



8275 Exchange Drive
Orlando, FL 32809

25 February 2013

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DIVISION OF AIR
RESOURCE MANAGEMENT

Florida Department of Environmental Protection
Division of Air Resource Management, MS5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Phone: (850) 921-9504

Re: Orlando CoGen Limited, L.P.
Facility ID: 0950203; ORIS Code: 54466; Title V Permit: 0950203-010-AV
CO/NOx Emissions Report - 2012

To Whom It May Concern:

Per the requirements of Condition C.26. of Permit 0950203-010-AV, Orlando CoGen Limited, L.P. hereby submits the fifth of the required five year annual report.

If you have any questions regarding this submittal, please contact me at (407) 851-1350 or [jim.murray@nsgen.com].

Thank you.

Sincerely,

James Murray, Plant Manager
Orlando CoGen Limited, L.P.

Attachment

Cc: David Kellermeyer, NSGS
OCL File

Annual Report
CY2012 CO and NOx Emissions Demonstration
Permit No. 0950203-010-AV
Northern Star Generation Services
Orlando CoGen Limited, L.P.

Orlando Cogen Limited, L.P. was issued a Final Permit Project No.: 0950203-007-AC by the Florida Department of Environmental Protection, Division of Air Resources Management, Bureau of Air Regulation, Title V section. The permit authorized Orlando Cogen to install a gas turbine upgrade to improve the thermal efficiency of the unit. This permit was incorporated into a renewal of Title V Air Operation Permit No. 0950203-009-AV with an effective date of January 1, 2009. Facility identification information is shown on Table 1.

Table 1
Facility Identification Information

1. Facility Owner/Company Name: Northern Star Generation Services	
2. Site Name: Orlando CoGen Limited, L.P.	3. County: Orange County
4. Title V Air Operation Permit No./ Facility ID No.: Title V Air Operation Permit No.: 0950203-010-AV Facility ID No.: 0950203	
5. Name of Person to Contact: (if there are any questions about the information provided) Mr. David Kellermeyer	6. Contact's Telephone No.: (713) 580-6368

Permit Condition C.26 of the Title V Air Operation Permit, "CO/NOx Emissions Reports," requires that for a period of five years following completion of the gas turbine upgrade authorized in Permit No. 0950203-007-AC, Orlando Cogen must submit an annual report demonstrating that the project did not result in a significant increase in CO and NOx emissions. The permit established baseline emissions for operation prior to the project at 3 tons per year of CO and 233 Tons per year of NOx.

The plant is permitted to emit emissions at rates such that the plant is considered a major source of emissions under the Prevention of Significant Deterioration (PSD) rules. Once considered a major source, an emissions increase is considered significant if it exceeds the significance level for a regulated air contaminant as defined in the PSD rules. For CO and NOx, the significance levels are 100 tons per year and 40 tons per year, respectively. The increase in emissions is based on the difference in actual emissions for the current year (2012) and the established baseline emissions.

An Annual Operating Report (AOR) has been completed based on actual emissions for the plant for the calendar year 2012. Table 2 is a comparison of the actual emissions for calendar year 2012, as reported in the AOR, to the baseline emissions, as defined in the permit, for CO and NO_x.

Table 2
Comparison of 2012 Annual Emissions to Baseline Emissions
(tons per year)

Air Contaminant	Baseline Emissions	2012 Actual Total Emissions*	Net Emissions Change	Significance Level	Permitted Allowable (Total)
CO	3	5.35	+2.35	100	114.6
NO _x	233	185.11	(-47.89)	40	273.9

* Ref: For details with regard to the estimation of annual emissions, please see the AOR for CY2012.

As shown on Table 2, the change in actual emissions from the plant compared to the baseline emissions did not equal or exceed the significance levels as defined in the PSD rules. In addition, the 2012 actual emissions are less than the combined emissions limitations for the combustion turbine/duct burner system as established in the permit. Therefore, the gas turbine upgrade did not result in a significant increase in CO and NO_x emissions for calendar year 2012.