From: Holtom, Jonathan
To: Maxwell, Mary; Plotkin, Paul; Zuczek, Jeffrey
Cc: Arif, Syed; Scearce, Lynn; Grondahl, Max; Archer, Mary; Richardson, Adam; Hejazi, Abdy
Subject: RE: Acknowledgement of Temporary Donkey Boiler for Fuel Oil Heating
Date: Monday, February 03, 2014 3:07:13 PM

This change will most likely be OK, but you will need to pay more attention to the applicability of 40 CFR 60, Subpart Dc. Units may utilize the categorical exemptions contained in Rule 62-210.300(3), F.A.C., provided the unit is not subject to any unit specific applicable requirements. Under Subpart Dc, boilers greater than 10 MMBtu/hr are potentially subject to regulation; however, temporary boilers are specifically exempted. To qualify as a temporary boiler, the following definition from Subpart Dc must be met:

Temporary boiler means a steam generating unit that combusts natural gas or distillate oil with a potential SO_2 emissions rate no greater than 26 ng/J (0.060 lb/MMBtu), and the unit is designed to, and is capable of, being carried or moved from one location to another by means of, for example, wheels, skids, carrying handles, dollies, trailers, or platforms. A steam generating unit is not a temporary boiler if any one of the following conditions exists:

(1) The equipment is attached to a foundation.

(2) The steam generating unit or a replacement remains at a location for more than 180 consecutive days. Any temporary boiler that replaces a temporary boiler at a location and performs the same or similar function will be included in calculating the consecutive time period.

(3) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least 2 years, and operates at that facility for at least 3 months each year.

(4) The equipment is moved from one location to another in an attempt to circumvent the residence time requirements of this definition.

If for some reason the above definition can not be met, then the rental boilers greater than 10 MMBtu/hr will be subject to regulation under Subpart Dc and Rule 62-296.405, F.A.C., which in turn would required an air construction permit followed by an air operation permit revision. If it is the intention to comply with the definition of a temporary boiler, please be sure to maintain adequate records to document the duration of time that each of the boilers remain on-site.

Jon Holtom, P.E., CPM
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Air Permitting and Compliance
(850) 717-9079 (Internal 59579)
FAX: (850) 717-9097
Email: jon.holtom@dep.state.fl.us

From: Maxwell, Mary [mailto:Mary.Maxwell@fpl.com]
Sent: Monday, February 03, 2014 10:55 AM

To: Holtom, Jonathan; Plotkin, Paul; Zuczek, Jeffrey
Cc: Arif, Syed; Scearce, Lynn; Grondahl, Max; Archer, Mary; Richardson, Adam; Hejazi, Abdy
Subject: RE: Acknowledgement of Temporary Donkey Boiler for Fuel Oil Heating

Due to the availability of the rental equipment, the temporary oil-filled boiler may be sized up, to a 350 HP, 12MBTU unit. It will still qualify as insignificant activity and incorporated at next renewal if required.

Thank you,

Mary Maxwell
Florida Power & Light
Manatee Plant

From: Holtom, Jonathan [mailto:Jonathan.Holtom@dep.state.fl.us]
Sent: Thursday, January 30, 2014 3:13 PM
To: Maxwell, Mary; Plotkin, Paul; Zuczek, Jeffrey
Cc: Arif, Syed; Scearce, Lynn; Grondahl, Max; Archer, Mary; Richardson, Adam
Subject: RE: Acknowledgement of Temporary Donkey Boiler for Fuel Oil Heating

Thank you for this notification of a new, currently temporary, Insignificant activity at the Manatee power Plant. This letter will be retained in our files for reference. If it is determined that this will become a regular seasonal activity, please be sure to request that we add it to your list of Insignificant Activities the next time the Title V permit is opened.

Jon Holtom, P.E., CPM
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Air Permitting and Compliance
(850) 717-9079 (Internal 59579)
FAX: (850) 717-9097
Email: jon.holtom@dep.state.fl.us

From: Maxwell, Mary [mailto:Mary.Maxwell@fpl.com]
Sent: Thursday, January 30, 2014 8:55 AM
To: Holtom, Jonathan; Plotkin, Paul; Zuczek, Jeffrey
Cc: Arif, Syed; Scearce, Lynn; Grondahl, Max; Archer, Mary; Richardson, Adam
Subject: RE: Acknowledgement of Temporary Donkey Boiler for Fuel Oil Heating

Please see attached in response to message below-
Thank you,

Mary Maxwell
Florida Power & Light
Manatee Plant

From: Holtom, Jonathan [mailto:Jonathan.Holtom@dep.state.fl.us]

Sent: Tuesday, January 28, 2014 11:05 AM
To: Plotkin, Paul; Zuczek, Jeffrey
Cc: Arif, Syed; Scearce, Lynn; Maxwell, Mary; Grondahl, Max
Subject: Acknowledgement of Temporary Donkey Boiler for Fuel Oil Heating

Dear Mr. Plotkin,

On January 23, 2014, we received your attached letter informing us that you intend to operate a temporary oil-fired boiler that you believe meets the requirements of Rule 62-212.300(3)(a)34., F.A.C., which exempts you from air construction permitting requirements. We acknowledge receipt of your letter and will place it in our files.

Because this activity will be performed at a Title V permitted facility, it will need to be addressed in some fashion within the Title V permit. If the potential emissions from the operation of this rental boiler meet the provisions of Rule 62-213.430(6), F.A.C. (see below), then a notice to the Department to that effect with a request to add the activity to either the Insignificant or Unregulated Appendix the next time the permit is opened will be sufficient. (Units/activities with no unit specific applicable requirements that potentially exceed the insignificant levels in 62-213.430(6) are considered Unregulated activities.) Keep in mind, however, that any temporary boiler that remains on-site for greater than 12 months will likely be subject to 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. To avoid becoming subject to the requirement, it would have to be clear in the Insignificant or Unregulated Appendix that operation of a fuel oil heater/boiler is infrequent or seasonal and never more than 12 months of continuous operation.

(6) Insignificant Emissions Units or Pollutant-Emitting Activities.

(a) All requests for determination of insignificant emissions units or activities made pursuant to paragraph 62-213.420(3)(n), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to this chapter. Insignificant emissions units or activities shall be approved by the Department consistent with the provisions of paragraph 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to this rule.

(b) An emissions unit or activity shall be considered insignificant if all of the following criteria are met:

1. Such unit or activity would be subject to no unit-specific applicable requirement.
2. Such unit or activity, in combination with other units and activities proposed as insignificant, would not cause the facility to exceed any major source threshold(s) as defined in subparagraph 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s).
3. Such unit or activity would neither emit nor have the potential to emit:
   a. 500 pounds per year or more of lead and lead compounds expressed as lead;
   b. 1,000 pounds per year or more of any hazardous air pollutant;
   c. 2,500 pounds per year or more of total hazardous air pollutants; or
   d. 5.0 tons per year or more of any other regulated pollutant.

Please don't hesitate to contact me if you have any questions.

Jon Holtom, P.E., CPM
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Air Permitting and Compliance
(850) 717-9079 (Internal 59579)
FAX: (850) 717-9097
Email: jon.holtom@dep.state.fl.us

From: Maxwell, Mary [mailto:Mary.Maxwell@fpl.com]
Sent: Thursday, January 23, 2014 11:14 AM
To: Koerner, Jeff
Cc: Holtom, Jonathan
Subject: Request for exemption: Temporary donkey Boiler for Fuel Oil Heating

Please see the attached for a Request for exemption: Temporary Donkey Boiler at FPL Manatee Plant DARM Facility ID 0810010. A hard copy will follow.

Thank you,

Mary Maxwell
FPL Manatee plant
941-776-5278