

# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

August 25, 2003

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Donald K. Day, Plant Manager  
Orlando CoGen Limited, L.P.  
8275 Exchange Drive  
Orlando, Florida 32809-7651

Re: Request for Additional Information Regarding Title V Permit Renewal Application  
File No.: 0950203-002-AV


Dear Mr. Day:

The Title V permit renewal application for the Orlando CoGen Facility was received in a timely manner (July 1, 2003). However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The Acid Rain application that was submitted with the Title V renewal application was not a current application. The Acid Rain application must be recertified and resubmitted with each Title V renewal. Please recertify and resubmit using the latest Acid Rain form (form 62-210.900(1)(a), F.A.C., dated 6/16/03).
2. The attachment "DOC.II.C.14., Item 2, Proposed Schedule for the Submissions of Periodic Compliance Statements Throughout the Permit Term" contains a statement that compliance statements will be submitted by March 1<sup>st</sup> of each year consistent with 40 CFR 72.90. It should be noted that this rule does not contain the specific date of March 1<sup>st</sup>. Instead, it requires compliance statements to be submitted within 60-days after the end of the calendar year. Please correct this document and resubmit.

The above comments require a written response to the Department within ninety days of receipt of this notice unless additional time is requested pursuant to Rule 62-213.420(1)(b)6., F.A.C. Please note that the Department appreciates the suggested changes contained in the proposed permit that was submitted with your renewal application and will make an attempt to include them in the renewal permit. However, not all of the suggested changes are appropriate, considering Title V permitting requirements and standard permitting formats, and may not be reflected in the DRAFT permit renewal. If you should have any questions, please contact Jonathan Holtom, P.E., at (850) 921-9531, or me at (850) 921-9532.

Sincerely,

  
Scott M. Sheplak, P.E.  
Administrator  
Title V Section

SMS/jh

CC: Mr. Thomas Davis, P.E., ECT, Inc.  
Ms. Jennifer Mollhagen, El Paso Merchant Energy Company  
Mr. Len Kozlov, DEP, Central District Office  
"More Protection, Less Process"

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Mr. Donald K. Day, Plant Manager  
 Orlando CoGen Limited, L.P.  
 8275 Exchange Drive  
 Orlando, Florida 32809-7651

2. Article Number  
 (Transfer from service label) 7001 1140 0002 1577 9175

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *Donald K. Day*  Agent  Addressee  
 B. Received by (Printed Name) *Donald K. Day* C. Date of Delivery *8-18-03*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
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 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

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**OFFICIAL USE**  
 Mr. Donald K. Day, Plant Manager

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**Sent To**  
 Mr. Donald K. Day, Plant Manager  
 Street, Apt. No.;  
 Box No. 8275 Exchange Drive  
 City, State, ZIP+ 4 Orlando, Florida 32809-7651

PS Form 3800, January 2001

See Reverse for Instructions