

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 18, 2008

Mr. Tim Hudson MSO Manager Sprint Nextel Corporation 200 Avenue B, Northwest Winter Haven, Florida 33881

Dear Mr. Hudson:

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 October 9, 2008. We have assigned ARMS No. 1050427-001 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

Dellemen

and Mobile Sources

SFV/pg

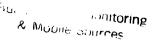
cc: Ms. Danielle Henry, Southwest District

RECIPROCATING INTERNAL COMBUSTION ENGINES AIR GENERAL PERMIT REGISTRATION FORM

OCT 1 5 2008

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)

Registration Type 1050 421-00								
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.) Sprint Nextel Corporation								
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.) Sprint IDEN								
Facility Location (Provide the physical location of the facility, not necessarily the mailing address.) Street Address: 200 Avenue B NW								
City:Winter Haven County:Polk Zip Code:33881								
Facility Start-Up Date (Estimated start-up date of proposed new facility.)(N/A for existing facility) N/A								

DEP Form No. 62-210.920(1)(b) Effective: January 10, 2007

Owner/Authorized Representative

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: Cathy Stafford, East Region EHS Manager

Owner/Authorized Representative Mailing Address

Organization/Firm:Sprint Nextel Corporation

Street Address:965 Keller Road

City: Altamonte Springs

County:Seminole

Zip Code:32714

Owner/Authorized Representative Telephone Numbers

Telephone:407-659-4551

Cell phone (optional):

Fax:404-948-0692

Facility Contact (If different from Owner/Authorized Representative)

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.) Print Name and Title:Tim Hudson, MSO Manager

Facility Contact Mailing Address

Organization/Firm:Sprint Nextel Corporation

Street Address: 200 Avenue B NW

City: Winter Haven

County:Polk

Zip Code:33881

Facility Contact Telephone Numbers

Telephone: (863) 292-2812

Fax:(863) 292-2853

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.

4. 3, 2008

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

47,040 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

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 operates two diesel fired reciprocating internal combution engines as provided in the attached Table. Also provided are the estimated fuel consumption rates and the oxides of nitrogen ("NOx") emission rates. The engines were manufactured in 1999, so they do not need to comply with 40 CFR 60 Subpart IIII, the New Source Performance Standards for Compression Ignition Internal Combustion Engines.

The engines are currently operating as emergency generators 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 32,000 gallon limit is more restrictive.

The facility wishes to enroll the engines 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 7,040 gallons or a total of 47,040 gallons per year for 588 hours of operation. Since the DR Program will be called before the primary power source is rendered inoperable, the facility is applying to operate the engines under the General Permit.

The total worst-case NOx emissions from the engines at the facility are estimated to be 10.2 tpy assuming 588 hours of operation of each 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, the restricted potential to emit for NOx is approximately 54 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 engines can still operate under the General Permit. The facility will also monitor its hourly usage.

COIDA DEPARTE

Sprint IDEN (200 Avenue B. Northwest; Winter Haven) Engine Summary

Engine	Manufacture Date	Output (kW)	Fuel Use (gph) ¹	NO _x (lbs/hr) ²	Estimate Worst-Case NO _x (tpy) ³
Cummins DFED	1999	500	40.0	17.3	5.1
Cummins DFED	1999	500	40.0	17.3	5.1

¹ Estimated using 0.08 gal/kW * 500 kW
² Estimated using EPA AP-42: 5.4 mmBtu/hr * 3.2 lb/mmBtu = 17.3 lb/hr NOx
³ Assumes 588 hours for each engine.

Dibble, Dickson

From:

Dibble, Dickson

Sent:

Tuesday, January 27, 2009 7:47 AM

To:

'Don DiCristofaro'

Cc:

Bowman, Sandy; 'Stafford, Cathy J [FIN]'

Subject:

RE: General Permit Question

Attachments: 1050427-001-AG; SprintNextelCorpWinterHaven.pdf

Tracking:

Recipient

Delivery

Read

'Don DiCristofaro'

Bowman, Sandy

Delivered: 1/27/2009 7:47 AM Read: 1/27/2009 8:06 AM

'Stafford, Cathy J [FIN]'

Good morning Don,

Thank you for your inquiry.

Since the Air General Permit program is an entitlement to operate by rule we do not issue a certificate per se'.

However, once an entitlement has been issued an acknowledgement letter is sent to the entitled facility and addressed to the Facility Contact as listed on the original registration form. In this case the letter was mailed directly to the Winter Haven facility on November 18, 2008 and addressed to Mr. Tim Hudson the MSO Manager. I have attached a scanned a copy of the letter as a .pdf file.

Our intent, in mailing this correspondence directly to the facility is that, should an inspector visit the site and make a request to see the letter then the contact person will/should have it in his/her possession.

I hope this helps. Have a great day!

Sincerely,

Dick

Dickson E. Dibble, ES III

FL Dept of Environmental Protection Div. of Air Resource Management Bureau of Air Monitoring & Mobile Sources Air General Permit Program Tel. (850) 921-9586 FAX (850) 922-6979 ICG-#345

Dickson.Dibble@dep.state.fl.us



Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure

From: Don DiCristofaro [mailto:don@blueskyenviro.com]

Sent: Monday, January 26, 2009 2:26 PM

To: Dibble, Dickson

Cc: 'Stafford, Cathy J [FIN]' **Subject:** General Permit Question

Dick,

First I hope all is well.

I know in the past you have told me no news is good news regarding General Permit registrations but I have a question from a client. Back in October, I submitted the attached registration for a facility in Winter Haven. Recently Malik Pickering from the DEP made a site visit. Sprint wanted to know if they should have a permit or a letter from the DEP authorizing the engines to operate under the General Permit. Hillsborough County used to send out letters when after they processed the General Permit registration. Should we expect a letter from the DEP? Based on our conversations in the past I understand that we do not need a letter or permit.

Thanks, Don (617-834-8408)

Don DiCristofaro, CCM

Blue Sky Environmental LLC | 105 Chestnut Street; Suite 37 | Needham, MA 02492 o: 781-453-1150 | f: 781-453-1142 | m: 617-834-8408 don@blueskyenviro.com

Florida Department of Environmental Protection Cash Receiving Application (CRA) Cashlisting by Deposit #: 291200 thru 291200 Printed: 10/13/2008 12:36:21 PM - Page 13

Cashlisting:

71452

Cashlist Area:

3755

Description: DIV OF AIR RESOURCES MGMT.

Deposit No:

291200

Date Deposited: 10/10/2008

Contact: E. WALKER

		nl Dep DDN	Receipt Number 639600	Pre- Numbered Receipt	NameENERNOC, INC	Check Number	\$100.00	1050427-00/	Payment Number 903758	Remittance Number 798811	Fund PFTF	Grant
					Object Code 002272 Subtotal:	****	\$100.00	10/16/2018-IC				
002278	50893	486281	639535		LVI ENVIRONMENTAL SERVICES INC	1877	\$300.00	50525	903703	798735	APCTF	
	50893	486282	639536		GULF POWER CO	782524	\$300.00	50214	903704	798736	APCTF	
	50893	486283	639537		NICON CONSTRUCTION INC	4576	\$1,000.00	48680	903705	798737	APCTF	
					Object Code 002278 Subtotal:		\$1,600.00					
					Cashlisting 71452 Total:	_	\$1,700.00					