Title V Air Operation Permit Renewal
Permit No. 0950203-009-AV

APPLICANT

The applicant for this project is Orlando CoGen Limited, L.P. The applicant's responsible official and mailing address are: Jim Murray, Plant Manager, Orlando CoGen – Northern Star Generating Services, 8275 Exchange Drive, Orlando, Florida, 32809.

FACILITY DESCRIPTION

The applicant operates the Orlando CoGen, which is located at 8275 Exchange Drive, Orlando, Florida.

The existing facility consists of one 86.8 MW combustion turbine and one heat recovery steam generator (HRSG) equipped with one duct burner (DB) system. The HRSG accepts exhaust from the combustion turbine and powers a 50 MW steam turbine. The combustion turbine is equipped with dry low nitrogen oxides (DLN) combustors to control nitrogen oxides (NO_X) emissions. The emissions from the DB system are uncontrolled. A continuous emissions monitoring system (CEMs) is utilized for NO_X. The CT and DB are allowed to burn only natural gas. The facility has the potential to emit nitrogen oxides, carbon monoxide, particulate matter, volatile organic compounds, and sulfur dioxides. The facility is subject to 40 CFR 75 Acid Rain Monitoring Provisions, 40 CFR 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines, and 40 CFR 60 Subpart A, General Provisions.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility. This permit incorporates the provisions of air construction permit No. 0950203-007-AC and a new specific condition to exclude CEM data during DLN tuning, at the applicant's request.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued **January 1, 1999**
Title V Air Operation Permit Renewal issued **January 1, 2004**
Title V Air Operation Permit Revision issued on **January 24, 2006**
Application for a Title V Air Operation Permit Renewal received **July 7, 2008**
Additional Information Request dated **August 28, 2008**
Additional Information Response received **September 18, 2008**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

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

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility. The emissions are not subject to CAM because they do not meet all the applicability requirements of 40 CFR 64.2. Specifically, the unit has potential pre-control device emissions of the applicable regulated air pollutant that are

equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account. Additionally, the requirements for CAM shall not apply to emission limitations or standards for Acid Rain Program requirements pursuant to sections 404, 405, 406, 407(a), 407(b), or 410 of the Act.

PROJECT REVIEW

Changes made as part of this renewal were reformatting, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, and adding a new specific condition to exclude CEM data during DLN tuning. The Department is in favor of providing the flexibility for operators to maintain and tune combustors according to the manufacturer's recommendations in order to keep units operating as efficiently as possible and to minimize pollutant emissions. It should be noted that the addition of the requested condition (Specific Condition **C.12.**) in the Title V permit is limited to the duration of this renewal and will expire on December 31, 2013. If the company desires to make this a permanent condition, an air construction permit revision will be required at some point. Otherwise, this condition will need to be specifically requested with each future Title V permit renewal.

CONCLUSION

This project renews Title V air operation permit No. 0950203-002-AV, which was issued on January 1, 2004. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, 62-213 and 214, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.