

Heron, Teresa

From: John_Hampp@fpl.com
Sent: Wednesday, January 30, 2008 4:18 PM
To: Heron, Teresa
Subject: RE: Response to 63 ZZZZ and 60 IIII Emergency Diesel Generator
Attachments: Attachment 3.pdf; Attachment 1.pdf; Attachment 2.pdf; Attachment 4.pdf

Ms. Heron,

I have completed the review of the Emergency Diesel generators for the Turkey Unit 5 project to complete the Below are the responses regarding the Emergency Diesel Generators at the FPL Turkey Point Plant.

1) Proof of order date:

a. Please see attachment 1, which is a scanned copy of the purchase order. All the emergency diesel generators delivered to FPL in 2006 were ordered in 2004. The diesel generators for Turkey Unit 5 were originally delivered to Sanford Plant and subsequently relocated to Turkey Point for protection of Unit 5 as protection from a loss of grid event.

2) Define type of engine:

a. Please see attachment 2, which is a scanned copy of the performance data for an identical generator that was installed at the FPL Manatee Plant.

3) Provide the rationale for non-applicability of NESHAP Subpart ZZZZ:

A review of the standard identified that these stationary emergency diesel generators are subject to the initial RICE notification requirements of 40 CFR 63.6645(d). These RICE however, are not subject to any other requirements of this subpart (40 CFR subpart ZZZZ) or the general provisions (40 CFR part 63, subpart A).

a. Please see attachment 3, which is the scanned Applicability Flowchart for NESHAP for Reciprocating Internal Combustion Engines (RICE) 40 CFR part 63, subpart ZZZZ. The flowchart states out stationary RICE must meet the initial notification requirements of 40 CFR 63.6645(d). The emergency RICE is not subject to any other requirements of this subpart or the General Provisions (40 CFR part 63, subpart A)

b. 63.6645(d) states if you are required to submit an Initial Notification but are otherwise not affected by the requirements of this subpart in accordance with 63.6590(b) your notification should include the following information in 63.9(b) (2)(i) through (v), and a statement that your stationary RICE has no additional requirements and explain the basis of the exclusion (for example that it operates exclusively as an emergency stationary RICE). 40 CFR 63.6675 specifies Emergency Diesel Generators are subject to subpart ZZZZ. Please refer to attachment 4 has been provided as documentation of the notification that had been made to the Department regarding the applicability requirements.

If you have any questions, or if you require additional information, please call me at 561-691-2894

1/31/2008

John Hampp

Principal Environmental Specialist

FPL

561-691-2894

john_hampp@fpl.com

(See attached file: Attachment 3.pdf)(See attached file: Attachment 1.pdf)(See attached file: Attachment 2.pdf).(See attached file: Attachment 4.pdf)

▼ "Heron, Teresa" <Teresa.Heron@dep.state.fl.us>

"Heron, Teresa"

To: John_Hampp@fpl.com

<Teresa.Heron@dep.state.fl.us>cc:

Subject: RE: Response to 63 ZZZZ and 60 IIII
Emergency Diesel Generator

01/17/2008 02:36 PM

We are finalizing this Title V revision. Have you received the information you were waiting for?

Thanks, Teresa

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.

From: John_Hampp@fpl.com [mailto:John_Hampp@fpl.com]

Sent: Monday, November 19, 2007 5:16 PM

To: Heron, Teresa

Subject: Re: Response to 63 ZZZZ and 60 IIII Emergency Diesel Generator

Teresa,

I have received a verbal confirmation from the folks in charge that these were the generators that were shipped to Sanford Plant that were ordered in 2004 but never installed there. They are being shipped to PTF for installation there as the Emergency Diesel Generators (EDG's) for unit 5. I expect to receive the information tomorrow on when they were ordered and their manufacture date.

Unless I receive further information that is contrary to what I have received by our engineering folks, please consider that these EDG's would not be regulated under 40 CFR Part 60 IIII as they are exempted by having been manufactured prior to the April 1, 2006 date or odered prior to that date. thus they would not be subject to 40 CFR 60.4200 - 4219

1/31/2008