

UTILITY BOARD OF THE CITY OF KEY WEST DB

POST OFFICE DRAWER 6100

KEY WEST, FLORIDA 33041-6100

May 6, 1993



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Mr. Clair Fancy
 Department of Environmental Regulations
 Twin Towers Office Building
 2600 Blairstone Road
 Tallahassee, FL 32399-2400

Dear Mr. Fancy:

During the PSD application (PSD-FL-135) process for the Medium Speed Diesel Units (AC-44-152197) at the Stock Island Power Plant in 1988, R.W. Beck and Associates identified the peaking diesels at Stock Island (AO-44-175804). However, "R.W. Beck" failed to include them in the impact modeling since they were not considered a major source. It was felt that if they were modeled their impact would be insignificant.

Subsequent to preparation of the PSD application in connection with the relocation of the combustion turbine from the Key West Power Plant to the Stock Island Power Plant additional modeling was performed.

One part of the analysis, the downwash analysis, included modeling the effects of building wakes on stack emission impacts. Inclusion of the high speed diesels in the downwash analysis revealed the three hour and twenty-four hour impacts unacceptable. The significant impact of the emissions from the high speed diesels appears to be related to two major factors: the low stack configuration and the relative location of the high speed diesels to the medium speed diesel building and the No. 6 oil tank.

R. W. Beck's modeling indicates that an acceptable impact could be achieved by limiting operating hours on all Stock Island high speed diesels to the hours of 9:00 a.m. to 5:00 p.m. C.E.S. will implement this schedule and is currently exploring the costs associated with relocating the high speed diesels.

If I can be of further assistance, please do not hesitate to call.

Sincerely,

UTILITY BOARD - CITY OF KEY WEST
 "CITY ELECTRIC SYSTEM"
 Robert R. Padron, General Manager


 Carl R. Jansen, Jr.
 Production Manager

CRJ/dh

cc:

R. Padron, General Manager
 J. Greenshields, Environmental Supervisor
 File (2)

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