

# 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

August 29, 2008

*Electronically Sent – Received Receipt Requested.*

Mr. Paul Plotkin, Plant General Manager ([pplotkin@fpl.com](mailto:pplotkin@fpl.com))  
Manatee Plant  
19050 State Road 62  
Parrish, FL 34219-9220

Re: DEP File No. 0810010-013-AV  
Title V Air Operation Permit Renewal  
Request for Additional Information

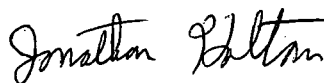
Dear Mr. Plotkin:

The Florida Department of Environmental Protection has reviewed your application for a renewal of the Title V Air Operation Permit for the Manatee Plant. However, we must deem your application *incomplete*, because we need further information relative to the following items:

1. Please provide an assessment as to the applicability of the following federal regulations with regard to the emergency generators at the plant:
  - 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.
2. In order to evaluate your requested change to the excess emissions provisions for Unit 3, additional information will be needed to determine whether this change to the methods of operation could result in an actual emissions increase, and to what extent. We will need historical data documenting the frequency and duration of start-up times, the excess emissions recording practices, the actual emissions recorded during startups events, the manufacturer's specifications for startup, etc. Because the Title V permit renewal that this air construction permit change request was submitted concurrently with contains an Acid Rain part that must be final and effective by January 1, 2009, it will be very difficult to adequately address the construction permit change and be able to complete the Title V and Acid Rain renewal in time to meet the January 1 deadline. Therefore, in order to ensure the successful issuance of the Acid Rain part by the January 1 deadline, it is our recommendation that the Air Construction permit revision request be separated from the Title V permit renewal request. If it is desired to keep the Title V permit and the Air Construction permit requests tied together, then the Acid Rain portion of the permit will need to be issued separately from the Title V permit under a stand-alone Public Notice. Then, when the issues surrounding the excess emissions change request are resolved, the Title V permit can be issued concurrently with the Air Construction permit under a separate Public Notice. Please provide either a statement that it is agreeable to separate the Air Construction permit and issue the Title V and Acid Rain permits together or a statement that you would prefer to issue the Acid Part separately and keep the Air Construction permit and the Title V permit together.

When we receive this information, we will continue processing your applications. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Sincerely,



Jonathan K. Holtom, P.E., CPM  
Acting Program Administrator  
Title V Section

Cc: Mr. Kennard Kosky, Golder Associates: [kkosky@golder.com](mailto:kkosky@golder.com)  
Ms. Mara Nasca, Southwest District Office: [mara.nasca@dep.state.fl.us](mailto:mara.nasca@dep.state.fl.us)  
Ms. Katy Forney, EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)

**Walker, Elizabeth (AIR)**

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**From:** Walker, Elizabeth (AIR)  
**Sent:** Friday, August 29, 2008 5:18 PM  
**To:** 'PLOTKIN@FPL.COM'  
**Cc:** 'kkosky@golder.com'; Nasca, Mara; 'Forney.Kathleen@epamail.epa.gov'; Holtom, Jonathan; Cascio, Tom  
**Subject:** RAI - FPL - Manatee Plant  
**Attachments:** RAI0810010-013-AV.pdf

Dear Sir/Madam:

**Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).**

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

*Elizabeth Walker*  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

## Walker, Elizabeth (AIR)

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**From:** Paul\_Plotkin@fpl.com  
**Sent:** Friday, August 29, 2008 5:27 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** RAI - FPL - Manatee Plant

### Return Receipt

Your RAI - FPL - Manatee Plant  
document:  
was [Paul\\_Plotkin@fpl.com](mailto:Paul_Plotkin@fpl.com)  
received by:  
at: 08/29/2008 05:26:26 PM

## Walker, Elizabeth (AIR)

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**From:** Mail Delivery System [MAILER-DAEMON@sophos.golder.com]  
**Sent:** Friday, August 29, 2008 5:19 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** Successful Mail Delivery Report  
**Attachments:** Delivery report; Message Headers

This is the mail system at host sophos.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<[kkosky@golder.com](mailto:kkosky@golder.com)>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent  
48B867BA\_24318\_189\_6 D351E119FE74

## Walker, Elizabeth (AIR)

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**From:** Nasca, Mara  
**Sent:** Friday, August 29, 2008 5:25 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** RE: RAI - FPL - Manatee Plant

Thanks Elizabeth – have a happy and safe holiday !

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**From:** Walker, Elizabeth (AIR)  
**Sent:** Friday, August 29, 2008 5:18 PM  
**To:** 'PLOTKIN@FPL.COM'  
**Cc:** 'kkosky@golder.com'; Nasca, Mara; 'Forney.Kathleen@epamail.epa.gov'; Holtom, Jonathan; Cascio, Tom  
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## Walker, Elizabeth (AIR)

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The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250  
OK, sent 48B867B8\_25055\_5929\_1 823AB1E42E7