial list does not include cooling towers, the cooling towers are being requested to be classified as an exempt emission unit by Rule 62-213.430(6) F.A.C. Attachment OR-E03-B6 has been corrected. The maximum potential emission for the cooling towers are 2.741 tons/year of PM/PM10. The calculation is as follows:

2,500 milligram/liter (mg/L) maximum total dissolved solids
25,000 gallons/minute circulating water rate
0.002% of circulating water rate drift; 0.00002 of circulating water rate

$2,500 \text{ mg/L} \times 3.785 \text{ L/gallon} \times \frac{1 \text{ g}}{1,000 \text{ mg}} \times \frac{1 \text{ lb}}{453.6 \text{ g}} \times 25,000 \text{ gal/min} \times 0.00002 \times 60 \text{ min/hr} = 0.626 \text{ lb/hr or } 2.741 \text{ tons/year}$

10. Trivial and Unregulated Sources -- The emergency generator is a 150 kW unit fired with natural gas at a rate of 37 cf/min. Currently, the unit is tested quarterly for about 30 minutes and during planned outages for about 1 hour as a full-load test. At other times, the emergency generator is only used when electric power is lost from both the plant and the interconnection with Florida Power Corporation. This unit should be classified as an unregulated unit and would be operated under the general exemption in Rule 62-210.300(3)(a)20. F.A.C. of 4.4 MMcf/year of natural gas.

Also attached is the certification pages for the Responsible Official and Professional Engineer that was requested with this information. Please call if you have any further questions.

Sincerely,



Kennard F. Kosky, P.E.
Principal

KFK/lcb

cc: Larry Adkins, Orlando CoGen Limited, L.P.
Tom Hess, Orlando CoGen Limited, L.P.
File (2)

14434Y/F1/WP/07