



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Allen Czerkiewicz
Plant Manager
Orange Cogeneration, L.P.
3600 Highway 555
Bartow, FL 33830

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 1050231-016-AV
Orange Cogeneration Facility

Dear Mr. Czerkiewicz:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the Orange Cogeneration Facility located at 1901 S. Clear Springs Road, Polk County is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. Interested persons may view the proposed permit by visiting the following website:

<https://fldep.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Scott Lauder, at 850/717-9077.

Executed in Tallahassee, Florida.

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/srl

Copies sent by electronic mail to the following:

Mr. Allen Czerkiewicz, Northern Star Generation, LLC (allen.czerkiewicz@nsgen.com)
Ms. Kristen Albritton, Northern Star Generation, LLC (Kristen.albritton@northernstargen.com)
Ms. Katherine Katsourides, Trinity Consultants (kkatsourides@trinityconsultants.com)
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Ms. Barbara Friday, DEP OPC (barbara.friday@dep.state.fl.us)

NOTICE OF PROPOSED PERMIT

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.

PROPOSED PERMIT DETERMINATION

Permit No. 1050231-016-AV

I. Public Notice.

An Intent To Issue Air Permit issued to Orange Cogeneration, L.P. for the Orange Cogeneration Facility located at 1901 S Clear Springs Road, Polk County, was clerked on August 8, 2017. The Public Notice Of Intent To Issue Air Permit was published in The Polk County News and Democrat on August 16, 2017. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue Air Permit was received on August 22, 2017.

II. Public Comment(s).

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike-through~~. Changes are highlight in yellow.

Letter from Consultant dated August 14, 2017.

Comment 1. The validity of the testing provisions were questioned regarding the testing of volatile organic compounds (VOC) once per permit term for the turbines in Section III, Subsection A.

Response 1. Permit No. AC53-233851B/PSD-FL-206B explicitly states that VOC shall be tested initially. The Department concluded that Rule 62-297.310, F.A.C., takes precedence with regard to testing prior to permit renewal, because the air construction permit is silent with respect to testing prior to permit renewal. Specific Condition Nos. A.7. and A.21. have been changed as follows:

A.7. CO Emissions. As determined by stack test, CO emissions shall not exceed 30 ppmvd, 27.8 lb/hour and 127 tons/year. ~~{Permitting Note: Only initial test required.}~~ [Rule 62-212.400(BACT), F.A.C.; and Permit Nos. 1050231-007-AC/PSD-FL-206D & 1050231-008-AC]

A.21. Compliance Tests Prior To Renewal. Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see Condition TR7.b(3) in Appendix TR – Facility-wide Testing Requirements), each EU shall be tested for VOC and CO prior to obtaining a renewed operation permit. [Rules 62-210.300(2)(a) and 62-297.310(8)(b), F.A.C.; and Permit No. AC53-233851B/PSD-FL-206B] ~~{Permitting Note: Tests which are only required once during the term of a permit prior to obtaining a renewed permit should be performed roughly five years from the previous test.}~~

Comment 2. The validity of the testing provisions were questioned regarding the testing of VOC and carbon monoxide (CO) once per permit term for the turbines in Section III, Subsection B.

Response 2. Permit No. AC53-233852A/PSD-FL-206B explicitly states that VOC and CO shall be tested initially. The Department concluded that Rule 62-297.310, F.A.C., takes precedence with regard to testing prior to permit renewal, because the air construction permit is silent with respect to testing prior to permit renewal. No changes will be made and the testing of VOC and CO shall be performed prior to renewal pursuant to Rule 62-297.310, F.A.C., and any exemptions contained therein.

Comment 3. The applicant commented on how the reporting of the lower heating value (LHV) and higher heating value (HHV) of each fuel fired should be organized in the Title V Air Operation Permit for the auxiliary boiler in Section III, Subsection B.

Response 3. Permit No. AC53-233852A/PSD-FL-206B states that the LHV of each fuel fired shall be reported in the annual operating report. Because the boiler's maximum heat input is based on the HHV, Specific Condition B.23. has been created to demonstrate compliance with heat input limitations during testing and all other applicable compliance demonstrations. Specific Condition B.22. has been changed and Specific Condition B.23. has been added as follows:

NOTICE OF PROPOSED PERMIT

B.22. Additional Reports Required. The permittee shall report the following with the AOR: sulfur content and the LHV ~~and HHV~~ of the fuels being fired, fuel usage (annual consumption of natural gas and biogas, hours of operation per fuel usage), hours of operations, and air emission limits. [Rules 62-210.370(3) & 62-213.440(1)(b), F.A.C.; and Permit No. AC53-233852A/PSD-FL-206B]

B.23. Heat Input Limitation Compliance. The permittee shall include the HHV of the fuels being fired in all test reports and demonstrations of compliance with heat input limitations. [Rules 62-4.070(3) & 62-297.310(10), F.A.C.]

III. Department Comment.

Comment 1. The Department determined that the gasoline dispensing operations related to an existing 500-gallon gasoline fuel storage tank are subject to 40 CFR 63, Subpart CCCCCC – National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities.

Response 1. The 500-gallon gasoline fuel storage tank and related dispensing activities, previously listed as an unregulated activity in Appendix U, have been moved into the body of Permit No. 1050231-016-AV as a regulated emissions unit and designated as Emissions Unit No. 007. Any and all applicable regulations from NESHAP Subpart CCCCCC have been added to the new subsection pertaining to this unit (Section III, Subsection D.). The tank has been removed from Appendix U. The permit Table of Contents and the Facility Description, Summary of Emissions Units, and Applicable Regulations in Section I. have been updated to reflect the applicability of NESHAP Subpart CCCCCC.

IV. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. The permitting authority will issue the proposed permit No. 1050231-016-AV, with the changes noted above.