Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

November 19, 2007

Electronic Mail – Received Receipt Requested.
jim.murray@northernstargen.com
Mr. Jim Murray, Plant Manager
Northern Star Generation Services
Orlando Cogen, LLP
8275 Exchange Drive
Orlando, Florida 32809

Re: Air Construction Permit No. 0950203-007-AC
Orlando Cogen Plant
Combustion Turbine Upgrade Project

Dear Mr. Murray:

On August 21, 2007, the Department received your request for an air construction permit to replace the rotor (power) section and upgrade the Alstom combustion turbine from a Model 11NM to a model GT 11 NMC through replacement of certain components in the compressor section with improved parts.

The enclosed "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area.

If you have any questions, please contact the Project Engineer, David Read at 850/414-7268.

Sincerely,

Trina L Vielhauer

Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/aal/dr

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:

Northern Star Generation Services on behalf of
Orlando Cogen Limited L.P.
8275 Exchange Drive
Orlando, Florida 32809

Authorized Representative:
Mr. Jim Murray, Plant Manager

Air Permit No. 0950203-007-AC
Facility ID No. 0950203
Orlando Cogen Plant
Combustion Turbine Upgrade
Orange County, Florida

Facility Location: Northern Star Generation Services operates the Orlando Cogen Plant for Orlando Cogen Limited, L.P. The plant is located in at 8275 Exchange Drive, Orlando in Orange County, Florida.

Project: The existing facility consists of a natural gas-fired combined cycle unit. The combined cycle unit includes: combustion turbine-electrical generator (CT); a heat recovery steam generator with a natural gas-fired duct burner system; and a steam turbine-electrical generator.

The permittee has submitted a permit application to replace the rotor (power) section of the CT and to physically upgrade it from an Alstom Model GT 11NM to a Model GT 11NMC by replacement of key components in the compressor section of the CT with improved ones.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station (MS) #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the Draft Permit by visiting the following website: http://www.dep.state.fl.us/air/eproducts/ards and entering the permit number indicated above. A copy of the complete project file is also available at the Air Resources Section of the Department's Central District Office at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. The telephone number is 407/894-7555.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comments received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where

the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 921-9533). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final construction permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

Comments: The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of the Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the draft permit and require, if applicable, another Public Notice.

Petitions: The Department will issue the construction 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., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 14 days of publication of the public notice or within 14 days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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 petitioner received notice of the agency decision; (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specified rules or statutes; 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 Department'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.

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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice, Technical Evaluation, and the Draft permit) and all copies were sent electronically (with Received Receipt) before the close of business on **November 19, 2007** to the persons listed:

Mr. Jim Murray, Northern Star: jim.murray@northernstargen.com
Mr. Dave Kellermeyer, Northern Star: davekellermeyer@northernstargen.com
Mr. Scott Osbourn, P.E., Golder Associates: sosbourn@golder.com
Jim Bradner, DEP CD: james.bradner@dep.state.fl.us
Lori Cunniff, Orange County EPD: lori.cunniff@ocfl.net
Jim Little, EPA Region 4: little.james@epamail.epa.gov
Katy Forney, EPA Region 4: forney.kathleen@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 11/19/07 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Draft Air Permit No. 0950203-007-AC
Northern Star Generation Services - Orlando Cogen Limited L.P.
Orlando Cogen Plant
Orange County, Florida

Applicant: The applicant for this project is the Northern Star Generation Services on behalf of Orlando Cogen Limited L.P. The applicant's authorized representative and mailing address is: Mr. Jim Murray, Plant Manager, Northern Star Generation Services, 8275 Exchange Drive; Orlando, Florida 32809.

Facility Location: The Orlando Cogen Plant is located at 8275 Exchange Drive, Orlando in Orange County, Florida.

Project: The existing facility consists of a natural gas-fired combined cycle unit. The combined cycle unit includes: a combustion turbine-electrical generator (CT); a heat recovery steam generator with a duct burner system; and a nominal 50 megawatts (MW) steam turbine-electrical generator (ST).

The permittee has submitted a permit application to replace the rotor (power) section of the CT and to physically upgrade it from an Alstom Model GT 11NM to a Model GT 11NMC by replacement of key components in the compressor section of the CT with improved ones. This upgrade will increase the nominal power rating of the CT as a result of the present and previous projects from 79 to 86.8 MW at the International Standards Organization (ISO) conditions of 59 degrees Fahrenheit and 1 atmosphere of pressure. The total power rating of the combined cycle unit including the CT and the ST is 136.8 MW.

As a result of this upgrade project, the combined cycle unit becomes subject to the Standards of Performance for Stationary Combustion Turbines at 40 Code of Federal Regulations Part 60, Subpart KKKK.

The project is largely an efficiency improvement and will allow production of additional electricity with little or no increase in fuel use. The applicant projected that emissions will not significantly increase after completion of the project compared with historical baseline actual emissions. Therefore, the project is not subject to the rules for the Prevention of Significant Deterioration (PSD) at Section 62-212.400 of the Florida Administrative Code (F.A.C.) or a determination of best available control technology.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station (MS) #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the Draft Permit by visiting the following website: http://www.dep.state.fl.us/air/eproducts/ards and entering the permit number indicated above. A copy of the complete project file is also available at the Air Resources Section of the Department's Central District Office at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. The telephone number is 407/894-7555.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public

comments received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the draft permit and require, if applicable, another Public Notice.

Petitions: The Department will issue the construction 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., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 14 days of publication of the public notice or within 14 days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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 petitioner received notice of the agency decision; (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specified rules or statutes; 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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. 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.

Mediation: Mediation is not available for this proceeding.

DRAFT PERMIT

PERMITTEE:

Northern Star Generation Services Orlando Cogen Limited L.P. 8275 Exchange Drive Orlando, Florida 32809 *Authorized Representative:* Mr. Jim Murray, Plant Manager	Orlando Cogen Plant Air Permit No. 0950203-007-AC Facility ID No. 0950203 SIC No. 4931 Permit Expires: March 31, 2009

PROJECT AND LOCATION

This permit authorizes the permittee to replace the rotor (power) section and to physically upgrade the existing Alstom combustion turbine from a Model GT 11NM to a Model GT 11NMC by replacement of key components in the compressor section.

The combustion turbine is part of a natural-gas-fired combined cycle unit that produces electrical power and steam at the existing Orlando Cogeneration Plant, which is located in Orange County at 8275 Exchange Drive, Orlando, Florida. The UTM coordinates are Zone 17, 459.5 km East, and 3146.1 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 60 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

(DRAFT)

_____ _____

Joseph Kahn, Director (Date)
Division of Air Resource Management

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of a natural gas-fired combined cycle unit. The combined cycle unit includes: a Alstom combustion turbine-electrical generator (CT); a heat recovery steam generator (HRSG) with a duct burner (DB) system; and a nominal 50 megawatts (MW) steam turbine-electrical generator (ST).

This permit authorizes the permittee to replace the rotor (power) section of the CT and to physically upgrade it from a Model GT 11NM to a Model GT 11NMC by replacement of key components in the compressor section of the CT with improved ones. The upgrade will occur in conjunction with a like-kind replacement of the rotor (power) section of the CT. The permit recognizes the increase in the nominal power rating of the combustion turbine as a result of the present and previous projects from 79 to 86.8 MW at the International Standards Organization (ISO) conditions of 59 degrees Fahrenheit and 1 atmosphere of pressure. The total power rating of the combined cycle unit including the CT and the ST is 136.8 MW.

The permit also recognizes the applicability to the combined cycle unit of 40 Code of Federal Regulations Part 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (Subpart KKKK).

The following emissions units (EU) are affected by this permitting action.

EU ID	Emission Unit Description (after the project)
001	A nominal 86.8 MW (ISO) Alstom Model GT 11NMC natural gas-fired combustion turbine
002	A heat recovery steam generator with a natural gas-fired duct burner system having a maximum heat input capacity of 122 million British Thermal Units per hour (MMBtu/hr)

REGULATORY CLASSIFICATION

The facility is not a major source of hazardous air pollutants (HAP).

The combined cycle unit is subject to the acid rain provisions of the Clean Air Act (CAA).

The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

The facility is a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

The combined cycle unit is subject to 40 CFR 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department. This minor source air construction permit supplements Permit No. 0950203-005-AC issued in 2006 and the original Permit No. PSD-FL-184 issued in 1992. Unless otherwise specified, the gas turbine remains subject to the applicable terms and conditions of the two mentioned permit (and their modifications) as well as the current Title V Air Operation Permit (0950203-006-AV).

REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units regulated by this permit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (FDEP) at 2600 Blair Stone Road Mail Station (MS) #5505, Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Orange County Environmental Protection Division, 800 Mercy Drive, Orlando, Florida 32808.

3. Appendices: The following Appendices are attached as part of this permit: Appendix A (related to 40 CFR 60, Subpart A); Appendix GC (General Conditions); Appendix CC (Common Conditions); and Appendix KKKK (related to 40 CFR 60, Subpart KKKK).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the CFR, adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Title V Permit: The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the gas turbine upgrade to a Model GT 11NMC model and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

This section of the permit addresses the following emissions units.

ID	Emission Unit Description (after the project)
001	A nominal 86.8 MW (ISO) Alstom Model GT 11NMC natural gas-fired combustion turbine
002	A heat recovery steam generator with a natural gas-fired duct burner system having a maximum heat input capacity of 122 million British Thermal Units per hour (MMBtu/hr)

ADMINISTRATIVE REQUIREMENTS

1. Previous Permit Conditions: Unless otherwise specified, issuance of this permit does not alter any requirements established in any previously issued air construction or Title V operation permits for the existing gas turbine. Except as specified below, the conditions of this minor air construction permit supplement, and are in addition to, all current valid requirements. [Rule 62-210.300, F.A.C.]

NEWLY APPLICABLE REGULATORY REQUIREMENTS AND EXEMPTIONS

2. New Source Performance Standards (NSPS): The combined cycle unit including the combustion turbine, heat recovery steam generator and duct burner system are subject to 40 CFR 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines. The project is subject to applicable requirements of 40 CFR 60, Subpart A – General Provisions. [Rule 62-204.800, F.A.C.; 40 CFR 60, Subparts A and KKKK]

3. Exemption from certain NSPS: Upon completion of the project, the combustion turbine regulated under 40 CFR 60, Subpart KKKK is exempt from the requirements of 40 CFR 60, Subpart GG – Standards of Performance for Stationary Gas Turbines. Upon completion of the project, the heat recovery steam generator and duct burner system regulated under 40 CFR 60, Subpart KKKK are exempted from the requirements of 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [Rule 62-204.800, F.A.C.; 40 CFR 60.4305(b)]

PROPOSED PROJECTS

4. Rotor Replacement: The permittee is authorized to replace the rotor (power) section of the CT. [Application]

5. Gas Turbine Upgrade: The permittee is authorized to upgrade the CT from a Model GT 11NM to a Model GT 11NMC by replacing the following compressor components with improved parts:
   - Row #1 – 17 compressor blades;
   - Row #1 – 18 inlet compressor guide vanes; and
   - Stage #18 filler pieces.

   [Application]

6. Notifications: Within one week of beginning construction on the project, the permittee shall provide notification that construction has commenced including a schedule for completing the project. The permittee shall also provide notice if a project will not be constructed. The schedule shall be updated for any major changes as necessary. [Rule 6-4.070(3), F.A.C.]

EMISSION LIMITS APPLICABLE TO EMISSIONS UNITS

7. Emission Limits: The emission limits applicable to the CT (EU 001) and the DB (EU 002) are listed in Table 1 from the original Permit No. PSD-FL-184 (reference: Specific Condition 4). Revisions and additions to the limits since their previous revision in Permit No. 0950203-005-AC (reference: Specific Condition 5) are shown as deletions in strikethrough (~~strikethrough~~) and as additions in double underline format. The maximum allowable emissions from this facility shall not exceed the following emission rates:

Table 1

Pollutant	Source	Allowable Emission Standard/Limitation
NO_X	CT	15 ppmvd @ 15% O_2 (~~57.4~~ 63.1 lb/hr; 251.4 TPY)
	DB	0.1 lb/MMBtu
	CT/DB	24-hr rolling average
	CT with DB	15 ppmvd @ 15% O_2 on a 30 unit-days rolling average per 40 CFR 60, Subpart KKKK
CO	CT	10 ppmvd (22.3 lbs/hr; 92.1 TPY)
	DB	0.1 lb/MMBtu (12.2 lbs/hr; 22.5 TPY)
PM/PM_{10}	CT	0.01 lb/MMBtu (~~9.0~~ 9.9 lbs/hr; ~~39.4~~ 43.3 TPY)
	DB	0.01 lb/MMBtu (1.2 lbs/hr; 2.2 TPY)
VOC	CT	~~3.0~~ 3.3 lbs/hr; ~~13.0~~ 14.3 TPY
	DB	3.7 lbs/hr; 6.8 TPY
VE	CT/DB	≤ 10% opacity
SO_2	CT and DB	0.90 pounds megawatt-hour gross output or 0.060 pounds per MMBtu heat input per 40 CFR 60, Subpart KKKK)

NOTE:
1. CT: combustion turbine
   DB: duct burner
2. Natural gas usage only in the CT and DB.
3. Hours of operation:
   a. CT: 8760 hrs/yr
   b. DB: 3688 hrs/yr (at a maximum rate of 122.0 x 10^6 Btu/hr)
4. Maximum heat input:
   a. CT: 890 x 10^6 Btu/hr
   b. DB: 3688 hrs/yr (at a maximum rate of 122.0 x 10^6 Btu/hr)
5. DB operation planned when ambient temperature is greater than 59° F.

The gas turbine remains subject to all other applicable conditions of Permit No. PSD-FL-184 and Permit No. 0950203-005-AC except as modified by Specific Conditions 2, 3 and 7 of this permit.

{Permitting Note: The emission limits listed in Table 1 relating to 40 CFR Part 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines and the associated requirements and conditions are contained in Appendix KKKK}

[Application No. 0950203-007-AC]

TESTING REQUIREMENTS

8. Subpart KKKK Testing Requirements: Refer to Appendix KKKK for the NO_X and SO_2 emission testing and compliance requirements pursuant to 40 CFR 60, Subpart KKKK.

9. Continuous Emissions Monitoring System (CEMS) for NO_X: The existing CEMS presently used to demonstrate compliance with the requirements in previous permits shall also be used to demonstrate compliance with the NO_X limits pursuant to 40 CFR 60, Subpart KKKK.

10. Initial CO Compliance Tests: The gas turbine shall be tested to compliance with the existing emissions standards for CO specified in the Title V permit. An initial test shall be conducted simultaneously with the testing required pursuant to 40 CFR 60, Subparts A and KKKK. The tests shall consist of at least three 1-hour test runs conducted in accordance with EPA Method 10 and EPA Methods 1-4 as necessary. For each CO test run, NO_X emissions data collected from the installed CEMS shall also be reported. Tests shall be conducted within 90% of the maximum heat input rate given actual ambient conditions.
[Rule 62-297.310(7)(a)1, F.A.C.]

ANNUAL REPORTING

11. Future Actual Emissions Reporting. The permittee shall maintain and submit to the Department on an annual basis for a period of 5 years from the date the upgraded 11 NMC combustion turbine is placed in operation, information demonstrating in accordance with Rule 62-212.300(1)(e), F.A.C., using the emissions computation and reporting procedures in Rule 62-210.370, F.A.C., that the implementation of the initiative did not result in an emissions increase of CO and NOx that would equal or exceed the respective significant emission rate as defined in Rule 62-210.200, F.A.C. The baseline emissions for operation prior to the project are 3 tons per year of CO and 232 tons per year of NO_X.
[Rule 62-212.300(1)(e), F.A.C.]

CONTENTS

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

PROJECT

Draft Air Construction Permit No. 0950203-007-AC

Upgrade of Alstom Combustion Turbine to a Model GT 11NMC

Replacement of Rotor (power) Section and Upgrade of Compressor Components

COUNTY

Orange County

APPLICANT

Orlando CoGen Limited, L.P.

(Operating Agent: Northern Star Generation Services Company, LLC)

ARMS Facility ID No. 0950203

PERMITTING AUTHORITY

Florida Department of Environmental Protection

Division of Air Resource Management

Bureau of Air Regulation

Air Permitting South

November 19, 2007

{Filename: 0950203-007-AC - TEPD}

GENERAL PROJECT INFORMATION

Northern Star Generation Services Company operates the Orlando Cogen Plant for Orlando Cogen Limited L.P. The plant is a natural gas-fired combined cycle cogeneration facility (SIC No. 4911) located at 8275 Exchange Drive in Orlando, Florida. The existing facility is subject to the following regulatory categories.

Title I, Part C, Clean Air Act (CAA): The facility is located in an area that is designated as "attainment", "maintenance", or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard (NAAQS). It is classified as a "fossil fuel-fired steam electric plant of more than 250 million British Thermal Unit (MMBtu) per hour of heat input", which is one of the 28 Prevention of Significant Deterioration (PSD) Major Facility Categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year, therefore the facility is classified as a "major stationary source" of air pollution with respect to Rule 62-212.400, Florida Administrative Code (F.A.C.), PSD of Air Quality.

Title I, Section 111, CAA: As a result of the upgrade discussed herein, the gas turbine and the duct burner are now subject to the New Source Performance Standards (NSPS) in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart KKKK which supersedes 40 CFR 60, Subpart GG and 40 CFR 60 and Subpart Dc for this combined cycle unit.

Title I, Section 112, CAA: According to the applications submitted, the facility is not a "Major Source" of hazardous air pollutants (HAP).

Title IV, CAA: The facility operates units subject to the Acid Rain provisions of the Clean Air Act.

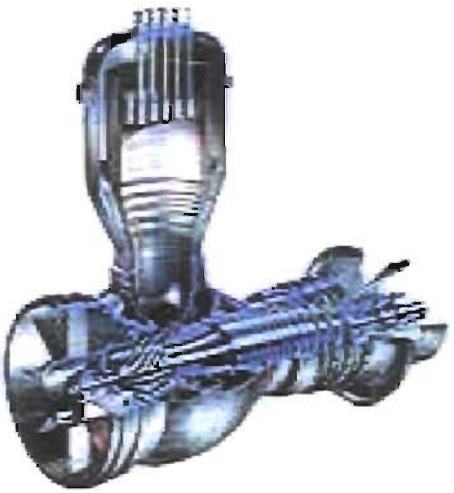
Title V, CAA: The facility is a Title V or "Major Source of Air Pollution" in accordance with Chapter 62-213, F.A.C. because the potential emissions of at least one regulated pollutant exceed 100 tons per year (TPY). Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_X), particulate matter (PM/PM_{10}), sulfur dioxide (SO_2), and volatile organic compounds (VOC).

The combined cycle unit was originally subject to a PSD preconstruction review and determination of best available control technology (BACT) in 1992 and constructed in accordance with Permit No. PSD-FL-184. The original project included an Alstom Model GT11N1 (11N1) combustion turbine (CT) designated as Emissions Unit 001 (EU 001). The project also included EU 002 which is a duct burner (DB) located in the heat recovery steam generator (HRSG) to further augment the steam produced from the heat contained in the CT exhaust.

In April 2005 and January 2006, the Department issued Permit No. 0950203-003-AC and 0950203-005-AC to upgrade the CT from an 11N1 to a Model GT 11NM (11NM), increase the maximum heat input to the CT and install an inlet air fogging system.

Most of the power increase results from substantially improved CT cycle efficiency and is achieved with a relatively small increase in fuel input. According to the company, the improvements make it possible to reduce reliance on the less efficient DB to supply the additional energy required by the combined cycle during peak demand.

A diagram of the very similar Model GT 11N2 from www.alstom.com is shown in Figure 1. The potential benefits of the upgrade to an 11NM are clear based on Figure 2.



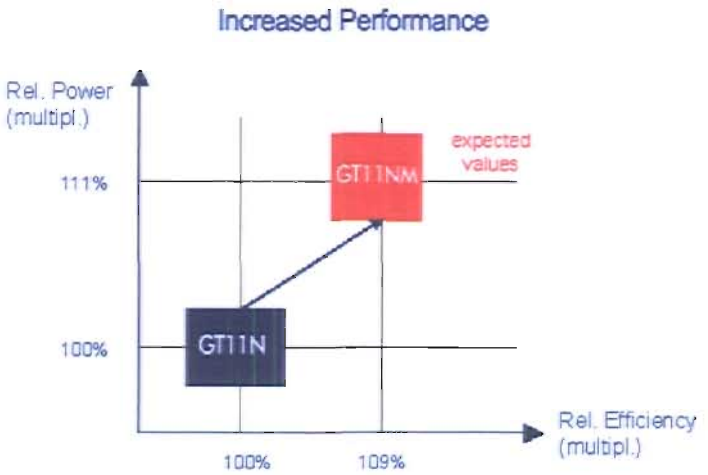


Figure 1. Model GT 11N2 diagram **Figure 2. Benefits of upgrade to Model GT 11NM**

Based on emission projections made during the previous permit evaluation, the project to upgrade to an NM configuration did not trigger a PSD review and a new BACT determination. According to the company, the project has been successful. Usage of the DB has been reduced and the inlet fogging system was not installed. A revised Title V operation permit (Permit No. 0950203-006-AV) incorporating the upgrade to an NM configuration was issued on January 24, 2006.

On August 21, 2007, the permittee submitted an air construction permit application, which is addressed by this Technical Evaluation and Preliminary Determination (TEPD), requesting authorization to further upgrade the existing Alstom gas turbine (EU 001) from an 11NM configuration to a GT 11NMC (11NMC). The upgrade involves the replacement of the CT air compression section with a more efficient one.

The upgrade to an NMC will occur simultaneously with the replacement of the CT rotor (power) section. According to the applicant, the compressor upgrade will consist of the following replacement parts:

- Row #1 – 17 compressor blades;
- Row #1 – 18 inlet compressor guide vanes; and
- Stage #18 filler pieces.
- Improvements to the blow off valve, startup piping and the inlet bell mouth assembly.

According to the applicant, the improved compressor blade design will result in an increase in compressor discharge pressure, which in turn produces an increase in the total mass flow through the turbine. The increase in air flow allows increased fuel firing and power output at approximately the same heat input rate. There will also be less reliance on the less efficient DB during peak demand periods.

According to the applicant, upgrading to a NMC gas turbine will result in a further increase in CT power output, further decreases in DB usage and overall improved cycle efficiency.

KEY APPLICABLE REGULATIONS

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is not a major emitter of HAP. Consequently, 40 CFR 63, Subpart YYYY - National Emission Standard for Hazardous Air Pollutants for Stationary Combustion Turbines does not apply to this combined cycle unit.

New Source Performance Standards (NSPS)

When originally permitted, the CT was subject to 40 CFR 60, Subpart GG – Standards of Performance for Stationary Gas Turbines (Subpart GG). This federal standard and those mentioned below were adopted by reference in Rule 62-204.800, F.A.C. The DB was subject to 40 CFR 60, Subpart Dc - Small Industrial-Commercial-Institutional Steam Generating Units. Subpart (Dc).

Because the project will increase emissions, at least on a short term basis, the CT will be subject to the more stringent 40 CFR 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines (Subpart KKKK). Subpart KKKK regulates the emissions of SO_2 and NO_X from stationary CT and associated DB and HRSG with construction or modification commencing after February 18, 2005.

As a result of the newly applicable and more stringent requirements, Subpart GG and Subpart Dc will no longer apply to the combined cycle unit.

The emissions of SO_2 involve the choice of two limits in Subpart KKKK. The SO_2 limit can either be based on mass per gross power output or mass per heat input basis as summarized below:

- 0.90 pounds SO_2 per megawatt-hour gross output (lb/MWH); or
- 0.060 pounds SO_2 per MMBtu heat input (lb/MMBtu).

According to the permittee, the Orlando Cogeneration facility uses pipeline quality natural gas, which because of its low sulfur content of approximately 2.0 grains (gr) per 100 standard cubic foot (scf), will allow the permittee to meet either of these emissions targets with a large margin of compliance.

For NO_X emissions, based on the maximum heat input rate of greater than 850 MMBtu/hr, in Table 1 of Subpart KKKK there is a choice of two emission limits. One limit is based on the NO_X concentration in the effluent gas while the other is based on mass per power output. These two NOx emission limits are summarized below:

- 15 parts per million by volume, dry at 15 percent oxygen (ppmvd); or
- 0.43 pounds per megawatt-hour gross power output (lb/MWH).

The 15 ppmvd NO_X limit listed above is the same numerical BACT limit set in the original PSD permit. However, the permitted emission limit is based on a 24 hour rolling average and applies only to the CT. The Subpart KKKK NO_X emission limit includes both the CT and the DB and is based on a 30 unit day rolling average. Consequently, once the combustion turbine is modified, the facility will have to meet both NO_X emission limits.

DETERMINATIONS WHETHER THE PROJECT CONSTITUTES A MODIFICATION

Modification and Permitting Applicability

Per Rule 62-210.200(Definitions), F.A.C., a modification is defined as follows:

"Modification" – Any physical change in, the method of operation of, or addition to a facility which would result in ***an increase in the actual emissions*** *of any air pollutant subject to regulation under the Act, including any not previously emitted, from any emissions unit or facility.*

(a) A physical change or change in the method of operation shall not include:

1. *Routine maintenance, repair, or replacement of component parts of an emissions unit; or*
2. *A change in ownership of an emissions unit or facility.*

(b) For any pollutant that is specifically regulated by the EPA under the Clean Air Act, a change in the method of operation shall not include an increase in the hours of operation or in the production rate, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975.

(c) For any pollutant that is not specifically regulated by the EPA under the Clean Air Act, a change in the method of operation shall not include an increase in the hours of operation or in the production rate, unless such change would exceed any restriction on hours of operation or production rate included in any applicable Department air construction or air operation permit.

The upgrade from an 11NM to an 11NMC is a physical change and it is not routine maintenance, repair or replacement of component parts of an emissions unit.

Per Rule 62-210.200(11), F.A.C., a "Actual Emissions" is defined as follows:

"Actual Emissions" – The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:

(a) In general, ***actual emissions*** *as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department shall allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.*

(b) The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that such unit-specific allowable emissions limits are federally enforceable.

(c) For any emissions unit that has not begun normal operations on a particular date, actual emissions shall equal the potential emissions of the emissions unit on that date.

Any comparison of recent actual emissions per (a) above with allowable or potential emissions per (b) or (c) above will result in an increase of emissions. Additionally, the applicant acknowledges that there can be short term emissions increases from the CT associated with the upgrade. This meets the definition of modification at 40 CFR 60, Subpart A – General Provisions (Section 60.2, Definitions), also adopted at Rule 62-204.800, F.A.C.

Based on the foregoing analysis, the project to upgrade the 11NM to an 11 NMC constitutes a modification with respect to the Department's rules and requires a construction permit in accordance with Rule 62-210, F.A.C.

Major Modification and PSD Permitting Applicability

It is also necessary to determine whether the modification is subject to the Department's PSD rules at 62-212.400, F.A.C. The requirements of Sections 62-212.400(4) through (12), F.A.C., apply to major modifications of existing major stationary source. The key criterion is a comparison of *baseline actual* to *projected actual* emissions. Baseline actual emissions are defined for electric utility steam units at Section 62-210.200(Definitions), F.A.C. as follows:

For any existing electric utility steam generating unit, ***baseline actual emissions*** *means the average rate, in tons per year, at which the unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 5-year period immediately preceding the date a complete permit application is received by the Department. The Department shall allow the use of a different time period upon a determination that it is more representative of normal source operation.*

Projected future actual emissions are defined at Section 62-210.200(248) as follows:

"Projected Actual Emissions" – The maximum annual rate, in tons per year, at which an existing emissions unit is projected to emit a PSD pollutant in any one of the 5 years following the date the unit resumes regular operation after the project, or in any one of the 10 years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit that PSD pollutant and full utilization of the unit would result in a significant emissions increase or a significant net emissions increase at the major stationary source. One year is one 12-month period. In determining the projected actual emissions, the Department:

(a) Shall consider all relevant information, including historical operational data, the company's own representations, the company's expected business activity and the company's highest projections of business activity, the company's filings with the State or Federal regulatory authorities, and compliance plans or orders, including consent orders; and

(b) Shall include fugitive emissions to the extent quantifiable and emissions associated with startups and shutdowns; and

(c) Shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth; or

(d) In lieu of using the method set out in paragraphs (a) through (c) above, may be directed by the owner or operator to use the emissions unit's potential to emit, in tons per year.

A *major modification* requires a PSD permit and is defined at Section 62-210.200(Definitions), F.A.C. as follows:

"Major Modification" – (a) Any physical change in or change in the method of operation of a major stationary source that would result in a ***significant emissions increase*** *of a PSD pollutant and a* ***significant net emissions increase*** *of that pollutant from the major stationary source.*

Significant emissions rate, for the purpose of determining whether a significant net emissions increase (SNEI) has occurred, is defined at 62-210.200(Definitions), F.A.C. The part of the definition that includes CO and NOx are as follows:

(a) With respect to any emissions increase or any net emissions increase, or the potential of a facility to emit any of the following pollutants, significant emissions rate means a rate of pollutant emissions that would equal or exceed:

1. A rate listed at 40 CFR 52.21(b)(23)(i), adopted by reference at Rule 62-204.800, F.A.C.; specifically, any of the following rates:

a. Carbon monoxide: 100 tons per year (tpy);

b. Nitrogen oxides: 40 tpy;

The significant emissions rates (SER) for CO and NO_X are low compared with the typical annual emissions from combined cycle units. Therefore the possibility of a SNEI for CO or NO_X is a consideration.

The applicant submitted a summary of emissions data for the period 2001-2006. There is some uncertainty regarding the precise five-year period to select for determination of the applicable 24-month period for estimation of baseline actual emissions. This is because a partial upgrade to an 11NM that occurred in 2005 that is being aggregated in the present review with the further upgrade to an 11NMC. Also year 2001 is outside of the five year window. It could still be considered in the revised analysis. The issue is moot because the 24-month period of 2002-2003 has been selected for all pollutants listed in the table below. This period would be available under any scenario.

Table 1. Baseline actual emissions submitted by the applicant (CT and DB combined).

Year of Operation	NO_X (TPY)	SO_2 (TPY)	CO (TPY)	PM/PM_{10} (TPY)	VOC (TPY)
2001	241	2	4	31	14
2002	225	2	3	32	14
2003	240	3	3	33	17
2004	143	2	3	26	15
2005	196	2	3	29	14
2006	198	2	4	31	15
Baseline Actual Emissions (24-month period)	233 (2002-03)	3 (2002-03)	3 (2002-03)	33 (2002-03)	16 (2002-03)

The applicant has projected future actual emissions and based them on the high level of dispatch achieved in 2006. The estimates are shown in the following table.

Table 2. Projected actual emissions submitted by the applicant (CT and DB combined)

Year of Operation	NO_X (TPY)	SO_2 (TPY)	CO (TPY)	PM/PM_{10} (TPY)	VOC (TPY)
Beyond 2008	217	3	4	34	16

Following is a comparison of baseline actual emissions with projected actual emissions to determine the applicability of PSD.

Table 3. Projected actual emissions submitted by the applicant (CT and DB combined)

	NO_X (TPY)	SO_2 (TPY)	CO (TPY)	PM/PM_{10} (TPY)	VOC (TPY)
Baseline actual emissions	233	3	3	33	16
Beyond 2008	217	3	4	34	16
Increase (decrease)	(16)	0	1	1	0
SNEI	40	40	100	25/15	40
Trigger PSD?	No	No	No	No	No

Based on the information submitted by the applicant, the project to upgrade the combustion turbine from a Model GT 11NM to a Model GT 11NMC will not trigger a PSD review or a BACT determination.

The Department concludes that the project does not constitute a major stationary source modification and that a PSD review does not apply and a BACT determination is not required.

DRAFT PERMIT CONDITIONS

The main permit conditions will be to: authorize the replacement of the rotor section; replace key compressor components with improved ones; include the requirements of 40 CFR 60, Subpart KKKK; exempt the facility from the requirements of 40 CFR 60 Subparts GG and Dc; update the emission limits and power capacity rating; and require reporting of future actual emissions. The combined cycle unit shall remain subject to all other valid terms and conditions in the original PSD air construction and Title V air operation permit.

PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does trigger a PSD review.

David Read is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 or by phone at 850-414-7268.

Harvey, Mary

From: Harvey, Mary

Sent: Monday, November 19, 2007 3:51 PM

To: 'jim.murray@northernstargen.com'; 'davekellermeyer@northernstargen.com'; 'sosbourn@golder.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'

Cc: Linero, Alvaro; Adams, Patty; Gibson, Victoria

Subject: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

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Bradner, James	Read: 11/19/2007 4:51 PM
'lori.cunniff@ocfl.net'	
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Sent: Tuesday, December 11, 2007 3:45 PM
To: Harvey, Mary
Subject: RE: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Received.

Regards,

Dave Kellermeyer

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To: Kellermeyer, Dave
Subject: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

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Cc: Read, David; Adams, Patty
Subject: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

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Sent: Monday, November 19, 2007 4:41 PM
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Subject: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

From: Harvey, Mary
Sent: Monday, November 19, 2007 3:51 PM
To: 'jim.murray@northernstargen.com'; 'davekellermeyer@northernstargen.com'; 'sosbourn@golder.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'
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Harvey, Mary

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To: Harvey, Mary
Sent: Monday, November 19, 2007 4:51 PM
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Harvey, Mary

From: Murray, Jim [jim.murray@northernstargen.com]
Sent: Monday, November 19, 2007 4:01 PM
To: Harvey, Mary
Subject: RE: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Received
JIM

James T Murray
407-851-1350 ext.2022

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, November 19, 2007 3:51 PM
To: Murray, Jim; davekellermeyer@northernstargen.com; sosbourn@golder.com; Bradner, James; lori.cunniff@ocfl.net; little.james@epamail.epa.gov; forney.kathleen@epa.gov
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Subject: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

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Thank you,

DEP, Bureau of Air Regulation

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

Harvey, Mary

From: Murray, Jim [jim.murray@northernstargen.com]
To: Harvey, Mary
Sent: Monday, November 19, 2007 3:56 PM
Subject: Read: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Your message

To: jim.murray@northernstargen.com
Subject:

was read on 11/19/2007 3:56 PM.

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Monday, November 19, 2007 4:05 PM
Subject: Read: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Your message

To:	'jim.murray@northernstargen.com'; 'davekellermeyer@northernstargen.com'; 'sosbourn@golder.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'
Cc:	Linero, Alvaro; Adams, Patty; Gibson, Victoria
Subject:	Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT
Sent:	11/19/2007 3:51 PM

was read on 11/19/2007 4:05 PM.

Harvey, Mary

From: Linero, Alvaro
To: Harvey, Mary
Sent: Monday, November 19, 2007 4:14 PM
Subject: Read: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Your message

To: Linero, Alvaro
Subject: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT
Sent: 11/19/2007 3:56 PM

was read on 11/19/2007 4:14 PM.

Harvey, Mary

From: Lori.Cunniff@ocfl.net
To: Harvey, Mary
Sent: Monday, November 19, 2007 3:56 PM
Subject: Read: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Your message

To: Lori.Cunniff@ocfl.net
Subject:

was read on 11/19/2007 3:56 PM.

Harvey, Mary

From: Read, David
To: Harvey, Mary
Sent: Tuesday, November 20, 2007 1:12 PM
Subject: Read: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Your message

To:	'dave.kellermeyer@northernstargen.com'
Cc:	Read, David; Adams, Patty
Subject:	FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT
Sent:	11/20/2007 11:55 AM

was read on 11/20/2007 1:11 PM.

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Tuesday, November 20, 2007 12:07 PM
Subject: Read: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Your message

To:	'dave.kellermeyer@northernstargen.com'
Cc:	Read, David; Adams, Patty
Subject:	FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT
Sent:	11/20/2007 11:55 AM

was read on 11/20/2007 12:07 PM.

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Monday, November 19, 2007 4:25 PM
Subject: Read: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Your message

To: Adams, Patty
Subject: FW: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT
Sent: 11/19/2007 4:22 PM

was read on 11/19/2007 4:25 PM.

Harvey, Mary

From: Bradner, James
Sent: Friday, November 30, 2007 7:48 AM
To: Harvey, Mary
Subject: RE: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Here's my reply in case I missed this the first time. Thanks!

From: Harvey, Mary
Sent: Monday, November 19, 2007 3:51 PM
To: 'jim.murray@northernstargen.com'; 'davekellermeyer@northernstargen.com'; 'sosbourn@golder.com'; Bradner, James; 'lori.cunniff@ocfl.net'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'
Cc: Linero, Alvaro; Adams, Patty; Gibson, Victoria
Subject: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

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Thank you,

DEP, Bureau of Air Regulation

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Monday, November 26, 2007 2:51 PM
To: Harvey, Mary
Subject: Re: Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Attachments: COVER-0950203-007-AC-DRAFT.pdf; NOTICES-0950203-007-AC-DRAFT.pdf; TECHNICAL-0950203-007-AC-DRAFT.pdf; DRAFTPERMIT-0950203-007-AC-DRAFT.pdf




COVER-0950203-00NOTICES-0950203-TECHNICAL-095020DRAFTPERMIT-095
7-AC-DRAFT.pdf... 007-AC-DRAFT.p... 3-007-AC-DRAFT...0203-007-AC-DRA...

My email showed I responded to this one, but maybe it got lost in the electronic abyss...
thanks,
Katy

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary" <Mary.Harvey@dep.state.fl.us>

11/19/2007 03:51 PM

To <jim.murray@northernstargen.com>, <davekellermeyer@northernstargen.com>, <sosbourn@golder.com>, "Bradner, James" <James.Bradner@dep.state.fl.us>, <lori.cunniff@ocfl.net>, James Little/R4/USEPA/US@EPA, Kathleen Forney/R4/USEPA/US@EPA

cc "Linero, Alvaro" <Alvaro.Linero@dep.state.fl.us>, "Adams, Patty" <Patty.Adams@dep.state.fl.us>, "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>

Subject Orlando Cogen, LLP - DEP File #0950203-007-AC-DRAFT

Dear Sir/Madam:

Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:

Northern Star Generation Services
Orlando Cogen Limited L.P.
8275 Exchange Drive
Orlando, Florida 32809

Authorized Representative:
Mr. Jim Murray, Plant Manager

Orlando Cogen Plant
Air Permit No. 0950203-007-AC
Facility ID No. 0950203
SIC No. 4931
Permit Expires: March 31, 2009

PROJECT AND LOCATION

This permit authorizes the permittee to replace the rotor (power) section and to physically upgrade the existing Alstom combustion turbine from a Model GT 11NM to a Model GT 11NMC by replacement of key components in the compressor section.

The combustion turbine is part of a natural-gas-fired combined cycle unit that produces electrical power and steam at the existing Orlando Cogeneration Plant, which is located in Orange County at 8275 Exchange Drive, Orlando, Florida. The UTM coordinates are Zone 17, 459.5 km East, and 3146.1 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 60 of the Code of Federal Regulations (CFR). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

(FINAL)

Trina L Vielhauer 2/6/08

Joseph Kahn, Director (Date)
Division of Air Resource Management

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of a natural gas-fired combined cycle unit. The combined cycle unit includes: a Alstom combustion turbine-electrical generator (CT); a heat recovery steam generator (HRSG) with a duct burner (DB) system; and a nominal 50 megawatts (MW) steam turbine-electrical generator (ST).

This permit authorizes the permittee to replace the rotor (power) section of the CT and to physically upgrade it from a Model GT 11NM to a Model GT 11NMC by replacement of key components in the compressor section of the CT with improved ones. The upgrade will occur in conjunction with a like-kind replacement of the rotor (power) section of the CT. The permit recognizes the increase in the nominal power rating of the combustion turbine as a result of the present and previous projects from 79 to 86.8 MW at the International Standards Organization (ISO) conditions of 59 degrees Fahrenheit and 1 atmosphere of pressure. The total power rating of the combined cycle unit including the CT and the ST is 136.8 MW.

The permit also recognizes the applicability to the combined cycle unit of 40 Code of Federal Regulations Part 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (Subpart KKKK).

The following emissions units (EU) are affected by this permitting action.

EU ID	Emission Unit Description (after the project)
001	A nominal 86.8 MW (ISO) Alstom Model GT 11NMC natural gas-fired combustion turbine
002	A heat recovery steam generator with a natural gas-fired duct burner system having a maximum heat input capacity of 122 million British Thermal Units per hour (MMBtu/hr)

REGULATORY CLASSIFICATION

The facility is not a major source of hazardous air pollutants (HAP).

The combined cycle unit is subject to the acid rain provisions of the Clean Air Act (CAA).

The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

The facility is a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

The combined cycle unit is subject to 40 CFR 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines.

RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department. This minor source air construction permit supplements Permit No. 0950203-005-AC issued in 2006 and the original Permit No. PSD-FL-184 issued in 1992. Unless otherwise specified, the gas turbine remains subject to the applicable terms and conditions of the two mentioned permit (and their modifications) as well as the current Title V Air Operation Permit (0950203-006-AV).

REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct, modify, or operate emissions units regulated by this permit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (FDEP) at 2600 Blair Stone Road Mail Station (MS) #5505, Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Orange County Environmental Protection Division, 800 Mercy Drive, Orlando, Florida 32808.

3. Appendices: The following Appendices are attached as part of this permit: Appendix A (related to 40 CFR 60, Subpart A); Appendix GC (General Conditions); Appendix CC (Common Conditions); and Appendix KKKK (related to 40 CFR 60, Subpart KKKK).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the CFR, adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Title V Permit: The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the gas turbine upgrade to a Model GT 11NMC model and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

This section of the permit addresses the following emissions units.

ID	Emission Unit Description (after the project)
001	A nominal 86.8 MW (ISO) Alstom Model GT 11NMC natural gas-fired combustion turbine
002	A heat recovery steam generator with a natural gas-fired duct burner system having a maximum heat input capacity of 122 million British Thermal Units per hour (MMBtu/hr)

ADMINISTRATIVE REQUIREMENTS

1. Previous Permit Conditions: Unless otherwise specified, issuance of this permit does not alter any requirements established in any previously issued air construction or Title V operation permits for the existing gas turbine. Except as specified below, the conditions of this minor air construction permit supplement, and are in addition to, all current valid requirements. [Rule 62-210.300, F.A.C.]

NEWLY APPLICABLE REGULATORY REQUIREMENTS AND EXEMPTIONS

2. New Source Performance Standards (NSPS): The combined cycle unit including the combustion turbine, heat recovery steam generator and duct burner system are subject to 40 CFR 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines. The project is subject to applicable requirements of 40 CFR 60, Subpart A – General Provisions. [Rule 62-204.800, F.A.C.; 40 CFR 60, Subparts A and KKKK]

3. Exemption from certain NSPS: Upon completion of the project, the combustion turbine regulated under 40 CFR 60, Subpart KKKK is exempt from the requirements of 40 CFR 60, Subpart GG – Standards of Performance for Stationary Gas Turbines. Upon completion of the project, the heat recovery steam generator and duct burner system regulated under 40 CFR 60, Subpart KKKK are exempted from the requirements of 40 CFR 60, Subpart Db – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [Rule 62-204.800, F.A.C.; 40 CFR 60.4305(b)]

PROPOSED PROJECTS

4. Rotor Replacement: The permittee is authorized to replace the rotor (power) section of the CT. [Application]

5. Gas Turbine Upgrade: The permittee is authorized to upgrade the CT from a Model GT 11NM to a Model GT 11NMC by replacing the following compressor components with improved parts:
   - Row #1 – 17 compressor blades;
   - Row #1 – 18 inlet compressor guide vanes; and
   - Stage #18 filler pieces.

   [Application]

6. Notifications: Within one week of beginning construction on the project, the permittee shall provide notification that construction has commenced including a schedule for completing the project. The permittee shall also provide notice if a project will not be constructed. The schedule shall be updated for any major changes as necessary. [Rule 6-4.070(3), F.A.C.]

EMISSION LIMITS APPLICABLE TO EMISSIONS UNITS

7. Emission Limits: The emission limits applicable to the CT (EU 001) and the DB (EU 002) are listed in Table 1. The maximum allowable emissions from this facility shall not exceed the following emission rates:

Table 1

Pollutant	Source	Allowable Emission Standard/Limitation
NO_X	CT	15 ppmvd @ 15% O_2 (63.1 lb/hr; 251.4 TPY)
	DB	0.1 lb/MMBtu (12.2 lbs/hr; 22.5 TPY)
	CT, CT/DB	24-hr rolling average (applies to lb/hr emission limits)
	DB	Annual Testing
	CT with DB	15 ppmvd @ 15% O_2 on a 30 unit-days rolling average per 40 CFR 60, Subpart KKKK
CO	CT	10 ppmvd (22.3 lbs/hr; 92.1 TPY)
	DB	0.1 lb/MMBtu (12.2 lbs/hr; 22.5 TPY)
PM/PM_{10}	CT	0.01 lb/MMBtu (9.9 lbs/hr; 43.3 TPY)
	DB	0.01 lb/MMBtu (1.2 lbs/hr; 2.2 TPY)
VOC	CT	3.3 lbs/hr; 14.3 TPY
	DB	3.7 lbs/hr; 6.8 TPY
VE	CT/DB	≤ 10% opacity
SO_2	CT and DB	0.90 pounds megawatt-hour gross output or 0.060 pounds per MMBtu heat input per 40 CFR 60, Subpart KKKK)

NOTE:
1. CT: combustion turbine
   DB: duct burner
2. Natural gas usage only in the CT and DB.
3. Hours of operation:
   a. CT: 8760 hrs/yr
   b. DB: 3688 hrs/yr (at a maximum rate of 122.0 x 10^6 Btu/hr)
4. Maximum heat input:
   a. CT: 980 x 10^6 Btu/hr
   b. DB: 3688 hrs/yr (at a maximum rate of 122.0 x 10^6 Btu/hr)
5. DB operation planned when ambient temperature is greater than 59° F.

The gas turbine remains subject to all other applicable conditions of Permit No. PSD-FL-184 and Permit No. 0950203-005-AC except as modified by Specific Conditions 2, 3 and 7 of this permit. Conditions in the Title V operation permit for this facility (0950203-006-AV) will be revised to reflect the changes authorized by this permit, including modifying Specific Conditions C.0 and C.22 to reflect emission changes allowed by this permit.

{Permitting Note: The emission limits listed in Table 1 relating to 40 CFR Part 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines and the associated requirements and conditions are contained in Appendix KKKK}

[Application No. 0950203-007-AC]

TESTING REQUIREMENTS

8. Subpart KKKK Testing Requirements: Refer to Appendix KKKK for the NO_X and SO_2 emission testing and compliance requirements pursuant to 40 CFR 60, Subpart KKKK.

9. Continuous Emissions Monitoring System (CEMS) for NO_X: The existing CEMS presently used to demonstrate compliance with the requirements in previous permits shall also be used to demonstrate compliance with the NO_X limits pursuant to 40 CFR 60, Subpart KKKK.

10. Initial CO Compliance Tests: The gas turbine shall be tested to compliance with the existing emissions standards for CO specified in the Title V permit. An initial test shall be conducted simultaneously with the testing required pursuant to 40 CFR 60, Subparts A and KKKK. The tests shall consist of at least three 1-hour test runs conducted in accordance with EPA Method 10 and EPA Methods 1-4 as necessary. For each CO test run, NO_X emissions data collected from the installed CEMS shall also be reported. Tests shall be conducted within 90% of the maximum heat input rate given actual ambient conditions.
[Rule 62-297.310(7)(a)1, F.A.C.]

ANNUAL REPORTING

11. Future Actual Emissions Reporting. The permittee shall maintain and submit to the Department on an annual basis for a period of 5 years from the date the upgraded 11 NMC combustion turbine is placed in operation, information demonstrating in accordance with Rule 62-212.300(1)(e), F.A.C., using the emissions computation and reporting procedures in Rule 62-210.370, F.A.C., that the implementation of the initiative did not result in an emissions increase of CO and NOx that would equal or exceed the respective significant emission rate as defined in Rule 62-210.200, F.A.C. The baseline emissions for operation prior to the project are 3 tons per year of CO and 233 tons per year of NO_X.
[Rule 62-212.300(1)(e), F.A.C.]

SECTION 4. APPENDICES

CONTENTS

NSPS SUBPART A

The provisions of this Subpart may be provided in full upon request. Emissions units subject to a New Source Performance Standard of 40 CFR 60 are also subject to the applicable requirements of Subpart A, the General Provisions, including:

§ 60.1 Applicability.

§ 60.2 Definitions.

§ 60.3 Units and abbreviations.

§ 60.4 Address.

§ 60.5 Determination of construction or modification.

§ 60.6 Review of plans.

§ 60.7 Notification and Record Keeping.

§ 60.8 Performance Tests.

§ 60.9 Availability of information.

§ 60.10 State Authority.

§ 60.11 Compliance with Standards and Maintenance Requirements.

§ 60.12 Circumvention.

§ 60.13 Monitoring Requirements.

§ 60.14 Modification.

§ 60.15 Reconstruction.

§ 60.16 Priority List.

§ 60.17 Incorporations by Reference.

§ 60.18 General Control Device Requirements.

§ 60.19 General Notification and Reporting Requirements.

Individual subparts may exempt specific equipment or processes from some or all of these requirements. The general provisions may be provided in full upon request.

GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

   a. Have access to and copy and records that must be kept under the conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

   Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

   a. A description of and cause of non-compliance; and

   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

   The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

    a. Determination of Best Available Control Technology ( );
    b. Determination of Prevention of Significant Deterioration ( );
    c. Compliance with New Source Performance Standards (X); and
    d. Compliance with National Emission Standards for Hazardous Air Pollutants for Source Categories ( ).

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

    c. Records of monitoring information shall include:

        1) The date, exact place, and time of sampling or measurements;
        2) The person responsible for performing the sampling or measurements;
        3) The dates analyses were performed;
        4) The person responsible for performing the analyses;
        5) The analytical techniques or methods used; and
        6) The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

COMMON CONDITIONS

{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

Testing Requirements

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables

corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

11. Operating Rate during Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.

    a. *Required Sampling Time.* Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.

    b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

    c. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

    [Rule 62-297.310(4), F.A.C.]

14. Determination of Process Variables

    a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

    [Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

    1. The type, location, and designation of the emissions unit tested.
    2. The facility at which the emissions unit is located.
    3. The owner or operator of the emissions unit.
    4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
    5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
    6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
    7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
    8. The date, starting time and duration of each sampling run.
    9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
    10. The number of points sampled and configuration and location of the sampling plane.
    11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
    12. The type, manufacturer and configuration of the sampling equipment used.
    13. Data related to the required calibration of the test equipment.
    14. Data on the identification, processing and weights of all filters used.
    15. Data on the types and amounts of any chemical solutions used.
    16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.

17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

Subpart KKKK--Standards of Performance for Stationary Combustion Turbines

Introduction

40 CFR 60.4300 What is the purpose of this subpart?

This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification or reconstruction after February 18, 2005.

Applicability

40 CFR 60.4305 Does this subpart apply to my stationary combustion turbine?

(a) If you are the owner or operator of a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, your turbine is subject to this subpart. Only heat input to the combustion turbine should be included when determining whether or not this subpart is applicable to your turbine. Any additional heat input to associated heat recovery steam generators (HRSG) or duct burners should not be included when determining your peak heat input. However, this subpart does apply to emissions from any associated HRSG and duct burners.

(b) Stationary combustion turbines regulated under this subpart are exempt from the requirements of subpart GG of 40 CFR 60. Heat recovery steam generators and duct burners regulated under this subpart are exempted from the requirements of subparts Da, Db, and Dc of 40 CFR 60.

40 CFR 60.4310 What types of operations are exempt from these standards of performance?

(a) Emergency combustion turbines, as defined in 40 CFR 60.4420(i), are exempt from the nitrogen oxides (NO_X) emission limits in 40 CFR 60.4320.

(b) Stationary combustion turbines engaged by manufacturers in research and development of equipment for both combustion turbine emission control techniques and combustion turbine efficiency improvements are exempt from the NO_X emission limits in 40 CFR 60.4320 on a case-by-case basis as determined by the Administrator.

(c) Stationary combustion turbines at integrated gasification combined cycle electric utility steam generating units that are subject to subpart Da of 40 CFR 60 are exempt from this subpart.

(d) Combustion turbine test cells/stands are exempt from this subpart.

Emission Limits

40 CFR 60.4315 What pollutants are regulated by this subpart?

The pollutants regulated by this subpart are nitrogen oxide (NO_X) and sulfur dioxide (SO_2).

40 CFR 60.4320 What emission limits must I meet for nitrogen oxides (NO_X)?

(a) You must meet the emission limits for NO_X specified in Table 1 to this subpart.

(b) If you have two or more turbines that are connected to a single generator, each turbine must meet the emission limits for NO_X.

40 CFR 60.4325 What emission limits must I meet for NO_X if my turbine burns both natural gas and distillate oil (or some other combination of fuels)?

You must meet the emission limits specified in Table 1 to this subpart. If your total heat input is greater than or equal to 50 percent natural gas, you must meet the corresponding limit for a natural gas-fired turbine when you are burning that fuel. Similarly, when your total heat input is greater than 50 percent distillate oil and fuels other than natural gas, you must meet the corresponding limit for distillate oil and fuels other than natural gas for the duration of the time that you burn that particular fuel.

40 CFR 60.4330 What emission limits must I meet for sulfur dioxide (SO_2)?

(a) If your turbine is located in a continental area, you must comply with either paragraph (a)(1) or (a)(2) of this section. If your turbine is located in Alaska, you do not have to comply with the requirements in paragraph (a) of this section until January 1, 2008.

(1) You must not cause to be discharged into the atmosphere from the subject stationary combustion turbine any gases which contain SO_2 in excess of 110 nanograms per Joule (ng/J) (0.90 pounds per megawatt-hour (lb/MWh)) gross output, or

(2) You must not burn in the subject stationary combustion turbine any fuel which contains total potential sulfur emissions in excess of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input. If your turbine simultaneously fires multiple fuels, each fuel must meet this requirement.

(b) If your turbine is located in a noncontinental area or a continental area that the Administrator determines does not have access to natural gas and that the removal of sulfur compounds would cause more environmental harm than benefit, you must comply with one or the other of the following conditions:

(1) You must not cause to be discharged into the atmosphere from the subject stationary combustion turbine any gases which contain SO_2 in excess of 780 ng/J (6.2 lb/MWh) gross output, or

(2) You must not burn in the subject stationary combustion turbine any fuel which contains total sulfur with potential sulfur emissions in excess of 180 ng SO_2/J (0.42 lb SO_2/MMBtu) heat input. If your turbine simultaneously fires multiple fuels, each fuel must meet this requirement.

General Compliance Requirements

40 CFR 60.4333 What are my general requirements for complying with this subpart?

(a) You must operate and maintain your stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

(b) When an affected unit with heat recovery utilizes a common steam header with one or more combustion turbines, the owner or operator shall either:

(1) Determine compliance with the applicable NO_X emissions limits by measuring the emissions combined with the emissions from the other unit(s) utilizing the common heat recovery unit; or

(2) Develop, demonstrate, and provide information satisfactory to the Administrator on methods for apportioning the combined gross energy output from the heat recovery unit for each of the affected combustion turbines. The Administrator may approve such demonstrated substitute methods for apportioning the combined gross energy output measured at the steam turbine whenever the demonstration ensures accurate estimation of emissions related under 40 CFR 60.

Monitoring

40 CFR 60.4335 How do I demonstrate compliance for NO_X if I use water or steam injection?

(a) If you are using water or steam injection to control NO_X emissions, you must install, calibrate, maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water or steam to fuel being fired in the turbine when burning a fuel that requires water or steam injection for compliance.

(b) Alternatively, you may use continuous emission monitoring, as follows:

(1) Install, certify, maintain, and operate a continuous emission monitoring system (CEMS) consisting of a NO_X monitor and a diluent gas (oxygen (O_2) or carbon dioxide (CO_2)) monitor, to determine the hourly NO_X emission rate in parts per million (ppm) or pounds per million British thermal units (lb/MMBtu); and

(2) For units complying with the output-based standard, install, calibrate, maintain, and operate a fuel flow meter (or flow meters) to continuously measure the heat input to the affected unit; and

(3) For units complying with the output-based standard, install, calibrate, maintain, and operate a watt meter (or meters) to continuously measure the gross electrical output of the unit in megawatt-hours; and

(4) For combined heat and power units complying with the output-based standard, install, calibrate, maintain, and operate meters for useful recovered energy flow rate, temperature, and pressure, to continuously measure the total thermal energy output in British thermal units per hour (Btu/h).

40 CFR 60.4340 How do I demonstrate continuous compliance for NO_X if I do not use water or steam injection?

(a) If you are not using water or steam injection to control NO_X emissions, you must perform annual performance tests in accordance with 40 CFR 60.4400 to demonstrate continuous compliance. If the NO_X emission result from the performance test is less than or equal to 75 percent of the NO_X emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_X emission limit for the turbine, you must resume annual performance tests.

(b) As an alternative, you may install, calibrate, maintain and operate one of the following continuous monitoring systems:

(1) Continuous emission monitoring as described in 40 CFR 60.4335(b) and 40 CFR60.4345, or

(2) Continuous parameter monitoring as follows:

(i) For a diffusion flame turbine without add-on selective catalytic reduction (SCR) controls, you must define parameters indicative of the unit's NO_X formation characteristics, and you must monitor these parameters continuously.

(ii) For any lean premix stationary combustion turbine, you must continuously monitor the appropriate parameters to determine whether the unit is operating in low-NO_X mode.

(iii) For any turbine that uses SCR to reduce NO_X emissions, you must continuously monitor appropriate parameters to verify the proper operation of the emission controls.

(iv) For affected units that are also regulated under part 75 of 40 CFR, with state approval you can monitor the NO_X emission rate using the methodology in appendix E to part 75 of 40 CFR, or the low mass emissions methodology in 40 CFR 75.19, the requirements of this paragraph (b) may be met by performing the parametric monitoring described in section 2.3 of 40 CFR 75 appendix E or in 40 CFR 75.19(c)(1)(iv)(H).

40 CFR 60.4345 What are the requirements for the continuous emission monitoring system equipment, if I choose to use this option?

If the option to use a NO_X CEMS is chosen:

(a) Each NO_X diluent CEMS must be installed and certified according to Performance Specification 2 (PS 2) in appendix B to 40 CFR 60, except the 7-day calibration drift is based on unit operating days, not calendar days. With state approval, Procedure 1 in appendix F to 40 CFR 60 is not required. Alternatively, a NO_X diluent CEMS that is installed and certified according to appendix A of part 75 of 40 CFR is acceptable for

use under this subpart. The relative accuracy test audit (RATA) of the CEMS shall be performed on a lb/MMBtu basis.

(b) As specified in 40 CFR 60.13(e)(2), during each full unit operating hour, both the NO_X monitor and the diluent monitor must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained with each monitor for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required for each monitor to validate the NO_X emission rate for the hour.

(c) (c) Each fuel flowmeter shall be installed, calibrated, maintained, and operated according to the manufacturer's instructions. Alternatively, with state approval, fuel flowmeters that meet the installation, certification, and quality assurance requirements of appendix D to part 75 of 40 CFR are acceptable for use under this subpart.

(d) Each watt meter, steam flow meter, and each pressure or temperature measurement device shall be installed, calibrated, maintained, and operated according to manufacturer's instructions.

(e) The owner or operator shall develop and keep on-site a quality assurance (QA) plan for all of the continuous monitoring equipment described in paragraphs (a), (c), and (d) of this section. For the CEMS and fuel flow meters, the owner or operator may, with state approval, satisfy the requirements of this paragraph by implementing the QA program and plan described in section 1 of appendix B to part 75 of 40 CFR.

40 CFR 60.4350 How do I use data from the continuous emission monitoring equipment to identify excess emissions?

For purposes of identifying excess emissions:

(a) All CEMS data must be reduced to hourly averages as specified in 40 CFR 60.13(h).

(b) For each unit operating hour in which a valid hourly average, as described in 40 CFR 60.4345(b), is obtained for both NO_X and diluent monitors, the data acquisition and handling system must calculate and record the hourly NO_X emission rate in units of ppm or lb/MMBtu, using the appropriate equation from method 19 in appendix A of 40 CFR 60. For any hour in which the hourly average O_2 concentration exceeds 19.0 percent O_2 (or the hourly average CO_2 concentration is less than 1.0 percent CO_2), a diluent cap value of 19.0 percent O_2 or 1.0 percent CO_2 (as applicable) may be used in the emission calculations.

(c) Correction of measured NO_X concentrations to 15 percent O_2 is not allowed.

(d) If you have installed and certified a NO_X diluent CEMS to meet the requirements of part 75 of 40 CFR, states can approve that only quality assured data from the CEMS shall be used to identify excess emissions under this subpart. Periods where the missing data substitution procedures in subpart D of 40 CFR 75 are applied are to be reported as monitor downtime in the excess emissions and monitoring performance report required under 40 CFR 60.7(c).

(e) All required fuel flow rate, steam flow rate, temperature, pressure, and megawatt data must be reduced to hourly averages.

(f) Calculate the hourly average NO_X emission rates, in units of the emission standards under 40 CFR 60.4320, using either ppm for units complying with the concentration limit or the following equation for units complying with the output based standard:

(1) For simple-cycle operation:

$$E = \frac{(NO_X)_h * (HI)_h}{P} \qquad \text{(Eq. 1)}$$

Where:

E = hourly NO_X emission rate, in lb/MWh,
$(NO_X)_h$ = hourly NO_X emission rate, in lb/MMBtu,
$(HI)_h$ = hourly heat input rate to the unit, in MMBtu/h, measured using the fuel flowmeter(s), e.g., calculated using Equation D-15a in appendix D to part 75 of 40 CFR, and
P = gross energy output of the combustion turbine in MW.

(2) For combined-cycle and combined heat and power complying with the output-based standard, use Equation 1 of this subpart, except that the gross energy output is calculated as the sum of the total electrical and mechanical energy generated by the combustion turbine, the additional electrical or mechanical energy (if any) generated by the steam turbine following the heat recovery steam generator, and 100 percent of the total useful thermal energy output that is not used to generate additional electricity or mechanical output, expressed in equivalent MW, as in the following equations:

$$P = (PE)_t + (PE)_c + P_s + P_o \qquad \text{(Eq. 2)}$$

Where:

P = gross energy output of the stationary combustion turbine system in MW.
(Pe)t = electrical or mechanical energy output of the combustion turbine in MW,
(Pe)c = electrical or mechanical energy output (if any) of the steam turbine in MW, and

$$P_s = \frac{Q * H}{3.413 X 10^6 \, Btu / MWh} \qquad \text{(Eq. 3)}$$

Where:

P_s = useful thermal energy of the steam, measured relative to ISO conditions, not used to generate additional electric or mechanical output, in MW,
Q = measured steam flow rate in lb/h,
H = enthalpy of the steam at measured temperature and pressure relative to ISO conditions, in Btu/lb, and 3.413 x 106 = conversion from Btu/h to MW.
Po = other useful heat recovery, measured relative to ISO conditions, not used for steam generation or performance enhancement of the combustion turbine.

(3) For mechanical drive applications complying with the output-based standard, use the following equation:

$$E = \frac{(NO_X)_m}{BL * AL} \qquad \text{(Eq. 4)}$$

Where:

E = NO_X emission rate in lb/MWh,
$(NO_X)_m$ = NO_X emission rate in lb/h,
BL = manufacturer's base load rating of turbine, in MW, and
AL = actual load as a percentage of the base load.

(g) For simple cycle units without heat recovery, use the calculated hourly average emission rates from paragraph (f) of this section to assess excess emissions on a 4-hour rolling average basis, as described in 40 CFR 60.4380(b)(1).

(h) For combined cycle and combined heat and power units with heat recovery, use the calculated hourly average emission rates from paragraph (f) of this section to assess excess emissions on a 30 unit operating day rolling average basis, as described in 40 CFR 60.4380(b)(1).

40 CFR 60.4355 How do I establish and document a proper parameter monitoring plan?

(a) The steam or water to fuel ratio or other parameters that are continuously monitored as described in 40 CFR 60.4335 and 40 CFR 60.4340 must be monitored during the performance test required under 40 CFR 60.8, to establish acceptable values and ranges. You may supplement the performance test data with engineering analyses, design specifications, manufacturer's recommendations and other relevant information to define the acceptable parametric ranges more precisely. You must develop and keep on-site a parameter monitoring plan which explains the procedures used to document proper operation of the NO_X emission controls. The plan must:

(1) Include the indicators to be monitored and show there is a significant relationship to emissions and proper operation of the NO_X emission controls,

(2) Pick ranges (or designated conditions) of the indicators, or describe the process by which such range (or designated condition) will be established,

(3) Explain the process you will use to make certain that you obtain data that are representative of the emissions or parameters being monitored (such as detector location, installation specification if applicable),

(4) Describe quality assurance and control practices that are adequate to ensure the continuing validity of the data,

(5) Describe the frequency of monitoring and the data collection procedures which you will use (e.g., you are using a computerized data acquisition over a number of discrete data points with the average (or maximum value) being used for purposes of determining whether an exceedance has occurred), and

(6) Submit justification for the proposed elements of the monitoring. If a proposed performance specification differs from manufacturer recommendation, you must explain the reasons for the differences. You must submit the data supporting the justification, but you may refer to generally available sources of information used to support the justification. You may rely on engineering assessments and other data, provided you demonstrate factors which assure compliance or explain why performance testing is unnecessary to establish indicator ranges. When establishing indicator ranges, you may choose to simplify the process by treating the parameters as if they were correlated. Using this assumption, testing can be divided into two cases:

(i) All indicators are significant only on one end of range (e.g., for a thermal incinerator controlling volatile organic compounds (VOC) it is only important to insure a minimum temperature, not a maximum). In this case, you may conduct your study so that each parameter is at the significant limit of its range while you conduct your emissions testing. If the emissions tests show that the source is in compliance at the significant limit of each parameter, then as long as each parameter is within its limit, you are presumed to be in compliance.

(ii) Some or all indicators are significant on both ends of the range. In this case, you may conduct your study so that each parameter that is significant at both ends of its range assumes its extreme values in all possible combinations of the extreme values (either single or double) of all of the other parameters. For example, if there were only two parameters, A and B, and A had a range of values while B had only a minimum value, the combinations would be A high with B minimum and A low with B minimum. If both A and B had a range, the combinations would be A high and B high, A low and B low, A high and B low, A low and B high. For the case of four parameters all having a range, there are 16 possible combinations.

(b) For affected units that are also subject to part 75 of 40 CFR and that have state approval to use the low mass emissions methodology in 40 CFR 75.19 or the NO_X emission measurement methodology in appendix E to 40 CFR 75, you may meet the requirements of this paragraph by developing and keeping on-site (or at a central location for unmanned facilities) a QA plan, as described in 40 CFR 75.19(e)(5) or in section 2.3 of appendix E to part 75 of 40 CFR and section 1.3.6 of appendix B to part 75 of 40 CFR.

40 CFR 60.4360 How do I determine the total sulfur content of the turbine's combustion fuel?

You must monitor the total sulfur content of the fuel being fired in the turbine, except as provided in 40 CFR 60.4365. The sulfur content of the fuel must be determined using total sulfur methods described in 40 CFR 60.4415. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than half the applicable limit, ASTM D4084, D4810, D5504, or D6228, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see 40 CFR 60.17), which measure the major sulfur compounds, may be used.

40 CFR 60.4365 How can I be exempted from monitoring the total sulfur content of the fuel?

You may elect not to monitor the total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for units located in continental areas and 180 ng SO_2/J (0.42 lb SO_2/MMBtu) heat input for units located in noncontinental areas or a continental area that the Administrator determines does not have access to natural gas and that the removal of sulfur compounds would cause more environmental harm than benefit. You must use one of the following sources of information to make the required demonstration:

(a) The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for oil use in continental areas is 0.05 weight percent (500 ppmw) or less and 0.4 weight percent (4,000 ppmw) or less for noncontinental areas, the total sulfur content for natural gas use in continental areas is 20 grains of sulfur or less per 100 standard cubic feet and 140 grains of sulfur or less per 100 standard cubic feet for noncontinental areas, has potential sulfur emissions of less than less than 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for continental areas and has potential sulfur emissions of less than less than 180 ng SO_2/J (0.42 lb SO_2/MMBtu) heat input for noncontinental areas; or

(b) Representative fuel sampling data which show that the sulfur content of the fuel does not exceed 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for continental areas or 180 ng SO_2/J (0.42 lb SO_2/MMBtu) heat input for noncontinental areas. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of 40 CFR is required.

40 CFR 60.4370 How often must I determine the sulfur content of the fuel?

The frequency of determining the sulfur content of the fuel must be as follows:

(a) Fuel oil. For fuel oil, use one of the total sulfur sampling options and the associated sampling frequency described in sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of appendix D to part 75 of 40 CFR (i.e., flow proportional sampling, daily sampling, sampling from the unit's storage tank after each addition of fuel to the tank, or sampling each delivery prior to combining it with fuel oil already in the intended storage tank).

(b) Gaseous fuel. If you elect not to demonstrate sulfur content using options in 40 CFR 60.4365, and the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined and recorded once per unit operating day.

(c) Custom schedules. Notwithstanding the requirements of paragraph (b) of this section, operators or fuel vendors may develop custom schedules for determination of the total sulfur content of gaseous fuels, based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in paragraphs (c)(1) and (c)(2) of this section, custom schedules shall be substantiated with data and shall be approved by the Administrator before they can be used to comply with the standard in 40 CFR 60.4330.

(1) The two custom sulfur monitoring schedules set forth in paragraphs (c)(1)(i) through (iv) and in paragraph (c)(2) of this section are acceptable, without prior Administrative approval:

(i) The owner or operator shall obtain daily total sulfur content measurements for 30 consecutive unit operating days, using the applicable methods specified in this subpart. Based on the results of the 30 daily samples, the required frequency for subsequent monitoring of the fuel's total sulfur content shall be as specified in paragraph (c)(1)(ii), (iii), or (iv) of this section, as applicable.

(ii) If none of the 30 daily measurements of the fuel's total sulfur content exceeds half the applicable standard, subsequent sulfur content monitoring may be performed at 12-month intervals. If any of the samples taken at 12-month intervals has a total sulfur content greater than half but less than the applicable limit, follow the procedures in paragraph (c)(1)(iii) of this section. If any measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section.

(iii) If at least one of the 30 daily measurements of the fuel's total sulfur content is greater than half but less than the applicable limit, but none exceeds the applicable limit, then:

(A) Collect and analyze a sample every 30 days for 3 months. If any sulfur content measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section. Otherwise, follow the procedures in paragraph (c)(1)(iii)(B) of this section.

(B) Begin monitoring at 6-month intervals for 12 months. If any sulfur content measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section. Otherwise, follow the procedures in paragraph (c)(1)(iii)(C) of this section.

(C) Begin monitoring at 12-month intervals. If any sulfur content measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section. Otherwise, continue to monitor at this frequency.

(iv) If a sulfur content measurement exceeds the applicable limit, immediately begin daily monitoring according to paragraph (c)(1)(i) of this section. Daily monitoring shall continue until 30 consecutive daily samples, each having a sulfur content no greater than the applicable limit, are obtained. At that point, the applicable procedures of paragraph (c)(1)(ii) or (iii) of this section shall be followed.

(2) The owner or operator may use the data collected from the 720-hour sulfur sampling demonstration described in section 2.3.6 of appendix D to part 75 of 40 CFR to determine a custom sulfur sampling schedule, as follows:

(i) If the maximum fuel sulfur content obtained from the 720 hourly samples does not exceed 20 grains/100 scf, no additional monitoring of the sulfur content of the gas is required, for the purposes of this subpart.

(ii) If the maximum fuel sulfur content obtained from any of the 720 hourly samples exceeds 20 grains/100 scf, but none of the sulfur content values (when converted to weight percent sulfur) exceeds half the applicable limit, then the minimum required sampling frequency shall be one sample at 12 month intervals.

(iii) If any sample result exceeds half the applicable limit, but none exceeds the applicable limit, follow the provisions of paragraph (c)(1)(iii) of this section.

(iv) If the sulfur content of any of the 720 hourly samples exceeds the applicable limit, follow the provisions of paragraph (c)(1)(iv) of this section.

Reporting

40 CFR 60.4375 What reports must I submit?

(a) For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this subpart, you must submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c). Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.

(b) For each affected unit that performs annual performance tests in accordance with 40 CFR 60.4340(a), you must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.

40 CFR 60.4380 How are excess emissions and monitor downtime defined for NO_X?

For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions and monitor downtime that must be reported are defined as follows:

(a) For turbines using water or steam to fuel ratio monitoring:

(1) An excess emission is any unit operating hour for which the 4-hour rolling average steam or water to fuel ratio, as measured by the continuous monitoring system, falls below the acceptable steam or water to fuel ratio needed to demonstrate compliance with 40 CFR 60.4320, as established during the performance test required in 40 CFR 60.8. Any unit operating hour in which no water or steam is injected into the turbine when a fuel is being burned that requires water or steam injection for NO_X control will also be considered an excess emission.

(2) A period of monitor downtime is any unit operating hour in which water or steam is injected into the turbine, but the essential parametric data needed to determine the steam or water to fuel ratio are unavailable or invalid.

(3) Each report must include the average steam or water to fuel ratio, average fuel consumption, and the combustion turbine load during each excess emission.

(b) For turbines using continuous emission monitoring, as described in 40 CFR 60.4335(b) and 40 CFR 60.4345:

(1) An excess emissions is any unit operating period in which the 4-hour or 30-day rolling average NO_X emission rate exceeds the applicable emission limit in 40 CFR 60.4320. For the purposes of this subpart, a ``4-hour rolling average NO_X emission rate" is the arithmetic average of the average NO_X emission rate in ppm or ng/J (lb/MWh) measured by the continuous emission monitoring equipment for a given hour and the three unit operating hour average NO_X emission rates immediately preceding that unit operating hour. Calculate the rolling average if a valid NO_X emission rate is obtained for at least 3 of the 4 hours. For the purposes of this subpart, a ``30-day rolling average NO_X emission rate" is the arithmetic average of all hourly NO_X emission data in ppm or ng/J (lb/MWh) measured by the continuous emission monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30-day average is calculated each unit operating day as the average of all hourly NO_X emissions rates for the preceding 30 unit operating days if a valid NO_X emission rate is obtained for at least 75 percent of all operating hours.

(2) A period of monitor downtime is any unit operating hour in which the data for any of the following parameters are either missing or invalid: NO_X concentration, CO_2 or O_2 concentration, fuel flow rate, steam flow rate, steam temperature, steam pressure, or megawatts. The steam flow rate, steam temperature, and steam pressure are only required if you will use this information for compliance purposes.

(3) For operating periods during which multiple emissions standards apply, the applicable standard is the average of the applicable standards during each hour. For hours with multiple emissions standards, the applicable limit for that hour is determined based on the condition that corresponded to the highest emissions standard.

(c) For turbines required to monitor combustion parameters or parameters that document proper operation of the NO_X emission controls:

(1) An excess emission is a 4-hour rolling unit operating hour average in which any monitored parameter does not achieve the target value or is outside the acceptable range defined in the parameter monitoring plan for the unit.

(2) A period of monitor downtime is a unit operating hour in which any of the required parametric data are either not recorded or are invalid.

40 CFR 60.4385 How are excess emissions and monitoring downtime defined for SO_2?

If you choose the option to monitor the sulfur content of the fuel, excess emissions and monitoring downtime are defined as follows:

(a) For samples of gaseous fuel and for oil samples obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for

(a) which the sulfur content of the fuel being fired in the combustion turbine exceeds the applicable limit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit.

(b) If the option to sample each delivery of fuel oil has been selected, you must immediately switch to one of the other oil sampling options (i.e., daily sampling, flow proportional sampling, or sampling from the unit's storage tank) if the sulfur content of a delivery exceeds 0.05 weight percent. You must continue to use one of the other sampling options until all of the oil from the delivery has been combusted, and you must evaluate excess emissions according to paragraph (a) of this section. When all of the fuel from the delivery has been burned, you may resume using the as-delivered sampling option.

(c) A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour of a required sample, if invalid results are obtained. The period of monitor downtime ends on the date and hour of the next valid sample.

40 CFR 60.4390 What are my reporting requirements if I operate an emergency combustion turbine or a research and development turbine?

(a) If you operate an emergency combustion turbine, you are exempt from the NO_X limit and must submit an initial report to the Administrator stating your case.

(b) Combustion turbines engaged by manufacturers in research and development of equipment for both combustion turbine emission control techniques and combustion turbine efficiency improvements may be exempted from the NO_X limit on a case-by-case basis as determined by the Administrator. You must petition for the exemption.

40 CFR 60.4395 When must I submit my reports?

All reports required under 40 CFR 60.7(c) must be postmarked by the 30th day following the end of each 6-month period.

Performance Tests

40 CFR 60.4400 How do I conduct the initial and subsequent performance tests, regarding NO_X?

(a) You must conduct an initial performance test, as required in 40 CFR 60.8. Subsequent NO_X performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test).

(1) There are two general methodologies that you may use to conduct the performance tests. For each test run:

(i) Measure the NO_X concentration (in parts per million (ppm)), using EPA Method 7E or EPA Method 20 in appendix A of 40 CFR 60. For units complying with the output based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in appendix A of 40 CFR 60, and measure and record the electrical and thermal output from the unit. Then, use the following equation to calculate the NO_X emission rate:

$$E = \frac{1.194X10^{-7} * (NO_X)_c * Q_{std}}{P} \qquad \text{(Eq. 5)}$$

Where:

E = NO_X emission rate, in lb/MWh

1.194 x 10^{-7} = conversion constant, in lb/dscf-ppm

$(NO_X)_c$ = average NO_X concentration for the run, in ppm

Q_{std} = stack gas volumetric flow rate, in dscf/hr

P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to 40 CFR 60.4350(f)(2); or

(ii) Measure the NO_X and diluent gas concentrations, using either EPA Methods 7E and 3A, or EPA Method 20 in appendix A of 40 CFR 60. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A of 40 CFR 60 to calculate the NO_X emission rate in lb/MMBtu. Then, use Equations 1 and, if necessary, 2 and 3 in 40 CFR 60.4350(f) to calculate the NO_X emission rate in lb/MWh.

(2) Sampling traverse points for NO_X and (if applicable) diluent gas are to be selected following EPA Method 20 or EPA Method 1 (non-particulate procedures), and sampled for equal time intervals. The sampling must be performed with a traversing single-hole probe, or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points.

(3) Notwithstanding paragraph (a)(2) of this section, you may test at fewer points than are specified in EPA Method 1 or EPA Method 20 in appendix A of 40 CFR 60 if the following conditions are met:

(i) You may perform a stratification test for NO_X and diluent pursuant to

(A) [Reserved], or

(B) The procedures specified in section 6.5.6.1(a) through (e) of appendix A of part 75 of 40 CFR.

(ii) Once the stratification sampling is completed, you may use the following alternative sample point selection criteria for the performance test:

(A) If each of the individual traverse point NO_X concentrations is within 10 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than 5ppm or 0.5 percent CO_2 (or O_2) from the mean for all traverse points, then you may use three points (located either 16.7, 50.0 and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The three points must be located along the measurement line that exhibited the highest average NO_X concentration during the stratification test; or

(B) For turbines with a NO_X standard greater than 15 ppm @ 15% O_2, you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_X concentrations is within 5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than 3ppm or 0.3 percent CO_2 (or O_2) from the mean for all traverse points; or

(C) For turbines with a NO_X standard less than or equal located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_X concentrations is within 2.5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than 1ppm or 0.15 percent CO_2 (or O_2) from the mean for all traverse points.

(b) The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. You may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. You must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.

(1) If the stationary combustion turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel.

(2) For a combined cycle and CHP turbine systems with supplemental heat (duct burner), you must measure the total NO_X emissions after the duct burner rather than directly after the turbine. The duct burner must be in operation during the performance test.

(3) If water or steam injection is used to control NO_X with no additional post-combustion NO_X control and you choose to monitor the steam or water to fuel ratio in accordance with 40 CFR 60.4335, then that monitoring system must be operated concurrently with each EPA Method 20 or EPA Method 7E run and must be used to determine the fuel consumption and the steam or water to fuel ratio necessary to comply with the applicable 40 CFR 60.4320 NO_X emission limit.

(4) Compliance with the applicable emission limit in 40 CFR 60.4320 must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO_X emission rate at each tested level meets the applicable emission limit in 40 CFR 60.4320.

(5) If you elect to install a CEMS, the performance evaluation of the CEMS may either be conducted separately or (as described in 40 CFR 60.4405) as part of the initial performance test of the affected unit.

(6) The ambient temperature must be greater than 0 degrees F during the performance test.

40 CFR 60.4405 How do I perform the initial performance test if I have chosen to install a NO_X-diluent CEMS?

If you elect to install and certify a NO_X-diluent CEMS under 40 CFR 60.4345, then the initial performance test required under 40 CFR 60.8 may be performed in the following alternative manner:

(a) Perform a minimum of nine RATA reference method runs, with a minimum time per run of 21 minutes, at a single load level, within plus or minus 25 percent of 100 percent of peak load. The ambient temperature must be greater than 0 [deg]F during the RATA runs.

(b) For each RATA run, concurrently measure the heat input to the unit using a fuel flow meter (or flow meters) and measure the electrical and thermal output from the unit.

(c) Use the test data both to demonstrate compliance with the applicable NOX emission limit under 40 CFR 60.4320 and to provide the required reference method data for the RATA of the CEMS described under 40 CFR 60.4335.

(d) Compliance with the applicable emission limit in 40 CFR 60.4320 is achieved if the arithmetic average of all of the NO_X emission rates for the RATA runs, expressed in units of ppm or lb/MWh, does not exceed the emission limit.

40 CFR 60.4410 How do I establish a valid parameter range if I have chosen to continuously monitor parameters?

If you have chosen to monitor combustion parameters or parameters indicative of proper operation of NO_X emission controls in accordance with 40 CFR 60.4340, the appropriate parameters must be continuously monitored and recorded during each run of the initial performance test, to establish acceptable operating ranges, for purposes of the parameter monitoring plan for the affected unit, as specified in 40 CFR 60.4355.

40 CFR 60.4415 How do I conduct the initial and subsequent performance tests for sulfur?

(a) You must conduct an initial performance test, as required in 40 CFR 60.8. Subsequent SO_2 performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). There are three methodologies that you may use to conduct the performance tests.

(1) If you choose to periodically determine the sulfur content of the fuel combusted in the turbine, a representative fuel sample would be collected following ASTM D5287 (incorporated by reference, see 40 CFR 60.17) for natural gas or ASTM D4177 (incorporated by reference, see 40 CFR 60.17) for oil. Alternatively, for oil, you may follow the procedures for manual pipeline sampling in section 14 of ASTM D4057 (incorporated by reference, see 40 CFR 60.17). The fuel analyses of this section may be performed either by you, a service contractor retained by you, the fuel vendor, or any other qualified agency. Analyze the samples for the total sulfur content of the fuel using:

(i) For liquid fuels, ASTM D129, or alternatively D1266, D1552, D2622, D4294, or D5453 (all of which are incorporated by reference, see 40 CFR 60.17); or

(ii) For gaseous fuels, ASTM D1072, or alternatively D3246, D4084, D4468, D4810, D6228, D6667, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see 40 CFR 60.17).

(2) Measure the SO_2 concentration (in parts per million (ppm)), using EPA Methods 6, 6C, 8, or 20 in appendix A of 40 CFR 60. In addition, the American Society of Mechanical Engineers (ASME) standard, ASME PTC 19-10-1981-Part 10, ``Flue and Exhaust Gas Analyses," manual methods for sulfur dioxide (incorporated by reference, see 40 CFR 60.17) can be used instead of EPA Methods 6 or 20. For units complying with the output based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in appendix A of 40 CFR 60, and measure and record the electrical and thermal output from the unit. Then use the following equation to calculate the SO_2 emission rate:

$$E = \frac{1.664X10^{-7} * (SO_2)_c * Q_{std}}{P} \qquad \text{(Eq. 6)}$$

Where:

E = SO_2 emission rate, in lb/MWh

1.664 x 10^{-7} = conversion constant, in lb/dscf-ppm

$(SO_2)_c$ = average SO_2 concentration for the run, in ppm

Q_{std} = stack gas volumetric flow rate, in dscf/hr

P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to 40 CFR 60.4350(f)(2); or

(3) Measure the SO_2 and diluent gas concentrations, using either EPA Methods 6, 6C, or 8 and 3A, or 20 in appendix A of 40 CFR 60. In addition, you may use the manual methods for sulfur dioxide ASME PTC 19-10-1981-Part 10 (incorporated by reference, see 40 CFR 60.17). Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A of 40 CFR 60 to calculate the SO_2 emission rate in lb/MMBtu. Then, use Equations 1 and, if necessary, 2 and 3 in 40 CFR 60.4350(f) to calculate the SO2 emission rate in lb/MWh.

(b) [Reserved]

Definitions

40 CFR 60.4420 What definitions apply to this subpart?

As used in this subpart, all terms not defined herein will have the meaning given them in the Clean Air Act and in subpart A (General Provisions) of 40 CFR 60.

Combined cycle combustion turbine means any stationary combustion turbine which recovers heat from the combustion turbine exhaust gases to generate steam that is only used to create additional power output in a steam turbine.

Combined heat and power combustion turbine means any stationary combustion turbine which recovers heat from the exhaust gases to heat water or another medium, generate steam for useful purposes other than additional electric generation, or directly uses the heat in the exhaust gases for a useful purpose.

Combustion turbine model means a group of combustion turbines having the same nominal air flow, combustor inlet pressure, combustor inlet temperature, firing temperature, turbine inlet temperature and turbine inlet pressure.

Combustion turbine test cell/stand means any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) combustion turbines.

Diffusion flame stationary combustion turbine means any stationary combustion turbine where fuel and air are injected at the combustor and are mixed only by diffusion prior to ignition.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source, such as a stationary combustion turbine, internal combustion engine, kiln, etc., to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a heat recovery steam generating unit.

Efficiency means the combustion turbine manufacturer's rated heat rate at peak load in terms of heat input per unit of power output--based on the higher heating value of the fuel.

Emergency combustion turbine means any stationary combustion turbine which operates in an emergency situation. Examples include stationary combustion turbines used to produce power for critical networks or equipment, including power supplied to portions of a facility, when electric power from the local utility is interrupted, or stationary combustion turbines used to pump water in the case of fire or flood, etc. Emergency stationary combustion turbines do not include stationary combustion turbines used as peaking units at electric utilities or stationary combustion turbines at industrial facilities that typically operate at low capacity factors. Emergency combustion turbines may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are required by the manufacturer, the vendor, or the insurance company associated with the turbine. Required testing of such units should be minimized, but there is no time limit on the use of emergency combustion turbines.

Excess emissions means a specified averaging period over which either (1) the NO_X emissions are higher than the applicable emission limit in 40 CFR 60.4320; (2) the total sulfur content of the fuel being combusted in the affected facility exceeds the limit specified in 40 CFR 60.4330; or (3) the recorded value of a particular monitored parameter is outside the acceptable range specified in the parameter monitoring plan for the affected unit.

Gross useful output means the gross useful work performed by the stationary combustion turbine system. For units using the mechanical energy directly or generating only electricity, the gross useful work performed is the gross electrical or mechanical output from the turbine/generator set. For combined heat and power units, the gross useful work performed is the gross electrical or mechanical output plus the useful thermal output (i.e., thermal energy delivered to a process).

Heat recovery steam generating unit means a unit where the hot exhaust gases from the combustion turbine are routed in order to extract heat from the gases and generate steam, for use in a steam turbine or other device that utilizes steam. Heat recovery steam generating units can be used with or without duct burners.

Integrated gasification combined cycle electric utility steam generating unit means a coal-fired electric utility steam generating unit that burns a synthetic gas derived from coal in a combined-cycle gas turbine. No solid coal is directly burned in the unit during operation.

ISO conditions means 288 Kelvin, 60 percent relative humidity and 101.3 kilopascals pressure.

Lean premix stationary combustion turbine means any stationary combustion turbine where the air and fuel are thoroughly mixed to form a lean mixture before delivery to the combustor. Mixing may occur before or in the combustion chamber. A lean premixed turbine may operate in diffusion flame mode during operating conditions such as startup and shutdown, extreme ambient temperature, or low or transient load.

Natural gas means a naturally occurring fluid mixture of hydrocarbons (e.g., methane, ethane, or propane) produced in geological formations beneath the Earth's surface that maintains a gaseous state at standard atmospheric temperature and pressure under ordinary conditions. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1,100 British thermal units (Btu) per standard cubic foot. Natural gas does not include the following gaseous fuels: landfill gas, digester gas, refinery gas, sour gas, blast furnace gas, coal-derived gas, producer gas, coke oven gas, or any gaseous fuel produced in a process which might result in highly variable sulfur content or heating value.

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, the Northern Mariana Islands, or offshore platforms.

Peak load means 100 percent of the manufacturer's design capacity of the combustion turbine at ISO conditions.

Regenerative cycle combustion turbine means any stationary combustion turbine which recovers heat from the combustion turbine exhaust gases to preheat the inlet combustion air to the combustion turbine.

Simple cycle combustion turbine means any stationary combustion turbine which does not recover heat from the combustion turbine exhaust gases to preheat the inlet combustion air to the combustion turbine, or which does not recover heat from the combustion turbine exhaust gases for purposes other than enhancing the performance of the combustion turbine itself.

Stationary combustion turbine means all equipment, including but not limited to the turbine, the fuel, air, lubrication and exhaust gas systems, control systems (except emissions control equipment), heat recovery system, and any ancillary components and sub-components comprising any simple cycle stationary combustion turbine, any regenerative/recuperative cycle stationary combustion turbine, any combined cycle combustion turbine, and any combined heat and power combustion turbine based system. Stationary means that the combustion turbine is not self propelled or intended to be propelled while performing its function. It may, however, be mounted on a vehicle for portability.

Unit operating day means a 24-hour period between 12 midnight and the following midnight during which any fuel is combusted at any time in the unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Unit operating hour means a clock hour during which any fuel is combusted in the affected unit. If the unit combusts fuel for the entire clock hour, it is considered to be a full unit operating hour. If the unit combusts fuel for only part of the clock hour, it is considered to be a partial unit operating hour.

Useful thermal output means the thermal energy made available for use in any industrial or commercial process, or used in any heating or cooling application, i.e., total thermal energy made available for processes and applications other than electrical or mechanical generation. Thermal output for this subpart means the energy in recovered thermal output measured against the energy in the thermal output at 15 degrees Celsius and 101.325 kilopascals of pressure.

Table 1.--to Subpart KKKK of Part 60.--Nitrogen Oxide Emission Limits for New Stationary Combustion Turbines

Combustion turbine type	Combustion turbine heat input at peak load (HHV)	NO_X emission standard
New turbine firing natural gas, electric generating.	≤50 MMBtu/h	42 ppm at 15 percent O_2 or 290 ng/J of useful output (2.3 lb/MWh).
New turbine firing natural gas, mechanical drive.	≤50 MMBtu/h	100 ppm at 15 percent O_2 or 690 ng/J of useful output (5.5 lb/ MWh).
New turbine firing natural gas.	> 50 MMBtu/h and ≤ 850 MMBtu/h.	25 ppm at 15 percent O_2 or 150 ng/J of useful output (1.2 lb/MWh).
New, modified, or reconstructed turbine firing natural gas.*	**> 850 MMBtu/h.**	**15 ppm at 15 percent O_2 or 54 ng/J of useful output (0.43 lb/MWh).**
New turbine firing fuels other than natural gas, electric generating.	≤50 MMBtu/h	96 ppm at 15 percent O_2 or 700 ng/J of useful output (5.5 lb/MWh).
New turbine firing fuels other than natural gas, mechanical drive.	≤50 MMBtu/h	150 ppm at 15 percent O_2 or 1,100 ng/J of useful output (8.7 lb/ MWh).
New turbine firing fuels other than natural gas.	> 50 MMBtu/h and ≤ 850 MMBtu/h.	74 ppm at 15 percent O_2 or 460 ng/J of useful output (3.6 lb/MWh).
New, modified, or reconstructed turbine firing fuels other than natural gas.	> 850 MMBtu/h.	42 ppm at 15 percent O_2 or 160 ng/J of useful output (1.3 lb/MWh).
Modified or reconstructed turbine.	≤50 MMBtu/h	150 ppm at 15 percent O_2 or 1,100 ng/J of useful output (8.7 lb/ MWh).
Modified or reconstructed turbine firing natural gas.	> 50 MMBtu/h and ≤ 850 MMBtu/h.	42 ppm at 15 percent O_2 or 250 ng/J of useful output (2.0 lb/MWh).
Modified or reconstructed turbine firing fuels other than natural gas.	> 50 MMBtu/h and ≤ 850 MMBtu/h.	96 ppm at 15 percent O_2 or 590 ng/J of useful output (4.7 lb/MWh).
Turbines located north of the Arctic Circle (latitude66.5 degrees north), turbines operating at less than 75 percent of peak load, modified and reconstructed offshore turbines, and turbine operating at temperatures less than 0°F.	≤ 30 MW output	150 ppm at 15 percent O_2 or 1,100 ng/J of useful output (8.7 lb/ MWh).
	> 30 MW output	96 ppm at 15 percent O_2 or 590 ng/J of useful output (4.7 lb/MWh).
Heat recovery units operating independent of the combustion turbine.	All sizes	54 ppm at 15 percent O_2 or 110 ng/J of useful output (0.86 lb/MWh).

*** Combustion turbine class applicable to Orlando Cogen**

FINAL DETERMINATION

PERMITTEE

Northern Star Generation Services
Orlando Cogen Limited, L.P.
8275 Exchange drive
Orlando, Florida 32809

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road, MS# 5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0950203-007-AC
Orlando Cogen Plant

The existing facility consists of a natural gas-fired combined cycle unit. The combined cycle unit includes: a combustion turbine-electrical generator (CT); a heat recovery steam generator (HRSG) with a duct burner (DB) system; and a nominal 50 megawatts (MW) steam turbine-electrical generator (ST).

This construction permit authorizes the applicant to replace the rotor (power) section of the CT and to physically upgrade it from an Alstom Model GT 11NM to a Model GT 11NMC by replacement of key components in the compressor section of the CT with improved ones. This upgrade will increase the nominal power rating of the CT as a result of the present and previous projects from 79 to 86.8 MW at the International Standards Organization (ISO) conditions of 59 degrees Fahrenheit and 1 atmosphere of pressure. The total power rating of the combined cycle unit including the CT, HRSG, and ST is 136.8 MW.

As a result of this upgrade project, the combined cycle unit becomes subject to the Standards of Performance for Stationary Combustion Turbines at 40 Code of Federal Regulations Part 60, Subpart KKKK.

The project is largely an efficiency improvement and will allow production of additional electricity with little or no increase in fuel use. The applicant projected that emissions will not significantly increase after completion of the project compared with historical baseline actual emissions. Therefore, the project is not subject to the rules for the Prevention of Significant Deterioration (PSD) at Section 62-212.400 of the Florida Administrative Code (F.A.C.) or a determination of best available control technology.

NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on November 20, 2007. The applicant published the "Public Notice of Intent to Issue" in the Stuart News on December 1, 2007 with proof of publication received by the Department on December 7, 2007. Comments on the draft construction permit were received from the applicant on December 21, 2007. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. No comments were received from EPA Region 4, or the public at large on the Intent to Issue the Air Construction Permit package. Minor comments were received from the applicant and are summarized below.

- Specific Condition 7 (page 5) the NO_x limits in the table should be revised as follows:
  - The limit for the CT, and CT/DB should have a 24-hour rolling average.
  - The limit for the DB only should be determined by annual testing.

Response: The Department agrees with this comment. The testing requirements listed in the table were clarified to indicated that the NO_x testing requirements for the stand alone DB are on an annual basis. In addition, it was also clarified that the 24 hour rolling average NO_x emission limits for the CT and CT/DB specified in the original PSD permit in the table are on a pound per hour (lb/hr) basis. Additionally, as a result of this turbine upgrade project the CT, HRSG, and DB system are subject to the NO_x emission limit of 15 part per million (ppm) at 15% oxygen(O_2) on a 30 day rolling average as specified in 40 CFR 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines.

- Specific Condition 3 (page 4) indicates that the DB is subject to NSPS Subpart Dc when it is actually subject to Subpart Db.

  Response: The Department agrees with this comment and this correction has been made in the final permit.

- Note 4 of Table 1(page 5) states that the heat input rate is 890 MMBtu/hr. This number should be 980 MMBtu hr as was requested in the permit application.

  Response: The department agrees with this comment. The heat input rate indicated in this note of Table 1 was not changed in the draft permit as requested in the application. This correction has been made in the final permit.

- Specific Condition 11(page 6) the baseline emissions for NO_x should be 233 TPY not 232 TPY.

  Response: The department agrees with this comment. This correction has been made in the final permit.

  In addition to the comments listed above, the applicant requested that the specific conditions in the current Title V operating permit (0950203-006-AV) be changed to reflect the emission changes authorized by this construction permit. These changes will be made once the applicant submits an application to revise their current Title V operating permit. Finally, a clarification of the NO_x emission limits for the CT and CT/DB was added to Table 1 of the final construction permit. This clarification addresses the fact that the NO_x emission limits for the CT and CT/DB are on a pound per hour (lb/hr) basis as described in Specific Condition 13 of the original PSD permit (PSD-FL-184).

CONCLUSION

The final action of the Department is to issue the air construction permit with changes indicated above.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Air Permit by:

Mr. Jim Murray, Plant Manager
Northern Star Generation Services
8275 Exchange Drive
Orlando, Florida 32809

DEP File No. 0950203-007-AC
Orlando Cogen Limited, L.P
GT 11NMC Turbine Upgrade Project
Orange County

/

Enclosed is the Final Permit Number 0950203-007-AC authorizing the applicant to replace the rotor (power) section of the combustion turbine electrical generator (CT) and to physically upgrade it from an Alstom Model GT 11NM to a Model GT 11NMC by replacing key components in the compressor section of the CT with improved ones. This upgrade will increase the nominal power rating of the CT as a result of the present and previous projects from 79 to 86.8 megawatts (MW) at the International Standards Organization (ISO) conditions of 59 degrees Fahrenheit and 1 atmosphere of pressure. The total power rating of the combined cycle unit including the CT; a heat recovery steam generator (HRSG) with a duct burner (DB) system; and a nominal 50 megawatts (MW) steam turbine-electrical generator (ST) is 136.8 MW.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) and all copies were sent electronically (with Received Receipt Requested) before the close of business on 2/7/08 to the person(s) listed:

Mr. Jim Murray, Northern Star: jim.murray@northernstargen.com
Mr. Dave Kellermeyer, Northern Star: davekellermeyer@northernstargen.com
Mr. Scott Osbourn, P.E., Golder Associates: sosbourn@golder.com
Jim Bradner, DEP CD: james.bradner@dep.state.fl.us
Lori Cunniff, Orange County EPD: lori.cunniff@ocfl.net
Jim Little, EPA Region 4: little.james@epamail.epa.gov
Katy Forney, EPA Region 4: forney.kathleen@epa.gov

Clerk Stamp

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

(Clerk) 2/7/08 (Date)

Memorandum

Florida Department of Environmental Protection

TO: Joseph Kahn, Director, Division of Air Resource Management

THROUGH: Trina Vielhauer, Chief, Bureau of Air Regulation

THROUGH: Al Linero AAL

FROM: David Read DLR

DATE: February 5, 2008

SUBJECT: Final Air Permit No. 0950203-007-AC
Northern Star Generation Services
Orlando Cogen Limited L.P.
GT 11NMC Turbine Upgrade Project

Attached for your review are the following items:

- Final Notice;
- Final Determination; and
- Final Permit.

The Final Determination explains the purpose of the project and the events since issuance of the Draft permit so we have not repeated these here. We recommend your approval of the attached final permit for this project.

Attachments

Harvey, Mary

From: Harvey, Mary
Sent: Thursday, February 07, 2008 1:28 PM
To: 'Mr. Jim Murray, Northern Star:'; 'Mr. Dave Kellermeyer, Northern Star:'; 'Mr. Scott Osbourn, P.E., Golder Associates:'; Bradner, James; 'Lori Cunniff, Orange County EPD:'; 'Jim Little, EPA Region 4:'; 'Katy Forney, EPA Region 4:'
Cc: Read, David; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL
Attachments: Orlando Cogen Limited, L.P. - Facility #0950203-007-AC-FINAL.pdf

Tracking:

Recipient	Delivery	Read
'Mr. Jim Murray, Northern Star:'		
'Mr. Dave Kellermeyer, Northern Star:'		
'Mr. Scott Osbourn, P.E., Golder Associates:'		
Bradner, James		Read: 2/7/2008 2:13 PM
'Lori Cunniff, Orange County EPD:'		
'Jim Little, EPA Region 4:'		
'Katy Forney, EPA Region 4:'		
Read, David		Read: 2/7/2008 1:28 PM
Walker, Elizabeth (AIR)	Delivered: 2/7/2008 1:28 PM	
Gibson, Victoria		

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

Harvey, Mary

From: Read, David
To: Harvey, Mary
Sent: Thursday, February 07, 2008 1:37 PM
Subject: Read: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Your message

To: Read, David
Subject: FW: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL
Sent: 2/7/2008 1:36 PM

was read on 2/7/2008 1:37 PM.

Harvey, Mary

From: Lori.Cunniff@ocfl.net
To: Harvey, Mary
Sent: Thursday, February 07, 2008 1:39 PM
Subject: Read: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Your message

To: Lori.Cunniff@ocfl.net
Subject:

was read on 2/7/2008 1:39 PM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Monday, February 11, 2008 4:55 PM
To: Harvey, Mary
Subject: Re: FW: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Attachments: Orlando Cogen Limited, L.P. - Facility #0950203-007-AC-FINAL.pdf

Orlando Cogen Limited, L.P. - ...

we got this one Mary. Thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30303

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary" <Mary.Harvey@dep.state.fl.us>
02/11/2008 04:19 PM

To: Kathleen Forney/R4/USEPA/US@EPA
cc:
Subject: FW: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Hi – I didn't get a read receipt on this.

Thanks
Mary

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Harvey, Mary
Sent: Thursday, February 07, 2008 1:45 PM
To: 'dave.kellermeyer@northernstargen.com'
Subject: FW: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Harvey, Mary

From: Osbourn, Scott [Scott_Osbourn@golder.com]
To: Harvey, Mary
Sent: Thursday, February 07, 2008 1:35 PM
Subject: Read: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Your message

To: Scott_Osbourn@golder.com
Subject:

was read on 2/7/2008 1:35 PM.

Harvey, Mary

From: Murray, Jim [jim.murray@northernstargen.com]
Sent: Thursday, February 07, 2008 2:14 PM
To: Harvey, Mary
Subject: RE: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

James T Murray
407-851-1350 ext.2022

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, February 07, 2008 1:28 PM
To: Murray, Jim; Mr. Dave Kellermeyer, Northern Star:; Mr. Scott Osbourn, P.E., Golder Associates:; Bradner, James; Lori Cunniff, Orange County EPD:; Jim Little, EPA Region 4:; Katy Forney, EPA Region 4:
Cc: Read, David; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

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Harvey, Mary

From: Bradner, James
Sent: Thursday, February 07, 2008 2:13 PM
To: Harvey, Mary
Subject: RE: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Received—thank you.

From: Harvey, Mary
Sent: Thursday, February 07, 2008 1:28 PM
To: 'Mr. Jim Murray, Northern Star:'; 'Mr. Dave Kellermeyer, Northern Star:'; 'Mr. Scott Osbourn, P.E., Golder Associates:'; Bradner, James; 'Lori Cunniff, Orange County EPD:'; 'Jim Little, EPA Region 4:'; 'Katy Forney, EPA Region 4:'
Cc: Read, David; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

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Thank you,

DEP, Bureau of Air Regulation

Harvey, Mary

From: Bradner, James
To: Harvey, Mary
Sent: Thursday, February 07, 2008 2:13 PM
Subject: Read: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Your message

To:	'Mr. Jim Murray, Northern Star:'; 'Mr. Dave Kellermeyer, Northern Star:'; 'Mr. Scott Osbourn, P.E., Golder Associates:'; Bradner, James; 'Lori Cunniff, Orange County EPD:'; 'Jim Little, EPA Region 4:'; 'Katy Forney, EPA Region 4:'
Cc:	Read, David; Walker, Elizabeth (AIR); Gibson, Victoria
Subject:	ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL
Sent:	2/7/2008 1:28 PM

was read on 2/7/2008 2:13 PM.

Harvey, Mary

From: Murray, Jim [jim.murray@northernstargen.com]
To: Harvey, Mary
Sent: Thursday, February 07, 2008 2:13 PM
Subject: Read: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Your message

To: jim.murray@northernstargen.com
Subject:

was read on 2/7/2008 2:13 PM.

Harvey, Mary

From: Lori.Cunniff@ocfl.net
Sent: Sunday, February 10, 2008 9:39 PM
To: Harvey, Mary
Subject: RE: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

Received

Lori Cunniff, Manager
Orange County Environmental Protection Division
800 Mercy Drive
Orlando, FL 32808
407-836-1405
Please consider the environment before printing this e-mail.

PLEASE NOTE: Florida has a very broad public records law (F. S. 119). All e-mails to and from County Officials are kept as a public record. Your e-mail communications, including your e-mail address may be disclosed to the public and media at any time.

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, February 07, 2008 1:28 PM
To: Mr. Jim Murray, Northern Star:; Mr. Dave Kellermeyer, Northern Star:; Mr. Scott Osbourn, P.E., Golder Associates:; Bradner, James; Cunniff, Lori; Jim Little, EPA Region 4:; Katy Forney, EPA Region 4:
Cc: Read, David; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

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Harvey, Mary

From: Kellermeyer, Dave [dave.kellermeyer@northernstargen.com]
Sent: Friday, February 08, 2008 8:23 AM
To: Harvey, Mary
Subject: RE: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, February 07, 2008 12:45 PM
To: Kellermeyer, Dave
Subject: FW: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

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From: Harvey, Mary
Sent: Thursday, February 07, 2008 1:28 PM
To: 'Mr. Jim Murray, Northern Star:'; 'Mr. Dave Kellermeyer, Northern Star:'; 'Mr. Scott Osbourn, P.E., Golder Associates:'; Bradner, James; 'Lori Cunniff, Orange County EPD:'; 'Jim Little, EPA Region 4:'; 'Katy Forney, EPA Region 4:'
Cc: Read, David; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: ORLANDO COGEN LIMITED, L.P. - DEP FILE #0950203-007-AC-FINAL

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NORTHERN STAR
GENERATION SERVICES
COMPANY LLC
Orlando Cogeneration Ltd.
8275 Exchange Drive
Orlando, FL 32809
Telephone: (407) 851-1350
Facsimile: (407) 851-1686

August 17, 2007

Mr. Jeff Koerner
FDEP/DARM
North Permitting Section
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Orlando Cogeneration Facility; Request for Heat Input Increase
Facility No. 0950203

Dear Mr. Koerner:

The enclosed air quality construction permit application package is submitted by Northern Star Generation Services Company LLC (Northern Star). Northern Star is the operating agent for Orlando CoGen Limited, L.P. ("Orlando CoGen"), owners of a 137 MW (nominal) natural gas fired cogeneration power plant in Orlando, Florida. This facility operates under the authority of Title V Air Operation Permit Number 0950203-006-AV, which has an effective date of January 24, 2006. This Title V permit expires on December 31, 2008, and a renewal application is due by July 5, 2008. Given the time constraints of this project, Northern Star is submitting a construction permit application. Northern Star is amenable to the concurrent procession of this application as a Title V renewal, if the Department has sufficient resources to meet our schedule. Should this situation be the case, Northern Star would provide the additional information required for the Title V renewal as a supplemental submittal upon request from the Department.

The enclosed permit application serves as a construction permit application to provide for an upgrade to the gas turbine compressor that will be performed as part of a scheduled end-of-life replacement of the gas turbine rotor. This change is considered a modification to the unit as it will potentially increase the short-term emission rates from the unit. The projected net emissions increase for all pollutants is less than the Prevention of Significant Deterioration (PSD) Significant Emission Rate (SER), hence this project is not subject to PSD permitting review.

This letter addresses the following items associated with this project:

- Background Information
- Project Description
- Emission Estimates
- Regulatory Review
- Requested Permit Conditions

BACKGROUND INFORMATION

The Orlando facility consists of a single Alstom (ABB) GT 11NM gas turbine in combined cycle operation. The exhaust from the gas turbine is directed into a heat recovery steam generator (HRSG) which is equipped with a duct burner. Both the gas turbine and duct burner are single fuel pipeline quality natural gas emission sources. The facility does not have dual fuel capability. Power output from the plant is delivered through the Progress Energy Florida (PEF) transmission grid along an existing 69

kV transmission line to two customers, PEF and Reedy Creek Improvement District (RCID). Power is sold to both customers under existing long-term power purchase agreements. The facility utilizes a steam absorption chiller to produce chilled water for the adjacent Air Products facility and maintains Federal Energy Regulatory Commission (FERC) Qualified Facility (QF) status. The power plant is a base load facility that has operated at a capacity factor averaging approximately 89% for the period 2001 through 2006.

The Orlando CoGen's Alstom GT 11N1 gas turbine has been in service since the start of plant operations in 1993. This gas turbine was upgraded to a GT 11NM in 2005. Orlando Cogen submitted a permit application to the DEP on February 22, 2005 to provide for this upgrade. It was not anticipated at that time that the turbine upgrade would require any increase in the permit limits. Subsequently, it was discovered that the GT 11NM turbine upgrade could allow additional firing of the unit and another permit application was filed on August 8, 2005 to revise the permitted capacity (as defined in Condition A.1 of the permit) from 856.9 MMBtu/hr (LHV, ISO) to 890 MMBtu/hr. The final revised Title V permit (Permit No. 0950203-006-AV) was issued on January 24, 2006.

PROJECT DESCRIPTION

A major scheduled maintenance outage is planned for March 2008. This outage is expected to last approximately 2-3 weeks. One of the major outage activities will be the normal, end-of-life replacement of the gas turbine rotor. Alstom has also recommended that Orlando Cogen replace the existing compressor section due to normal end-of-life issues within the next three years based on current operation. Based on this recommendation, Orlando Cogen has elected to replace the compressor section during the scheduled rotor replacement to minimize the impact on plant operations and utilize the opportunity provided during this replacement to upgrade the compressor section of the gas turbine. This upgrade to the GT 11 NMC will:

1. Increase gas turbine output by up to 10%;
2. Decrease the need to fire the duct burner; and,
3. Improve the overall plant efficiency.

The compressor upgrade will consist of the replacement of the following parts:

1. Row #1-17 compressor blades
2. Row #1-18 inlet compressor guide vanes
3. Stage #18 filler pieces

In addition, the work may include one upgraded blow off valve and startup piping with a motor-driven valve or modifications to the inlet bellmouth assembly. The use of these advanced blades will provide a performance enhancement that may result in an increase in gas turbine heat input under certain plant operating conditions.

The improved compressor blade design will result in an increase in compressor discharge pressure, which in turn produces an increase in the total mass flow through the turbine. The increase in air flow allows increased fuel firing and power output at approximately the same (or a slightly improved) heat rate. One advantage of this upgrade is that the additional power output from the gas turbine can greatly reduce (or in some situations eliminate) fuel firing in the duct burner.

The compressor upgrade would produce an increase of up to 10% in the combustion turbine exhaust flow and fuel flow, while producing 10% – 12% more power output. The vendor of the compressor upgrade has provided guarantees to Orlando Cogen that the plant will continue to meet the NO_x and CO permit emission limitations of 15 ppmdv@15% O_2 and 10 ppmdv, respectively.

EMISSION ESTIMATES

The permit application package, including forms and emission tables, are presented in Attachment 1 to this letter. Attachment 2 provides requested changes to the current TV permit. Previous criteria pollutant emissions from the Orlando CoGen facility are summarized in Table 1 (Attachment 1), which follows this letter. These data are presented for Calendar Years (CYs) 2001 through 2006. These data were obtained from the Annual Operating Reports (AORs) submitted to the Florida Department of Environmental Protection (FDEP).

As stated previously, the improved compressor blade design is expected to increase the firing capability of the combustion turbine by up to 10%. Table 2 provides the CY 2006 estimated annual emissions and the projected annual emission after the completion of the compressor upgrade project. These projected emissions conservatively assume that the combustion turbine (EU 001) emissions increase from CY 2006 levels by 10%, and there is no change in the duct burner (EU 002) from CY 2006. These are conservative assumptions as:

1. The combustion turbine is not likely to consistently run at 10% greater load conditions than for CY 2006; and,

2. The duct burner usage will likely decrease due to the increased capability of the combustion turbine.

REGULATORY REVIEW

The first aspect of the regulatory review involves the classification of the change from a programmatic perspective. The facility is considered an existing major source for the Prevention of Significant Determination (PSD) regulations as the permitted potential emissions for the site exceed the 100 ton per year threshold for both oxides of nitrogen (NO_x) and carbon monoxide (CO). Hence, the projected emissions increases (past actual to future projected actual) are compared to the PSD Significant Emission Rates (SERs). The emission increases are presented in Table 3. The projected criteria pollutant emission increases are considerably less than the corresponding PSD SERs. Hence, PSD review is not required for this construction permit application.

Table 3 summarizes the greatest past actual 2-year average annual emission per pollutant (TPY) for the facility. Recent revisions to the State of Florida's new source review program (62-210.200) now allow for "actual emissions" to be determined over "consecutive 24-month periods"; however, for purposes of this analysis, the highest 2 calendar year periods in the previous 5 years were considered.

Because this combustion activity upgrade occurs in the same 5 year window as the CY 2005 upgrade, it may be considered a contemporaneous project. Therefore, the baseline emissions for the emission increase are from the period prior to the CY 2005 combustion turbine upgrade.

Note that the emission netting information was developed using the simplifying assumption that the compressor upgrade would produce the maximum heat input increase of 10% compared to baseline operations. This assumption greatly overestimates the likely emission change, as the additional heat input capability would only be exercised during those periods in which the plant is operating the turbine at base load in order to sell power into the grid during conditions of extremely high demand. The impact of the compressor upgrade on fuel firing and emissions during the typical plant dispatch conditions of 97 MWe and 114 MWe will likely be to reduce fuel firing and emissions as compared to the existing condition. This reduction is because the improved capabilities of the combustion turbine after the compressor upgrade will allow the plant to rely less on the need to use the duct burner in order to achieve the contractually required levels of power production.

Even with the use of conservative simplifying assumptions, Table 3 demonstrates that emissions increases after the compressor upgrade will not exceed the SERs that would trigger PSD review for affected pollutants. Table 2 includes a comparison of the anticipated actual emissions with the permitted emission limits. From an annual facility-wide emission limit perspective, the emissions are expected to be approximately 3% of the limit for CO, and 70% of the limits for the remainder of the criteria pollutants.

As discussed in the following section that addresses requested changes to the current permit, Table 2 includes requested revised emission limits for NO_x (hourly only), and VOC, PM, and PM_{10} (hourly and annual). These revised limits result from the increased heat input capacity of the combustion turbine, and do not represent an increase in concentration (e.g., ppm) of these criteria pollutants.

This request will trigger applicability of the recently promulgated New Source Performance Standard (NSPS), Subpart KKKK, *Standards of Performance for Stationary Combustion Turbines*. This applicability is due to the fact that this request constitutes a change in the method of operation accompanied by an increase in the actual hourly emission rate of a regulated pollutant, commencing after February 18, 2005. The facility, as currently permitted, will meet the allowable emissions requirements in this newly promulgated NSPS. This NSPS regulates the pollutants SO_2 and NO_x. The SO_2 emission limit involves a choice of two limits, one that is expressed based on mass per power output, and one that is based on fuel sulfur content. These two limits are contained in 40 CFR §60.4330, and are summarized following:

1. 0.90 pounds SO_2 per megawatt-hour gross output; or,

2. 0.060 pounds SO_2 per MMBtu heat input.

The facility uses pipeline quality natural gas, which because of its low sulfur content, enables the combustion turbine to meet either of these two limits with a large margin of compliance.

The NO_x emission limit for this combustion turbine (based on maximum heat input rating being greater than 850 MMBtu/hr) is similarly stated as a choice of two limits. One limit is based on concentration in the effluent gas, and the other limit is based on mass per power output. These two limits are contained in Table 1 of the NSPS, and are summarized following:

1. 15 ppm at 15 percent O_2; or,

2. 0.43 pounds per megawatt-hour gross output.

The 15 ppm limit is the same limit as contained in permit Condition A.5. Hence, no changes to the emission limit are required for the NO_x limit to incorporate the NSPS. Permit Condition A.10 addresses sulfur dioxide, and will need to be changed to include the NSPS limits. The proposed changes to this permit are discussed following in this letter.

Northern Star has reviewed the remaining requirements of NSPS Subpart KKKK (e.g., recordkeeping and testing), and believes that the current permit addresses these requirements. Hence, no other changes are requested to the operating permit to accommodate the NSPS.

REQUESTED PERMIT CONDITIONS

The requested permit conditions are expressed based on the current Title V operating permit and are included in Attachment 2. Northern Star requests that the construction permit be similar to the current Title V operating permit.

The requested revised emission limits are for NO_x (hourly only), and VOC, PM, and PM_{10} (hourly and annual). These revised limits result from the increased heat input capacity of the combustion turbine, and do not represent an increase in concentration (e.g., ppm) of these criteria pollutants. The total annual NO_x emission limit is not increased as Northern Star believes there is sufficient margin in the current emission limit. A ten percent increase in the hourly NO_x emission rate for EU 001 is requested. This requested increase is also requested for the combined hourly NO_x limit for EU 001 and 002.

The PM and PM_{10} emission limit for EU 001 is stated in terms of pounds per million British Thermal Units (lbs/MMBtu), with the mass emission rates of lb/hr and tpy stated parenthetically. The requested revisions for the PM and PM_{10} hourly and annual emission rate is requested for consistency with the primary limit that is stated in units of lbs/MMBtu.

A ten percent increase in the hourly and annual VOC emission limit for EU 001 is requested. This increase provides for the ten percent increased heat input capacity of the combustion turbine.

The proposed changes also address the addition of the NSPS Subpart KKKK emission limits.

CLOSING

Northern Star and Orlando CoGen Limited, L.P. appreciates the Department's timely consideration of this construction permit application. If you have any questions regarding this application, please contact either Dave Kellermeyer of Northern Star at (713) 580-6368 or Scott Osbourn of Golder Associates at (813) 287-1717. David Good and I can be reached at Orlando Cogen at (407) 851-1350.

Sincerely,

Jim Murray
Plant Manager

cc: David Good, Orlando CoGen
Dave Kellermeyer, Northern Star Generation Services Company LLC
Scott Osbourn, P.E., Golder Associates Inc.

Attachments
1 – Permit Application Forms
2 – Requested Changes to Title V permit

ATTACHMENT 1

Minor Source Air Construction Permit Application

Department of
Environmental Protection
Division of Air Resource Management
APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **Northern Star Generation Services**
2. Site Name: **Orlando CoGen Limited, L.P.**
3. Facility Identification Number: **0950203**
4. Facility Location...
   Street Address or Other Locator: **8275 Exchange Drive**
   City: **Orlando** County: **Orange** Zip Code: **32809**
5. Relocatable Facility? ☐ Yes ☒ No
6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Dave Kellermeyer, Vice President, EH&S**
2. Application Contact Mailing Address...
   Organization/Firm: **Northern Star Generation Services Company, LLC**
   Street Address: **2929 Allen Parkway, Suite 2200**
   City: **Houston** State: **Texas** Zip Code: **77019**
3. Application Contact Telephone Numbers...
   Telephone: **(713) 580 - 6368** ext. Fax: **(713) 580 - 6320**
4. Application Contact Email Address: **dave.kellermeyer@northernstargen.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 8/31/07
2. Project Number(s): 0950203-007-AC
3. PSD Number (if applicable):
4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- [x] Air construction permit.
- [ ] Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- [ ] Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- [ ] Initial Title V air operation permit.
- [ ] Title V air operation permit revision.
- [ ] Title V air operation permit renewal.
- [ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- [ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- [ ] Air construction permit and Title V permit revision, incorporating the proposed project.
- [ ] Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- [ ] I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This permit application serves to request an increase in the allowable fuel firing rate of the combustion turbine (EU 001) from 890 MMBtu/hr (LHV at ISO conditions) to 980 MMBtu/hr (LHV at ISO conditions), an increase of approximately ten percent. This increase is associated with the planned end-of-life replacement of the gas turbine rotor and the associated upgrade of the compressor section of the gas turbine. This change will serve to (1) increase gas turbine output, (2) decrease the need to fire the duct burner, and (3) improve the overall plant efficiency. The projected net emissions increase (past actual to future actual emissions) are less than the Prevention of Significant Deterioration (PSD) Significant Emission Rates (SERs), hence this project is not subject to PSD review. This permit application is, therefore, a minor source construction permit application. Additional information regarding this project is provided in the cover letter and attachments.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	Combustion turbine, Phase II Acid Rain Unit	AF2B	$0
002	HRSG and Duct Burner System, Phase II Acid Rain Unit	AF2B	$0

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
   Jim Murray – Plant Manager
2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Orlando Cogen – Northern Star Generation Services**
   Street Address: **8275 Exchange Drive**
   City: **Orlando** State: **FL** Zip Code: **32809**
3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(407)851-1350** ext. Fax: **(407)851-1686**
4. Owner/Authorized Representative Email Address: jim.murray@northernstargen.com
5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

Signature

8-16-07
Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

4. Application Responsible Official Telephone Numbers...
   Telephone: ext. Fax:

5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   Signature Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Scott Osbourn**
   Registration Number: **PE 57557**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.**
   Street Address: **5100 W. Lemon Street, Suite 114**
   City: **Tampa** State: **FL** Zip Code: **33609**
3. Professional Engineer Telephone Numbers...
   Telephone: **(813)287-1717** ext. Fax: **(813)287-1716**
4. Professional Engineer Email Address: sosbourn@golder.com
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here [X], if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature (seal) Date: 8/17/07

*Attach any exception to certification statement.**Board of Professional Engineers Certificate of Authorization No. 00001670

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **17** East (km) **459.5** North (km) **3146.1**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) **28/26/23** Longitude (DD/MM/SS) **81/24/28**	
3. Governmental Facility Code: **NONE**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **49**	6. Facility SIC(s): **4931 Combination Electric & Gas & Other Utility Services**
7. Facility Comment : **137 MW nominal Combined Cycle Gas Turbine with a HRSG and Duct Burner System Cogeneration facility**			

Facility Contact

1. Facility Contact Name: **Jim Murray**
2. Facility Contact Mailing Address... Organization/Firm: **Orlando Cogen – Northern Star Generation Services** Street Address: **8275 Exchange Drive** City: **Orlando** State: **FL** Zip Code: **32809**
3. Facility Contact Telephone Numbers: Telephone: **(407)851-1350** ext. Fax: **(407)851-1686**
4. Facility Contact Email Address: jim.murray@northernstargen.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. [x] Title V Source	
4. [x] Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☐ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. [x] One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☐ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: **The proposed modification is subject to the NSPS, Subpart KKKK.**	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Carbon Monoxide	**A**	
Nitrogen Oxides	**A**	
Particulate Matter - Total	**B**	
Particulate Matter – PM10	**B**	
Sulfur Dioxide	**B**	
Volatile Organic Compounds	**B**	

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NO_x		**001**	**63.1**	**251.4**	**Title V Permit A.5**
CO		**001**	**22.3**	**92.1**	**Title V Permit A.6**
PM		**001**	**9.9**	**43.3**	**Title V Permit A.7**
PM_{10}		**001**	**9.9**	**43.3**	**Title V Permit A.7**
VOC		**001**	**3.3**	**14.3**	**Title V Permit A.8**
NO_x		**002**	**12.2**	**22.5**	**Title V Permit B.5**
CO		**002**	**12.2**	**22.5**	**Title V Permit B.6**
PM		**002**	**1.2**	**2.2**	**Title V Permit B.7**
PM_{10}		**002**	**1.2**	**2.2**	**Title V Permit B.7**
VOC		**002**	**3.7**	**6.8**	**Title V Permit B.8**
NO_x		**001 & 002**	**75.3**	**N/A**	**Title V Permit C.0**

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

Requested hourly emission caps for EU001 (combustion turbine) are current hourly emission rates contained in the Title V operating permit for all pollutants other than NO_x, PM/PM_{10}, and VOC. The NO_x, PM/PM_{10}, and VOC limits have a 10% increase for the combustion turbine to account for the requested increased heat input rate. The limits for other pollutants have an adequate margin of compliance that allows for continuance of the limit without adjustment. The annual emission caps are changed from the current Title V permit limits for VOC and PM/PM_{10} only. The NO_x and CO annual caps have sufficient margin of compliance to not require an increase in the annual limits. Emission limits for EU 002 (duct burner) are unchanged from current Title V permit.

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ [x] Previously Submitted, Date: **9/2003**
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ [x] Previously Submitted, Date: **9/2003**
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ [x] Previously Submitted, Date: **9/2003**

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:_____ [x] Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):
   [x] Attached, Document ID: **Cover Letter**
3. Rule Applicability Analysis:
   [x] Attached, Document ID: **Cover Letter**
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
5. Fugitive Emissions Identification:
   ☐ Attached, Document ID:_____ [x] Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
    ☐ Attached, Document ID:_____ [x] Not Applicable

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   ☐ Attached, Document ID:___ ☐ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   ☐ Attached, Document ID:___
   ☐ Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   ☐ Attached, Document ID:___
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:___
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   ☐ Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:_____ ☐ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:___ ☐ Not Applicable

Additional Requirements Comment

TABLE 1

Orlando Cogen Facility - Historical Annual Emissions by Unit

Year		2001			2002			2003		
Pollutant		**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***
Volatile Organic Compounds	**VOC**	11.4	3.1	*14.4*	11.8	2.5	*14.3*	12.0	5.4	*17.4*
Sulfur Dioxide	**SO_2**	2.1	0.1	*2.2*	2.2	0.1	*2.3*	2.3	0.1	*2.5*
Particulate Matter	**PM**	30.0	0.9	*30.9*	31.1	0.8	*31.8*	31.6	1.6	*33.2*
Nitrogen Oxides	**NO_x**	234.0	7.2	*241.2*	220.0	5.3	*225.3*	229.7	9.9	*239.5*
Carbon Monoxide	**CO**	2.5	1.4	*3.8*	2.0	0.7	*2.7*	2.1	0.4	*2.6*
Particulate Matter 10	**PM_{10}**	30.0	0.9	*30.9*	31.1	0.8	*31.8*	31.6	1.6	*33.2*

Source: AOR Data

TABLE 1 (continued)

Orlando Cogen Facility - Historical Annual Emissions by Unit

Year		2004			2005			2006		
Pollutant		**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***
Volatile Organic Compounds	**VOC**	9.3	5.3	*14.6*	10.5	3.8	*14.3*	11.5	3.5	***15.0***
Sulfur Dioxide	**SO_2**	1.8	0.1	1.9	2.0	0.1	2.1	2.2	0.1	*2.3*
Particulate Matter	**PM**	24.6	1.6	*26.2*	27.7	1.2	*28.9*	30.3	1.1	***31.4***
Nitrogen Oxides	**NO_x**	142.0	0.7	*142.7*	184.5	11.2	*195.7*	192.5	5.2	***197.6***
Carbon Monoxide	**CO**	3.1	0.3	*3.4*	2.3	1.1	*3.3*	3.7	0.3	***4.0***
Particulate Matter 10	**PM_{10}**	24.6	1.6	*26.2*	27.7	1.2	*28.9*	30.3	1.05	***31.4***

Source: AOR Data

TABLE 2

Orlando Cogen Facility - Projected Actual Emissions

Year		**2006 (Past Actual)**			**Post Change (Projected Actual)**			**Permit Limt**	**Projected Emissions**
Pollutant		**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	**Total (tpy)**	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	**Total (tpy)**	**Total (tpy)**	**% of Emission Limit**
Volatile Organic Compounds	VOC	11.5	3.5	15.0	12.7	3.5	16.1	21.1	71%
Sulfur Dioxide	SO_2	2.2	0.1	2.3	2.4	0.1	2.5	n/a	n/a
Particulate Matter	PM	30.3	1.1	31.4	33.4	1.1	34.4	45.5	69%
Nitrogen Oxides	NO_x	192.5	5.2	197.6	211.7	5.2	216.9	273.9	72%
Carbon Monoxide	CO	3.7	0.3	4.0	4.1	0.3	4.4	114.6	3%
Particulate Matter 10	PM_{10}	30.3	1.05	31.4	33.4	1.1	34.4	45.5	69%

Assumptions:

1. CY 2006 dispatch is representative of future dispatch
2. EU001 (CT) emissions post change are conservatively estimated as 10% greater than CY 2006 due to increased compressor capacity
3. EU002 (DB) emissions are conservatively assumed to be not affected by change.
4. Permit Limit is for EU 001 and 002 combined, including requested revisions for VOC and PM/PM_{10}

TABLE 3 - PSD Netting Analysis

Orlando Cogen Facility

Year		Pre-2005 (Past Actual)				Post Change (Projected			PSD Netting Analysis		
Pollutant		**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	**Total (tpy)**	**CY for Past Actual Emissions**	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	**Total (tpy)**	**Total (tpy)**	**PSD SER**	**Increase Greater than SER?**
Volatile Organic Compounds	VOC	11.9	3.9	15.8	2002-2003	12.7	3.5	16.1	0.3	40	No
Sulfur Dioxide	SO_2	2.3	0.1	2.4	2002-2003	2.4	0.1	2.5	0.2	40	No
Particulate Matter	PM	31.3	1.2	32.5	2002-2003	33.4	1.1	34.4	1.9	25	No
Nitrogen Oxides	NO_x	227.0	6.2	233.2	2001-2002	211.7	5.2	216.9	-16.4	40	No
Carbon Monoxide	CO	2.6	0.4	3.0	2003-2004	4.1	0.3	4.4	1.4	100	No
Particulate Matter 10	PM_{10}	31.3	1.2	32.5	2002-2003	33.4	1.1	34.4	1.9	15	No

Assumptions / Notes:

1. CY 2006 dispatch is representative of future dispatch
2. EU001 (CT) emissions post change are conservatively estimated as 10% greater than CY 2006 due to increased compressor capacity
3. EU002 (DB) emissions are conservatively assumed to be not affected by change.
4. Pre-2005 (Past Actual) based on the greatest 2-year average using annual data.
5. The site is major for PSD for NOx and CO only

ATTACHMENT 2

Requested TV Permit Revisions

Attachment 2 – Suggested Permit Condition Changes

Suggested changes are provided in redline strikethrough mode. Blue normal text is for revised text, ~~red strikethrough text~~ is for suggested deleted text.

Section I. Subsection A. (page 2) Facility Description. First paragraph.

…The facility's nominal output is ~~128.9~~ 137 megawatts (MW).

Section III. Subsection A. (page 7), first paragraph.

The combined cycle combustion turbine (CT) is an Alstom Model GT 11NM with a nameplate rating of ~~78.9~~ 86.8 MW at ISO conditions.

Section III, Condition A.5. (page 8)

Nitrogen Oxides. Nitrogen oxide emissions, expressed as NO_x, shall not exceed 15 ppmvd (24-hr rolling average) @ 15% O2 (~~57.4~~ 63.1 lbs/hr, 251.4 TPY). (See also Specific Condition C.0.)

Section III, Condition A.7. (page 8)

Particulate Matter. Particulate matter emissions, expressed as PM/PM_{10}, shall not exceed 0.1 lb/MMBtu (~~9.0~~ 9.9 lbs/hr; ~~39.4~~ 43.3 TPY).

Section III, Condition A.7. (page 8)

Volatile Organic Compounds. Volatile organic compound emissions, expressed as VOC, shall not exceed ~~3.0~~ 3.3 lbs/hr; ~~13.0~~ 14.3 TPY.

Section III, Condition A.10. (page 8)

Sulfur Dioxide. No fuels shall be burned at this source which contain sulfur in excess of 0.8 percent by weight.

In addition the permittee shall not discharge from the combustion turbine any exhaust that contains sulfur dioxide in excess of:

1. 0.90 pounds SO_2 per megawatt-hour gross output; or,
2. 0.060 pounds SO_2 per MMBtu heat input.

Section III, Condition C.0. (page 15)

When both the CT and DB are operating, NO_x emissions shall not exceed ~~69.6~~ 75.3 lbs/hr.

Note – based on 63.1 lb/hr for combustion turbine and 12.2 lb/hr for duct burner.

Section III, Condition C.5. (page 16)

Combustion control shall be utilized for CO control. ~~The permittee shall have designed the facility to allow for future installation of an oxidation catalyst. Once the performance testing has been completed, the decision to require an oxidation catalyst will be based on a cost/benefit analysis of using such control.~~

Note – performance testing was completed, oxidation catalyst is not cost effective, hence this portion of the requirement can be removed.

Section III, Condition C.22. (page 19)

…compliance is considered to occur when the NO_x emissions are less than or equal to ~~57.4~~ 63.1 lb/hr when only the CT is operating and less than or equal to ~~69.6~~ 75.3 lb/hr when both the CT and DB are operating.

Section III, Condition C.22. (page 20)

Example Calculated Emission Limitation = [(~~57.4~~ 63.1 lb/hr x 20 hrs) + (~~69.6~~ 75.3 lb/hr x 4 hrs)]/24 hours

24 hour rolling average NOx compliance level = ~~59.4~~ 65.1 lb/hr

Section III, Condition C.32. (page 23)

….The baseline emissions for operation prior to the project are 3.0 tons per year of CO (CY 2003 – 2004) and ~~232~~ 233.2 tons per year of NO_x (CY 2001 – 2002).

NORTHERN STAR
GENERATION SERVICES
COMPANY LLC
Orlando Cogeneration Ltd.
8275 Exchange Drive
Orlando, FL 32809
Telephone: (407) 851-1350
Facsimile: (407) 851-1686

August 17, 2007

Copy

Mr. Jeff Koerner
FDEP/DARM
North Permitting Section
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Orlando Cogeneration Facility; Request for Heat Input Increase
Facility No. 0950203

Dear Mr. Koerner:

The enclosed air quality construction permit application package is submitted by Northern Star Generation Services Company LLC (Northern Star). Northern Star is the operating agent for Orlando CoGen Limited, L.P. ("Orlando CoGen"), owners of a 137 MW (nominal) natural gas fired cogeneration power plant in Orlando, Florida. This facility operates under the authority of Title V Air Operation Permit Number 0950203-006-AV, which has an effective date of January 24, 2006. This Title V permit expires on December 31, 2008, and a renewal application is due by July 5, 2008. Given the time constraints of this project, Northern Star is submitting a construction permit application. Northern Star is amenable to the concurrent procession of this application as a Title V renewal, if the Department has sufficient resources to meet our schedule. Should this situation be the case, Northern Star would provide the additional information required for the Title V renewal as a supplemental submittal upon request from the Department.

The enclosed permit application serves as a construction permit application to provide for an upgrade to the gas turbine compressor that will be performed as part of a scheduled end-of-life replacement of the gas turbine rotor. This change is considered a modification to the unit as it will potentially increase the short-term emission rates from the unit. The projected net emissions increase for all pollutants is less than the Prevention of Significant Deterioration (PSD) Significant Emission Rate (SER), hence this project is not subject to PSD permitting review.

This letter addresses the following items associated with this project:

- Background Information
- Project Description
- Emission Estimates
- Regulatory Review
- Requested Permit Conditions

BACKGROUND INFORMATION

The Orlando facility consists of a single Alstom (ABB) GT 11NM gas turbine in combined cycle operation. The exhaust from the gas turbine is directed into a heat recovery steam generator (HRSG) which is equipped with a duct burner. Both the gas turbine and duct burner are single fuel pipeline quality natural gas emission sources. The facility does not have dual fuel capability. Power output from the plant is delivered through the Progress Energy Florida (PEF) transmission grid along an existing 69

kV transmission line to two customers, PEF and Reedy Creek Improvement District (RCID). Power is sold to both customers under existing long-term power purchase agreements. The facility utilizes a steam absorption chiller to produce chilled water for the adjacent Air Products facility and maintains Federal Energy Regulatory Commission (FERC) Qualified Facility (QF) status. The power plant is a base load facility that has operated at a capacity factor averaging approximately 89% for the period 2001 through 2006.

The Orlando CoGen's Alstom GT 11N1 gas turbine has been in service since the start of plant operations in 1993. This gas turbine was upgraded to a GT 11NM in 2005. Orlando Cogen submitted a permit application to the DEP on February 22, 2005 to provide for this upgrade. It was not anticipated at that time that the turbine upgrade would require any increase in the permit limits. Subsequently, it was discovered that the GT 11NM turbine upgrade could allow additional firing of the unit and another permit application was filed on August 8, 2005 to revise the permitted capacity (as defined in Condition A.1 of the permit) from 856.9 MMBtu/hr (LHV, ISO) to 890 MMBtu/hr. The final revised Title V permit (Permit No. 0950203-006-AV) was issued on January 24, 2006.

PROJECT DESCRIPTION

A major scheduled maintenance outage is planned for March 2008. This outage is expected to last approximately 2-3 weeks. One of the major outage activities will be the normal, end-of-life replacement of the gas turbine rotor. Alstom has also recommended that Orlando Cogen replace the existing compressor section due to normal end-of-life issues within the next three years based on current operation. Based on this recommendation, Orlando Cogen has elected to replace the compressor section during the scheduled rotor replacement to minimize the impact on plant operations and utilize the opportunity provided during this replacement to upgrade the compressor section of the gas turbine. This upgrade to the GT 11 NMC will:

1. Increase gas turbine output by up to 10%;
2. Decrease the need to fire the duct burner; and,
3. Improve the overall plant efficiency.

The compressor upgrade will consist of the replacement of the following parts:

1. Row #1-17 compressor blades
2. Row #1-18 inlet compressor guide vanes
3. Stage #18 filler pieces

In addition, the work may include one upgraded blow off valve and startup piping with a motor-driven valve or modifications to the inlet bellmouth assembly. The use of these advanced blades will provide a performance enhancement that may result in an increase in gas turbine heat input under certain plant operating conditions.

The improved compressor blade design will result in an increase in compressor discharge pressure, which in turn produces an increase in the total mass flow through the turbine. The increase in air flow allows increased fuel firing and power output at approximately the same (or a slightly improved) heat rate. One advantage of this upgrade is that the additional power output from the gas turbine can greatly reduce (or in some situations eliminate) fuel firing in the duct burner.

The compressor upgrade would produce an increase of up to 10% in the combustion turbine exhaust flow and fuel flow, while producing 10% – 12% more power output. The vendor of the compressor upgrade has provided guarantees to Orlando Cogen that the plant will continue to meet the NO_x and CO permit emission limitations of 15 ppmdv@15% O_2 and 10 ppmdv, respectively.

EMISSION ESTIMATES

The permit application package, including forms and emission tables, are presented in Attachment 1 to this letter. Attachment 2 provides requested changes to the current TV permit. Previous criteria pollutant emissions from the Orlando CoGen facility are summarized in Table 1 (Attachment 1), which follows this letter. These data are presented for Calendar Years (CYs) 2001 through 2006. These data were obtained from the Annual Operating Reports (AORs) submitted to the Florida Department of Environmental Protection (FDEP).

As stated previously, the improved compressor blade design is expected to increase the firing capability of the combustion turbine by up to 10%. Table 2 provides the CY 2006 estimated annual emissions and the projected annual emission after the completion of the compressor upgrade project. These projected emissions conservatively assume that the combustion turbine (EU 001) emissions increase from CY 2006 levels by 10%, and there is no change in the duct burner (EU 002) from CY 2006. These are conservative assumptions as:

1. The combustion turbine is not likely to consistently run at 10% greater load conditions than for CY 2006; and,

2. The duct burner usage will likely decrease due to the increased capability of the combustion turbine.

REGULATORY REVIEW

The first aspect of the regulatory review involves the classification of the change from a programmatic perspective. The facility is considered an existing major source for the Prevention of Significant Determination (PSD) regulations as the permitted potential emissions for the site exceed the 100 ton per year threshold for both oxides of nitrogen (NO_x) and carbon monoxide (CO). Hence, the projected emissions increases (past actual to future projected actual) are compared to the PSD Significant Emission Rates (SERs). The emission increases are presented in Table 3. The projected criteria pollutant emission increases are considerably less than the corresponding PSD SERs. Hence, PSD review is not required for this construction permit application.

Table 3 summarizes the greatest past actual 2-year average annual emission per pollutant (TPY) for the facility. Recent revisions to the State of Florida's new source review program (62-210.200) now allow for "actual emissions" to be determined over "consecutive 24-month periods"; however, for purposes of this analysis, the highest 2 calendar year periods in the previous 5 years were considered.

Because this combustion activity upgrade occurs in the same 5 year window as the CY 2005 upgrade, it may be considered a contemporaneous project. Therefore, the baseline emissions for the emission increase are from the period prior to the CY 2005 combustion turbine upgrade.

Note that the emission netting information was developed using the simplifying assumption that the compressor upgrade would produce the maximum heat input increase of 10% compared to baseline operations. This assumption greatly overestimates the likely emission change, as the additional heat input capability would only be exercised during those periods in which the plant is operating the turbine at base load in order to sell power into the grid during conditions of extremely high demand. The impact of the compressor upgrade on fuel firing and emissions during the typical plant dispatch conditions of 97 MWe and 114 MWe will likely be to reduce fuel firing and emissions as compared to the existing condition. This reduction is because the improved capabilities of the combustion turbine after the compressor upgrade will allow the plant to rely less on the need to use the duct burner in order to achieve the contractually required levels of power production.

Even with the use of conservative simplifying assumptions, Table 3 demonstrates that emissions increases after the compressor upgrade will not exceed the SERs that would trigger PSD review for affected pollutants. Table 2 includes a comparison of the anticipated actual emissions with the permitted emission limits. From an annual facility-wide emission limit perspective, the emissions are expected to be approximately 3% of the limit for CO, and 70% of the limits for the remainder of the criteria pollutants.

As discussed in the following section that addresses requested changes to the current permit, Table 2 includes requested revised emission limits for NO_x (hourly only), and VOC, PM, and PM_{10} (hourly and annual). These revised limits result from the increased heat input capacity of the combustion turbine, and do not represent an increase in concentration (e.g., ppm) of these criteria pollutants.

This request will trigger applicability of the recently promulgated New Source Performance Standard (NSPS), Subpart KKKK, *Standards of Performance for Stationary Combustion Turbines*. This applicability is due to the fact that this request constitutes a change in the method of operation accompanied by an increase in the actual hourly emission rate of a regulated pollutant, commencing after February 18, 2005. The facility, as currently permitted, will meet the allowable emissions requirements in this newly promulgated NSPS. This NSPS regulates the pollutants SO_2 and NO_x. The SO_2 emission limit involves a choice of two limits, one that is expressed based on mass per power output, and one that is based on fuel sulfur content. These two limits are contained in 40 CFR §60.4330, and are summarized following:

1. 0.90 pounds SO_2 per megawatt-hour gross output; or,

2. 0.060 pounds SO_2 per MMBtu heat input.

The facility uses pipeline quality natural gas, which because of its low sulfur content, enables the combustion turbine to meet either of these two limits with a large margin of compliance.

The NO_x emission limit for this combustion turbine (based on maximum heat input rating being greater than 850 MMBtu/hr) is similarly stated as a choice of two limits. One limit is based on concentration in the effluent gas, and the other limit is based on mass per power output. These two limits are contained in Table 1 of the NSPS, and are summarized following:

1. 15 ppm at 15 percent O_2; or,

2. 0.43 pounds per megawatt-hour gross output.

The 15 ppm limit is the same limit as contained in permit Condition A.5. Hence, no changes to the emission limit are required for the NO_x limit to incorporate the NSPS. Permit Condition A.10 addresses sulfur dioxide, and will need to be changed to include the NSPS limits. The proposed changes to this permit are discussed following in this letter.

Northern Star has reviewed the remaining requirements of NSPS Subpart KKKK (e.g., recordkeeping and testing), and believes that the current permit addresses these requirements. Hence, no other changes are requested to the operating permit to accommodate the NSPS.

REQUESTED PERMIT CONDITIONS

The requested permit conditions are expressed based on the current Title V operating permit and are included in Attachment 2. Northern Star requests that the construction permit be similar to the current Title V operating permit.

The requested revised emission limits are for NO_x (hourly only), and VOC, PM, and PM_{10} (hourly and annual). These revised limits result from the increased heat input capacity of the combustion turbine, and do not represent an increase in concentration (e.g., ppm) of these criteria pollutants. The total annual NO_x emission limit is not increased as Northern Star believes there is sufficient margin in the current emission limit. A ten percent increase in the hourly NO_x emission rate for EU 001 is requested. This requested increase is also requested for the combined hourly NO_x limit for EU 001 and 002.

The PM and PM_{10} emission limit for EU 001 is stated in terms of pounds per million British Thermal Units (lbs/MMBtu), with the mass emission rates of lb/hr and tpy stated parenthetically. The requested revisions for the PM and PM_{10} hourly and annual emission rate is requested for consistency with the primary limit that is stated in units of lbs/MMBtu.

A ten percent increase in the hourly and annual VOC emission limit for EU 001 is requested. This increase provides for the ten percent increased heat input capacity of the combustion turbine.

The proposed changes also address the addition of the NSPS Subpart KKKK emission limits.

CLOSING

Northern Star and Orlando CoGen Limited, L.P. appreciates the Department's timely consideration of this construction permit application. If you have any questions regarding this application, please contact either Dave Kellermeyer of Northern Star at (713) 580-6368 or Scott Osbourn of Golder Associates at (813) 287-1717. David Good and I can be reached at Orlando Cogen at (407) 851-1350.

Sincerely,

Jim Murray
Plant Manager

cc: David Good, Orlando CoGen
Dave Kellermeyer, Northern Star Generation Services Company LLC
Scott Osbourn, P.E., Golder Associates Inc.

Attachments
1 – Permit Application Forms
2 – Requested Changes to Title V permit

ATTACHMENT 1

Minor Source Air Construction Permit Application

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **Northern Star Generation Services**
2. Site Name: **Orlando CoGen Limited, L.P.**
3. Facility Identification Number: **0950203**
4. Facility Location...
   Street Address or Other Locator: **8275 Exchange Drive**
   City: **Orlando** County: **Orange** Zip Code: **32809**
5. Relocatable Facility? ☐ Yes ☒ No
6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Dave Kellermeyer, Vice President, EH&S**
2. Application Contact Mailing Address...
   Organization/Firm: **Northern Star Generation Services Company, LLC**
   Street Address: **2929 Allen Parkway, Suite 2200**
   City: **Houston** State: **Texas** Zip Code: **77019**
3. Application Contact Telephone Numbers...
   Telephone: **(713) 580 - 6368** ext. Fax: **(713) 580 - 6320**
4. Application Contact Email Address: **dave.kellermeyer@northernstargen.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 8/31/07
2. Project Number(s): 0950203-007-AC
3. PSD Number (if applicable):
4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- [x] Air construction permit.
- [ ] Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- [ ] Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- [ ] Initial Title V air operation permit.
- [ ] Title V air operation permit revision.
- [ ] Title V air operation permit renewal.
- [ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- [ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- [ ] Air construction permit and Title V permit revision, incorporating the proposed project.
- [ ] Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- [ ] I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This permit application serves to request an increase in the allowable fuel firing rate of the combustion turbine (EU 001) from 890 MMBtu/hr (LHV at ISO conditions) to 980 MMBtu/hr (LHV at ISO conditions), an increase of approximately ten percent. This increase is associated with the planned end-of-life replacement of the gas turbine rotor and the associated upgrade of the compressor section of the gas turbine. This change will serve to (1) increase gas turbine output, (2) decrease the need to fire the duct burner, and (3) improve the overall plant efficiency. The projected net emissions increase (past actual to future actual emissions) are less than the Prevention of Significant Deterioration (PSD) Significant Emission Rates (SERs), hence this project is not subject to PSD review. This permit application is, therefore, a minor source construction permit application. Additional information regarding this project is provided in the cover letter and attachments.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	Combustion turbine, Phase II Acid Rain Unit	AF2B	$0
002	HRSG and Duct Burner System, Phase II Acid Rain Unit	AF2B	$0

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
   Jim Murray – Plant Manager
2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Orlando Cogen – Northern Star Generation Services**
   Street Address: **8275 Exchange Drive**
   City: **Orlando** State: **FL** Zip Code: **32809**
3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(407)851-1350** ext. Fax: **(407)851-1686**
4. Owner/Authorized Representative Email Address: jim.murray@northernstargen.com
5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

Signature

8-16-07

Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

4. Application Responsible Official Telephone Numbers...
   Telephone: ext. Fax:

5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   Signature Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Scott Osbourn**
   Registration Number: **PE 57557**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.**
   Street Address: **5100 W. Lemon Street, Suite 114**
   City: **Tampa** State: **FL** Zip Code: **33609**
3. Professional Engineer Telephone Numbers...
   Telephone: **(813)287-1717** ext. Fax: **(813)287-1716**
4. Professional Engineer Email Address: sosbourn@golder.com
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature (seal) Date: 8/17/07

SCOTT OSBOURN LICENSE NO. 57557 STATE OF FLORIDA PROFESSIONAL ENGINEER

*Attach any exception to certification statement. ****Board of Professional Engineers Certificate of Authorization No. 00001670**

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **17** East (km) **459.5** North (km) **3146.1**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) **28/26/23** Longitude (DD/MM/SS) **81/24/28**	
3. Governmental Facility Code: **NONE**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **49**	6. Facility SIC(s): **4931 Combination Electric & Gas & Other Utility Services**
7. Facility Comment : **137 MW nominal Combined Cycle Gas Turbine with a HRSG and Duct Burner System Cogeneration facility**			

Facility Contact

1. Facility Contact Name: **Jim Murray**
2. Facility Contact Mailing Address... Organization/Firm: **Orlando Cogen – Northern Star Generation Services** Street Address: **8275 Exchange Drive** City: **Orlando** State: **FL** Zip Code: **32809**
3. Facility Contact Telephone Numbers: Telephone: **(407)851-1350** ext. Fax: **(407)851-1686**
4. Facility Contact Email Address: jim.murray@northernstargen.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. [x] Title V Source	
4. [x] Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☐ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. [x] One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☐ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: **The proposed modification is subject to the NSPS, Subpart KKKK.**	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Carbon Monoxide	**A**	
Nitrogen Oxides	**A**	
Particulate Matter - Total	**B**	
Particulate Matter – PM10	**B**	
Sulfur Dioxide	**B**	
Volatile Organic Compounds	**B**	

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NO_x		**001**	**63.1**	**251.4**	**Title V Permit A.5**
CO		**001**	**22.3**	**92.1**	**Title V Permit A.6**
PM		**001**	**9.9**	**43.3**	**Title V Permit A.7**
PM_{10}		**001**	**9.9**	**43.3**	**Title V Permit A.7**
VOC		**001**	**3.3**	**14.3**	**Title V Permit A.8**
NO_x		**002**	**12.2**	**22.5**	**Title V Permit B.5**
CO		**002**	**12.2**	**22.5**	**Title V Permit B.6**
PM		**002**	**1.2**	**2.2**	**Title V Permit B.7**
PM_{10}		**002**	**1.2**	**2.2**	**Title V Permit B.7**
VOC		**002**	**3.7**	**6.8**	**Title V Permit B.8**
NO_x		**001 & 002**	**75.3**	**N/A**	**Title V Permit C.0**

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

Requested hourly emission caps for EU001 (combustion turbine) are current hourly emission rates contained in the Title V operating permit for all pollutants other than NO_x, PM/PM_{10}, and VOC. The NO_x, PM/PM_{10}, and VOC limits have a 10% increase for the combustion turbine to account for the requested increased heat input rate. The limits for other pollutants have an adequate margin of compliance that allows for continuance of the limit without adjustment. The annual emission caps are changed from the current Title V permit limits for VOC and PM/PM_{10} only. The NO_x and CO annual caps have sufficient margin of compliance to not require an increase in the annual limits. Emission limits for EU 002 (duct burner) are unchanged from current Title V permit.

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ [x] Previously Submitted, Date: **9/2003**
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ [x] Previously Submitted, Date: **9/2003**
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ [x] Previously Submitted, Date: **9/2003**

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:_____ [x] Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):
   [x] Attached, Document ID: **Cover Letter**
3. Rule Applicability Analysis:
   [x] Attached, Document ID: **Cover Letter**
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
5. Fugitive Emissions Identification:
   ☐ Attached, Document ID:_____ [x] Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ [x] Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
    ☐ Attached, Document ID:_____ [x] Not Applicable

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   ☐ Attached, Document ID:___ ☐ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   ☐ Attached, Document ID:___
   ☐ Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   ☐ Attached, Document ID:___
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:___
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   ☐ Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:_____ ☐ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:___ ☐ Not Applicable

Additional Requirements Comment

TABLE 1

Orlando Cogen Facility - Historical Annual Emissions by Unit

Year		2001			2002			2003		
Pollutant		**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***
Volatile Organic Compounds	**VOC**	11.4	3.1	*14.4*	11.8	2.5	*14.3*	12.0	5.4	*17.4*
Sulfur Dioxide	**SO_2**	2.1	0.1	*2.2*	2.2	0.1	*2.3*	2.3	0.1	*2.5*
Particulate Matter	**PM**	30.0	0.9	*30.9*	31.1	0.8	*31.8*	31.6	1.6	*33.2*
Nitrogen Oxides	**NO_x**	234.0	7.2	*241.2*	220.0	5.3	*225.3*	229.7	9.9	*239.5*
Carbon Monoxide	**CO**	2.5	1.4	*3.8*	2.0	0.7	*2.7*	2.1	0.4	*2.6*
Particulate Matter 10	**PM_{10}**	30.0	0.9	*30.9*	31.1	0.8	*31.8*	31.6	1.6	*33.2*

Source: AOR Data

TABLE 1 (continued)

Orlando Cogen Facility - Historical Annual Emissions by Unit

Year		2004			2005			2006		
Pollutant		**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	***Total (tpy)***
Volatile Organic Compounds	**VOC**	9.3	5.3	*14.6*	10.5	3.8	*14.3*	11.5	3.5	***15.0***
Sulfur Dioxide	**SO_2**	1.8	0.1	1.9	2.0	0.1	2.1	2.2	0.1	*2.3*
Particulate Matter	**PM**	24.6	1.6	*26.2*	27.7	1.2	*28.9*	30.3	1.1	***31.4***
Nitrogen Oxides	**NO_x**	142.0	0.7	*142.7*	184.5	11.2	*195.7*	192.5	5.2	***197.6***
Carbon Monoxide	**CO**	3.1	0.3	*3.4*	2.3	1.1	*3.3*	3.7	0.3	***4.0***
Particulate Matter 10	**PM_{10}**	24.6	1.6	*26.2*	27.7	1.2	*28.9*	30.3	1.05	***31.4***

Source: AOR Data

TABLE 2

Orlando Cogen Facility - Projected Actual Emissions

Year		2006 (Past Actual)			Post Change (Projected Actual)			Permit Limt	Projected Emissions
Pollutant		EU 001 CT (tpy)	EU 002 DB (tpy)	Total (tpy)	EU 001 CT (tpy)	EU 002 DB (tpy)	Total (tpy)	Total (tpy)	% of Emission Limit
Volatile Organic Compounds	VOC	11.5	3.5	15.0	12.7	3.5	16.1	21.1	71%
Sulfur Dioxide	SO_2	2.2	0.1	2.3	2.4	0.1	2.5	n/a	n/a
Particulate Matter	PM	30.3	1.1	31.4	33.4	1.1	34.4	45.5	69%
Nitrogen Oxides	NO_x	192.5	5.2	197.6	211.7	5.2	216.9	273.9	72%
Carbon Monoxide	CO	3.7	0.3	4.0	4.1	0.3	4.4	114.6	3%
Particulate Matter 10	PM_{10}	30.3	1.05	31.4	33.4	1.1	34.4	45.5	69%

Assumptions:

1. CY 2006 dispatch is representative of future dispatch
2. EU001 (CT) emissions post change are conservatively estimated as 10% greater than CY 2006 due to increased compressor capacity
3. EU002 (DB) emissions are conservatively assumed to be not affected by change.
4. Permit Limit is for EU 001 and 002 combined, including requested revisions for VOC and PM/PM_{10}

TABLE 3 - PSD Netting Analysis

Orlando Cogen Facility

Year		Pre-2005 (Past Actual)				Post Change (Projected			PSD Netting Analysis		
Pollutant		**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	**Total (tpy)**	**CY for Past Actual Emissions**	**EU 001 CT (tpy)**	**EU 002 DB (tpy)**	**Total (tpy)**	**Total (tpy)**	**PSD SER**	**Increase Greater than SER?**
Volatile Organic Compounds	VOC	11.9	3.9	15.8	2002-2003	12.7	3.5	16.1	0.3	40	No
Sulfur Dioxide	SO_2	2.3	0.1	2.4	2002-2003	2.4	0.1	2.5	0.2	40	No
Particulate Matter	PM	31.3	1.2	32.5	2002-2003	33.4	1.1	34.4	1.9	25	No
Nitrogen Oxides	NO_x	227.0	6.2	233.2	2001-2002	211.7	5.2	216.9	-16.4	40	No
Carbon Monoxide	CO	2.6	0.4	3.0	2003-2004	4.1	0.3	4.4	1.4	100	No
Particulate Matter 10	PM_{10}	31.3	1.2	32.5	2002-2003	33.4	1.1	34.4	1.9	15	No

Assumptions / Notes:

1. CY 2006 dispatch is representative of future dispatch
2. EU001 (CT) emissions post change are conservatively estimated as 10% greater than CY 2006 due to increased compressor capacity
3. EU002 (DB) emissions are conservatively assumed to be not affected by change.
4. Pre-2005 (Past Actual) based on the greatest 2-year average using annual data.
5. The site is major for PSD for NOx and CO only

ATTACHMENT 2

Requested TV Permit Revisions

Attachment 2 – Suggested Permit Condition Changes

Suggested changes are provided in redline strikethrough mode. Blue normal text is for revised text, ~~red strikethrough text~~ is for suggested deleted text.

Section I. Subsection A. (page 2) Facility Description. First paragraph.

…The facility's nominal output is ~~128.9~~ 137 megawatts (MW).

Section III. Subsection A. (page 7), first paragraph.

The combined cycle combustion turbine (CT) is an Alstom Model GT 11NM with a nameplate rating of ~~78.9~~ 86.8 MW at ISO conditions.

Section III, Condition A.5. (page 8)

Nitrogen Oxides. Nitrogen oxide emissions, expressed as NO_x, shall not exceed 15 ppmvd (24-hr rolling average) @ 15% O2 (~~57.4~~ 63.1 lbs/hr, 251.4 TPY). (See also Specific Condition C.0.)

Section III, Condition A.7. (page 8)

Particulate Matter. Particulate matter emissions, expressed as PM/PM_{10}, shall not exceed 0.1 lb/MMBtu (~~9.0~~ 9.9 lbs/hr; ~~39.4~~ 43.3 TPY).

Section III, Condition A.7. (page 8)

Volatile Organic Compounds. Volatile organic compound emissions, expressed as VOC, shall not exceed ~~3.0~~ 3.3 lbs/hr; ~~13.0~~ 14.3 TPY.

Section III, Condition A.10. (page 8)

Sulfur Dioxide. No fuels shall be burned at this source which contain sulfur in excess of 0.8 percent by weight.

In addition the permittee shall not discharge from the combustion turbine any exhaust that contains sulfur dioxide in excess of:

1. 0.90 pounds SO_2 per megawatt-hour gross output; or,
2. 0.060 pounds SO_2 per MMBtu heat input.

Section III, Condition C.0. (page 15)

When both the CT and DB are operating, NO_x emissions shall not exceed ~~69.6~~ 75.3 lbs/hr.

Note – based on 63.1 lb/hr for combustion turbine and 12.2 lb/hr for duct burner.

Section III, Condition C.5. (page 16)

Combustion control shall be utilized for CO control. ~~The permittee shall have designed the facility to allow for future installation of an oxidation catalyst. Once the performance testing has been completed, the decision to require an oxidation catalyst will be based on a cost/benefit analysis of using such control.~~

Note – performance testing was completed, oxidation catalyst is not cost effective, hence this portion of the requirement can be removed.

Section III, Condition C.22. (page 19)

…compliance is considered to occur when the NO_x emissions are less than or equal to ~~57.4~~ 63.1 lb/hr when only the CT is operating and less than or equal to ~~69.6~~ 75.3 lb/hr when both the CT and DB are operating.

Section III, Condition C.22. (page 20)

Example Calculated Emission Limitation = [(~~57.4~~ 63.1 lb/hr x 20 hrs) + (~~69.6~~ 75.3 lb/hr x 4 hrs)]/24 hours

24 hour rolling average NOx compliance level = ~~59.4~~ 65.1 lb/hr

Section III, Condition C.32. (page 23)

….The baseline emissions for operation prior to the project are 3.0 tons per year of CO (CY 2003 – 2004) and ~~232~~ 233.2 tons per year of NO_x (CY 2001 – 2002).