
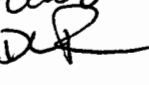


Florida Department of  
Environmental Protection

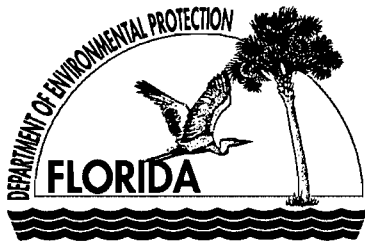
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Memorandum

TO: Trina Vielhauer  
THROUGH: Al Linero   
FROM: David Read   
DATE: March 30, 2011  
SUBJECT: Authorization Letter for Excess NO<sub>x</sub> Emissions During Gas Mapping Curves Update  
Project No. 0950203-010-AC  
Orlando CoGen Limited, LP.  
Alstom Combustion Turbine (CT) Model GT 11NMC  
Combined Cycle CT Emission Unit (EU-001)

Attached for your review is a letter authorizing excess NO<sub>x</sub> emissions at the Orlando CoGen Limited, LP plant while conducting a gas mapping curves update during a planned 3 year maintenance cycle scheduled for April 12, 2011. This mapping is recommended by Alstom the manufacturer of the CT. I recommend your approval and signature of the attached authorization letter.

Attachments



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

March 31, 2011

*Sent by Electronic Mail – Received Receipt Requested*

James Murray, Plant Manager  
Orlando CoGen Limited, LP.  
8275 Exchange Drive  
Orlando, Florida 32809

Re: Update Gas Mapping Curves – Alstom Combustion Turbine (CT) Model GT 11NMC  
Project No. 0950203-010-AC  
Combined Cycle CT Emission Unit (EU) 001 – Excess Emissions Authorization

Dear Mr. Murray:

The Department has reviewed your request that was received on March 23, 2011, to allow excess emissions for EU-001 during the updating of gas mapping curves by Alstom. EU-001 consists of an Alstom Model GT 11NMC combined cycle CT. The gas mapping will occur during the current 3 year maintenance cycle at the plant. The curve mapping will result in multiple stops and starts and extended periods of low load runs. This could result in NO<sub>x</sub> emissions exceeding the two hour excess emission limit given in **Specific Condition III.C.8** of the plants Title V Operation Permit No. 0950203-009-AV. The projected start date of the 3 year maintenance cycle at the plant is April 12, 2011.

The Department authorizes excess NO<sub>x</sub> emissions while updating of the gas mapping curves by Alstom of the combined cycle CT Model GT 11NMC provided:

- The operator adheres to best operational practices to minimize emissions;
- The operator minimizes the duration of excess emissions, which shall not exceed 6 hours for any 24 hour period over a 5 day period beginning with the start of CT testing;
- The operator notifies the Orange County Environmental Protection Division within one (1) hour of the start up of the CT for the mapping update; and,
- The owner or operator submits a report summarizing the hourly NO<sub>x</sub> emissions during the CT testing.

Nothing in this action waves any federal requirements of the applicable New Source Performance Standards (NSPS) for this unit. The EU is subject to NSPS 40 CFR 60, Subpart KKKK—Standards of Performance for Stationary Combustion Turbines. The requirements of this subpart dealing with excess emissions of NO<sub>x</sub> must still be met. In particular, § 60.4350 dealing with using data from the continuous emission monitoring equipment to identify excess emissions and

60.4380 dealing with how excess NO<sub>x</sub> emissions and monitor downtime are defined shall be followed.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, of the Florida Statutes (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 decision 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, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. 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 within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under 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 28-106.205, Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure,

Mr. James Murray  
March 31, 2011  
Update Gas Mapping Curves – Alstom CT  
Page 3 of 3

with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

TLV/aal/dlr

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this authorization was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 3/31/11 to the persons listed below.

Ms. Jodi Dittell, OC EPC: [Jodi.Dittell@ocfl.net](mailto:Jodi.Dittell@ocfl.net)

Mr. David Good, Orlando CoGen: [david.good@northernstargen.com](mailto:david.good@northernstargen.com)

Mr. David Kellermeyer, NSGS: [david.kellermeyer@northernstargen.com](mailto:david.kellermeyer@northernstargen.com)

Ms. Caroline Shine, DEP Central District Office: [caroline.shine@dep.state.fl.us](mailto:caroline.shine@dep.state.fl.us)

Ms. Vickie Gibson, DEP BAR Reading File: [victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

3/31/11  
(Date)

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Thursday, March 31, 2011 9:43 AM  
**To:** 'jim.murray@northernstargen.com'  
**Cc:** 'jodi.dittell@ocfl.net'; 'david.good@northernstargen.com';  
'david.kellermeyer@northernstargen.com'; Shine, Caroline; Gibson, Victoria; Linero, Alvaro;  
Walker, Elizabeth (AIR)  
**Subject:** Orlando CoGen Limited, L.P.; 0950203-010-AC - Authorization  
**Attachments:** 0950203-010-AC\_Authorization Letter.pdf

Tracking:	Recipient	Delivery
	'jim.murray@northernstargen.com'	
	'jodi.dittell@ocfl.net'	
	'david.good@northernstargen.com'	
	'david.kellermeyer@northernstargen.com'	
	Shine, Caroline	Delivered: 3/31/2011 9:43 AM
	Gibson, Victoria	Delivered: 3/31/2011 9:43 AM
	Linero, Alvaro	Delivered: 3/31/2011 9:43 AM
	Walker, Elizabeth (AIR)	Delivered: 3/31/2011 9:43 AM

Dear Sir/ Madam:

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**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0950203.010.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950203.010.AC.F_pdf.zip)

**Owner/Company Name:** ORLANDO COGEN LIMITED, L.P.

**Facility Name:** ORLANDO COGEN LIMITED, L.P.

**Project Number:** 0950203-010-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**Facility County:** ORANGE

**Processor:** Al Linero

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Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems

## Livingston, Sylvania

---

**From:** Livingston, Sylvania  
**Sent:** Thursday, March 31, 2011 10:03 AM  
**To:** 'dave.kellermeyer@northernstargen.com'  
**Subject:** Orlando CoGen Limited, L.P.; 0950203-010-AC - Authorization  
**Attachments:** 0950203-010-AC\_Authorization Letter.pdf

Dear Sir/ Madam:

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0950203.010.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950203.010.AC.F_pdf.zip)

**Owner/Company Name:** ORLANDO COGEN LIMITED, L.P.

**Facility Name:** ORLANDO COGEN LIMITED, L.P.

**Project Number:** 0950203-010-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**Facility County:** ORANGE

**Processor:** Al Linero

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Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (new)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

## Livingston, Sylvia

---

**From:** Murray, James [jim.murray@northernstargen.com]  
**Sent:** Thursday, March 31, 2011 11:45 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: Orlando CoGen Limited, L.P.; 0950203-010-AC - Authorization

Received and viewed, Thanks  
JIM

James T Murray  
407-851-1350 ext. 2022

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Thursday, March 31, 2011 9:43 AM  
**To:** Murray, James  
**Cc:** jodi.dittell@ocfl.net; Good, Dave; david.kellermeyer@northernstargen.com; Shine, Caroline; Gibson, Victoria; Linero, Alvaro; Walker, Elizabeth (AIR)  
**Subject:** Orlando CoGen Limited, L.P.; 0950203-010-AC - Authorization

Dear Sir/ Madam:

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**Owner/Company Name:** ORLANDO COGEN LIMITED, L.P.  
**Facility Name:** ORLANDO COGEN LIMITED, L.P.  
**Project Number:** 0950203-010-AC  
**Permit Status:** FINAL  
**Permit Activity:** CONSTRUCTION  
**Facility County:** ORANGE  
**Processor:** Al Linero

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## Livingston, Sylvania

---

**From:** Livingston, Sylvania  
**Sent:** Thursday, March 31, 2011 9:58 AM  
**To:** Ilka.Bundy@ocfl.net  
**Subject:** Orlando CoGen Limited, L.P.; 0950203-010-AC - Authorization  
**Attachments:** 0950203-010-AC\_Authorization Letter.pdf

Dear Sir/ Madam:

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**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0950203.010.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0950203.010.AC.F_pdf.zip)

**Owner/Company Name:** ORLANDO COGEN LIMITED, L.P.

**Facility Name:** ORLANDO COGEN LIMITED, L.P.

**Project Number:** 0950203-010-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION

**Facility County:** ORANGE

**Processor:** Al Linero

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Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (new)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .





*All - Your Log*

Orlando Cogen Limited, L.P.  
8275 Exchange Drive  
Orlando, FL 32809

RECEIVED

MAR 23 2011

BUREAU OF  
AIR REGULATION

March 22, 2011

Ms. Trina Vielhauer  
Bureau Chief  
Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 32399-2400

Subject: Orlando CoGen Limited, L.P.  
Facility ID: 0950203; ORIS Code: 54466; Air Permit No: 0950203-009-AV  
Request for Extension of Two Hour Limit for Excess Emissions during Startup  
*0950203-010-AC*

Dear Ms. Vielhauer:

This letter is to formally request that Orlando CoGen Limited, L.P. (the Facility) be granted a waiver from Section III. C.8 which allows excess emissions from the Facility during startup to occur no more than two hours in any 24 hour period unless specifically authorized by the Department for a longer duration.

The Facility is currently in a 3 year maintenance cycle outage with a projected start up on April 12, 2011. During this outage the Facility's gas turbine manufacturer (Alstom) will be implementing some updated gas valve mapping curves.

It is anticipated that multiple starts and stops and extended periods of low load runs will be required to complete this process. This could result in the Facility exceeding the two hour startup limitation referenced above for NOx emissions, which are continuously monitored using a CEMS. Therefore the Facility formally requests that the Facility be authorized for excess emissions of up to six (6) hours during a 24 hour period over a five (5) day period beginning with the start of the combustion turbine testing.

During the period of testing the Facility will utilize the best operational practices to minimize excess emissions and to limit the duration of such excess emissions. The Facility will also notify Orange County Environmental Protection Division OCEPD one (1) hour prior to the planned startup of the combustion turbine. If requested by the Department or OCEPD, the Facility will provide a written report summarizing the NOx emissions during commissioning.

If there are any questions regarding this submittal, please do not hesitate to contact me at 407-851-1350 or via e-mail at jim.murray@nsgen.com.

Sincerely,

James Murray  
Plant Manager

Cc: Jodi Dittell, Orange County Environmental Protection Division  
David Good, Orlando Cogen  
Dave Kellermeyer, NSGS