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BUREAU OF AIR REGULATION

August 5, 2009

Jonathan K. Holtom, PE, CPM
Program Administrator Title V Section
Air Permitting
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Rd. Tallahassee, Florida 32399-2400

Re: Request for Additional Information Response for Title V Permit No. 0090006-006-AV FPL Cape Canaveral Plant

Dear Mr. Holtom:

This communication is in response to the Department's request for additional information per the attached letter dated July 10, 2009. A revised Appendix ICE was provided by email to Tom Casio on August 4, 2009. Email communication concerning the diesel generating equipment is attached along with the revised Appendix ICE.

Please do not hesitate to contact me at (321) 637-2251 or Mary Archer at (561) 691-7057 regarding these issues or additional questions.

Sincerely,



David Brad Williams
Plant General Manager
Cape Canaveral Power Plant
Florida Power & Light Company

Cc: Caroline Shine - FDEP Central District

Attachments:

Request for additional information letter from FDEP
Revised Appendix ICE
[3] Emails dated August 4, 2009

**Bcc: Ken Kosky - Golder
Mary Archer – JES/JB
Melissa Hochmuth - PGD/JB**

File: PSN Title V renewal comments

APPENDIX ICE
REQUIREMENTS FOR INTERNAL COMBUSTION ENGINES

This Title V facility contains stationary internal combustion engines that have been exempted from the requirement to obtain an air construction permit because they qualify for one of the categorical exemptions listed in Rule 62-210.300(3)(a), Florida Administrative Code (F.A.C.). However, they are included in this permit as regulated emissions units because they are subject to one or more of the following federal rules:

- 40 CFR 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.
- 40 CFR 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.
- 40 CFR 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The below listed engines are subject to the specified federal rules.

<u>E.U.</u> ID No.	<u>Brief Description of Engine</u>	<u>In-service</u> <u>Date</u>	<u>Cylinder</u> <u>Displacement</u>	<u>Rated</u> <u>Horsepower</u>	<u>Rule</u> <u>Applicability</u>
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The following table also contains equipment that is exempt from the above listed federal rules and is addressed here for clarity.

EU ID no	Engine description	In-service date	Cylinder displacement	Rated hp	Rule applicability
New	RICE	Mfgr Date: 2006(month not labeled) purchased 11/08 In-service will occur in mid 2009	15.8 liter	670	ZZZZ and Rule 62-210.300(3)(a)20 Notification required
New	CI-ICE	Mfgr Date: 8/5/05 purchased 11/08 In-service will occur in mid 2009	1.6 liter	40	Rule 62-210.300(3)(a)20 Federal rules not applicable Equipment included on "Insignificant List"
New	CI-ICE	Mfgr Date: 8/17/05 purchased 11/07 In-service will occur in mid 2009	1.6 liter	40	Rule 62-210.300(3)(a)20 Federal rules not applicable Equipment included on "Insignificant List"

Revised data 08/04/2009

The engines listed above are currently demonstrating compliance with the emissions limitations of the applicable federal rule through the retention of a manufacturer's certification statement. So long as that certification is able to be retained, no additional compliance demonstration is required. At such time that the manufacturer's certification is no longer valid (i.e. due to operation or maintenance practices that are inconsistent with the manufacturer's recommendations), the permittee shall begin demonstrating compliance with the standards listed in the applicable federal rule (included in the appendices as an enforceable part of this permit) in a manner that is prescribed by that rule.

Archer, Mary

From: Archer, Mary
Sent: Tuesday, August 04, 2009 3:41 PM
To: Cascio, Tom
Cc: Archer, Mary
Subject: RE: Older Engines - Cape Canaveral

Tom

EU004 equipment is existing equipment for Federal regulations 40 CFR Subpart IIII, 40 CFR Subpart JJJJ, and 40 CFR Subpart ZZZZ, therefore these regulations are not applicable.

EU005 Diesel Generators were replaced with the generators listed in Appendix ICE of the application.
EU005 was replaced with "New" EU in the application.

Do you need additional information? Thanks, Mary

Mary J. Archer, QEP
Project Manager
FPL Environmental Services
office: 561-691-7057
Cell: 561-758-3760

From: Cascio, Tom [mailto:Tom.Cascio@dep.state.fl.us]
Sent: Tuesday, August 04, 2009 3:14 PM
To: Archer, Mary
Subject: Older Engines

Hi Mary – see last e-mail. Can you send me a short blurb on non-applicability of new federal rules for the following older unregulated units?

004	Internal Combustion Engines which drive Compressors and Water Pumps and Similar Equipment
005	Emergency Diesel Generators

Tom Cascio, D.B.A., CPM
Engineering Specialist IV

Archer, Mary

From: Cascio, Tom [Tom.Cascio@dep.state.fl.us]
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Tom Cascio, D.B.A., CPM
Engineering Specialist IV
Title V Section
Florida Department of Environmental Protection
850-921-9526

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

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Archer, Mary

From: Cascio, Tom [Tom.Cascio@dep.state.fl.us]
Sent: Tuesday, August 04, 2009 2:59 PM
To: Archer, Mary
Subject: RE: Request for Additional Information - FPL - Cape Canaveral Plant (0090006-006-AV)

Thanks, Mary – this looks good – I'll review, etc. Thanks for the fast response – hope everything is going OK.

Tom

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From: Archer, Mary [mailto:Mary.Archer@fpl.com]
Sent: Tuesday, August 04, 2009 2:49 PM
To: Cascio, Tom
Cc: Archer, Mary
Subject: Request for Additional Information - FPL - Cape Canaveral Plant (0090006-006-AV)

Tom,

Attached is the Appx ICE with a minor revision. Did the department want something additional to this form? I followed the guidance DARM-PER-44 issued by Joe Kahn on Sept 3, 2008.

I had considered the application as Notification for the Subpart ZZZZ. Do you need a separate letter?

Please contact me for additional information.

Thanks, Mary

Mary J. Archer, QEP
Project Manager
FPL Environmental Services
office: 561-691-7057
Cell: 561-758-3760