FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
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SECRETARY

May 23, 2013

Electronically sent – Received Receipt requested
kelvin.m.manning@nasa.gov

Mr. Kelvin Manning
Associate Director
Mail Code: AA-B
Kennedy Space Center, FL 32899

Re: Operation of Emergency Engines subject to 40 CFR 63.6640, Subpart ZZZZ
National Aeronautics and Space Administration (NASA), Kennedy Space Center (KSC)
Mail Code: AA-B,
Kennedy Space Center, FL 32899

Dear Mr. Manning:

This letter is to provide confirmation of recent discussions between Florida Department of Environmental Protection Waste and Air Resource Program representatives and NASA's representatives on May 3rd and 9th. The discussions were regarding NASA's operation of nine emergency engines that are subject to the requirements the Reciprocating Internal Combustion Engine (RICE) National Emission Standards for Hazardous Air Pollutants (NESHAP) contained at 40 CFR 63, Subpart ZZZZ. The engines are operated under an agreement with Florida Power and Light (FP&L) Commercial Industrial Load Control (CILC) Program. This program provides for FP&L to dispatch the nine generators located at KSC to shed electrical load during times of demand response.

The nine emergency engines that operate under the FP&L CILC program are subject to the operational requirements of 40 CFR 63.6640, sections (f) (1) through (4) of the RICE NESHAP, specifically the non-emergency operation of the engines as contained in section 4. During the telephone conversation on May 3rd, NASA representatives indicated that FP&L would not provide assurance to NASA that the operation of these engines in the CILC program would be in compliance with the applicable dispatch and operational requirements of section 4 of the RICE NESHAP. Since FP&L would not be able to provide the assurance for these engines, NASA representatives told us that NASA will install emission controls and operate these engines as non-emergency engines.

The Department confirms that the installation of emission controls shall be conducted in accordance with an Air Construction Permit obtained from the Department. The permit is required by Florida Administrative Code (F.A.C.) Chapter 62.210.300(1). Until such time as the

Construction Permit is obtained and the controls are installed, but no later than May 3, 2014, NASA may operate the engines in accordance with the non-emergency provisions contained in 40 CFR 63.6640(f)(4)(i) of the RICE NESHAP.

If you have any questions, please contact Stephen Amirault, 407-897-2942, or by email at stephen.amirault@dep.state.fl.us.

Sincerely,

F. Thomas Lubozynski, P.E.
Waste and Air Resource Programs Administrator

cc: Mr. John Matthews, NASA-KSC: (**John.P.Matthews@nasa.gov**)
Ms. Christine A. Vanaman NASA-KSC: (**christine.a.vanaman@nasa.gov)**
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