



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

October 27, 2008

Mr. Robert W. Schabes
Executive Vice President
Independent Savings Plan Company (ISPC)
1115 Gunn Highway
Odessa, Florida 33556

Dear Mr. Schabes:

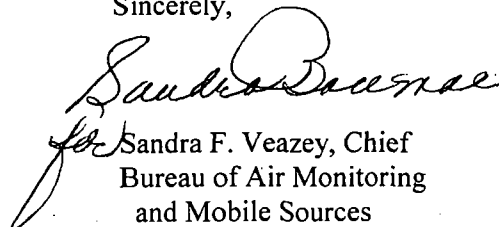
This is to acknowledge that your notification of intent to use the authority of Rule 62-210.310 to operate your facility was received on September 23, 2008. We have assigned ARMS No. 1010507-001 to this facility.

As you know, pursuant to Florida Statutes section 403.814, authority to operate under general permits commences thirty (30) days after receipt of the registration form unless you have been notified by this office that your facility has not shown entitlement to operate pursuant to the rule provisions.

For your information, authority to operate pursuant to Rule 62-210.310 expires after five (5) years. Therefore, a new registration form must be received no later than five (5) years after the date your notice was received as indicated above. If your general permit rule conditions require testing, such testing must be completed within the time frame specified in the rule.

If you have any additional questions, please contact Dickson Dibble at 850/921-9586.

Sincerely,



Sandra F. Veazey, Chief
Bureau of Air Monitoring
and Mobile Sources

SFV/pg

cc: Ms. Danielle Henry, Southwest District

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Bureau of Air Monitoring
& Mobile Sources

RECIPROCATING INTERNAL COMBUSTION ENGINES AIR GENERAL PERMIT REGISTRATION FORM

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

Instructions: To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form)

10/0507-001

Registration Type

Check one:

INITIAL REGISTRATION - Notification of intent to:

Construct and operate a proposed new facility.

Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

RE-REGISTRATION (for facilities currently using an air general permit) - Notification of intent to:

Continue operating the facility after expiration of the current term of air general permit use.

Continue operating the facility after a change of ownership.

Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s): _____

No air operation permits currently exist for this facility.

General Facility Information

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.) ISPC (Independent Savings Plan Co.)	
Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.) ISPC	
Facility Location (Provide the physical location of the facility, not necessarily the mailing address.) Street Address: 1115 Gunn Highway City: Odessa County: <u>Pasco</u> Hillsborough Zip Code: 33556	
Facility Start-Up Date (Estimated start-up date of proposed new facility.)(N/A for existing facility) N/A	

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SEP 23 2008

Owner/Authorized Representative

<u>Name and Position Title</u> (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.) Print Name and Title: Robert W. Schabes, Executive Vice President		
<u>Owner/Authorized Representative Mailing Address</u> Organization/Firm: ISPC Street Address: 6420 Benjamin Road City: Tampa County: Hillsborough Zip Code: 33556 ³³⁶³⁴		
<u>Owner/Authorized Representative Telephone Numbers</u> Telephone: 813-881-1988 ext. 290 Fax: 813-888-8079 Cell phone (optional):		

Facility Contact (If different from Owner/Authorized Representative)

<u>Name and Position Title</u> (Plant manager or person to be contacted regarding day-to-day operations at the facility.) Print Name and Title:		
<u>Facility Contact Mailing Address</u> Organization/Firm: Street Address: City: County: Zip Code:		
<u>Facility Contact Telephone Numbers</u> Telephone: Fax: Cell phone (optional):		

Owner/Authorized Representative Statement

This statement must be signed and dated by the person named above as owner or authorized representative

I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form 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.

I will promptly notify the Department of any changes to the information contained in this registration form.

Robert W. Schabes Signature 9/11/08 Date

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OF H.C.

Fuel Consumption

If this is an **initial registration** for reciprocating internal combustion engine operations, provide an estimate of the total amount of fuel expected to be consumed over a 12-month period. Note: the general permit limits fuel consumption by all reciprocating internal combustion engines at the facility to 20,000 gallons per year of gasoline, 250,000 gallons per year of diesel fuel, 1.15 million gallons per year of propane, 40 million standard cubic feet per year of natural gas, or an equivalent prorated amount if multiple fuels are used

29,870 gallons of diesel maximum estimate (see below for details); actual will be much less if emergency operations are not required

If this is a **re-registration** for reciprocating internal combustion engine operations, provide the highest 12-month total fuel consumption amount, in appropriate units, for the last five years. Indicate the 12-month period over which this fuel consumption occurred.

Description of Facility

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Below, or as an attachment to this form, provide a description of the reciprocating internal combustion engine operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

The facility will operate (the facility is currently being constructed) one diesel fired reciprocating internal combustion engines as provided in the attached Table. There are no other fuel burning sources at the facility. Also provided are the fuel consumption rate and the oxides of nitrogen ("NOx") emission rate at standby as provided by the manufacturer. The 600-kW engine (Kohler 600REOZMB) was manufactured in 2008. Therefore, this generator is subject to 40 CFR 60 Subpart III. The engine displacement is 4.1 liters/cylinder which is less than 30 liters/cylinder; thus, the engine can be registered under this General Permit. Notification details as per 40 CFR 60.4214 are attached. This engine is Tier 2 rated.

The engine is currently operating as an emergency generator as per Chapter 62-210.200(116) which limits operation to no more than 500 hours per year "only when the primary power source for that facility has been rendered inoperable by an emergency situation." In addition Chapter 62-210.300(3)(a)20.b exempts the engines from a permit if one or more generators at the facility consume no more than 32,000 gallons per year of diesel fuel. For this facility, the 500 hour limit is currently more restrictive.

The facility wishes to enroll the engine in a utility-sponsored Demand Response ("DR") Program. The DR Program is currently designed to operate for no more than 88 hours per year with a daily limit of 1 hour if the DR Program is called and a daily maximum of no more than 8 hours. It is expected that the DR Program will be called about 40 to 50 hours per year. Using the 88 hour limit, the estimated additional fuel use is 4,470 gallons or a total of 29,870 gallons per year for 588 hours of operation, assuming 500 hours of emergency operation. Since the DR Program will be called before the primary power source is rendered inoperable, the facility is applying to operate the engine under the General Permit.

The total worst-case NOx emissions from the entire facility are estimated to be 2.5 tpy (see Table) assuming 588 hours of operation of the engine. This is well below the 100 tpy facility limit specified in Rule 62-210.310(2), F.A.C., (2)(a)1. The facility will also not emit 10 tpy or more of any hazardous air pollutant or 25 tpy or more of any combination of hazardous air pollutants. Finally, using the 250,000 gallons fuel limit in the General Permit and the worst-case emissions from the 600-kW engine, the restricted potential to emit for NOx is 20.9 tpy; less than the 100 tpy potential limit.

The facility will closely monitor any future equipment or process changes at the facility. Any changes to the facility will be assessed to determine if the emergency engine can still operate under the General Permit. The facility will also monitor its hourly usage.

ENVIRONMENTAL PROTECTION DEPARTMENT
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ISPC

Engine Make/Model	Output (kW)	Fuel Use (gph)	NO _x (lbs/hr) ¹	Estimate Worst-Case NO _x (tpy) ²
Kohler 600REOZMB	600	50.8	8.5	2.5

¹ Engine Manufactured in 2008 and meets EPA Tier II emission requirements. Assume all NO_x is equal to NO_x + HC or 6.4 g/kw-hr * 600 kW = 3840 g/hr = 8.5 lb/hr

² Assumes 588 hours

REVENUE ACCOUNTING
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REVENUE

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**Notification Requirements for the Caterpillar C15 engine
as per 40 CFR 60.4214**

Manufacture Date: 2008

Engine is subject to 40 CFR 60 Subpart III for Stationary Compression Ignition Internal Combustion Engines since the manufacture date is after 4/1/06 and the order date is after 7/11/05. This engine is Tier II rated.

Name/Address of Owner:

ISPC
6420 Benjamin Road
Odessa, FL 33634

Address of Affected Source:

ISPC
1115 Gunn Highway
Odessa, FL 33556

Engine Information:

Make: Kohler
Model: 600REOZMB
Engine Family: N/A (Specification No. GM50709-GA1)
Serial Number: 2209463
Model Year: 2008
Maximum Engine Power: 600 kW
Per Cylinder Displacement: 4.1 liters/cylinder

Emission Control Equipment: None

Fuel Used: Diesel

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BLUE SKY ENVIRONMENTAL LLC

October 1, 2008

Mr. Dickson Dibble
Florida DEP
3800 Commonwealth Blvd.
MS-77
Tallahassee, FL 32315-3070

**Subject: RICE Air General Permit Registration
ISPC**

Dear Mr. Dibble:

Attached please find an Air General Permit Registration for the reciprocating internal combustion engine ("RICE") to be located at the Independent Savings Plan Co. ("ISPC") in Odessa and a check for \$100. The facility is currently being constructed. The facility wishes to enroll the engine in a utility-sponsored Demand Response ("DR") Program. Since the DR Program will be called before the primary power source is rendered inoperable, the facility is applying to operate the engine under this General Permit. Since the engine was manufactured in 2008 it needs to comply with 40 CFR 60 Subpart III.

As per Rule 62-210.310(2)(c), unless the DEP denies use of the General Permit, the facility may use the Air General Permit 30 days after giving notice to the DEP with the proper registration form and fee. I estimate the date to be November 1, 2008.

If you have any questions or require additional information, please do not hesitate to contact me at 617-834-8408.

Sincerely,
Blue Sky Environmental LLC

Don C. DiCristofaro, CCM
President
Attachments

Cc: A. Jenkins

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UPS CampusShip: View/Print Label

- Print the label(s):** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
- Fold the printed label at the dotted line.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
- GETTING YOUR SHIPMENT TO UPS**
Customers without a Daily Pickup
 - Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
 - Hand the package to any UPS driver in your area.
 - Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return ServicesSM (including via Ground) are accepted at Drop Boxes.
 - To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Customers with a Daily Pickup

- Your driver will pickup your shipment(s) as usual.

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LTR 1 OF 1	
LAURA CLOUTIER 617-398-2014 ENERNOG 75 FEDERAL ST BOSTON MA 02110	<p style="text-align: center;">SHIP TO:</p> MR. DICKSON DIBBLE FLORIDA DEP MS- 77 3800 COMMONWEALTH BLVD. TALLAHASSEE FL 32303-3123
<p style="font-size: 2em;">FL 323 0-01</p> 	<p style="font-size: 3em;">1</p> <p style="font-size: 1.5em;">UPS NEXT DAY AIR</p> TRACKING #: 1Z 665 FIW 01 9908 9966
	
BILLING: P/P	
	
CS 10-6-07. WXPJEP70 82.0A 08/2008	

FLORIDA DEP 3800 COMMONWEALTH BLVD STOP 77 TALLAHASSEE FL 32303-3123	<p>P: PINK S: OUT I: </p> <p style="font-size: 2em;">01G-1011</p> <p>1Z665F1W0199089966 1030</p>
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Cashlisting: 71286 Cashlist Area: 3755 Description: DIV OF AIR RESOURCES MGMT.
 Deposit No: 291184 Date Deposited: 10/02/2008 Contact: E. WALKER

Object	Transmittal	Dep	DDN	Receipt Number	Pre-Numbered Receipt	Name	Check Number	Payment Amount	Reference Account	Payment Number	Remittance Number	Fund	Grant
002272	50783			638830		ENERNOC, INC	15367	\$100.00	1010507-001 From 0571397-001 10/14/2008-IC	902512	797968	PFTF	
Object Code 002272 Subtotal:								\$100.00					
Cashlisting 71286 Total:								\$100.00					