

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

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MIKE HENDRISON

R.W. BECK
DENVER

June 25, 1991

JUL 1 1991

PRODUCTION DEPT.

Mr. L. T. Curry, Jr.
Utility Board of the City
of Key West
Post Office Drawer 6100
Key West, FL 33041-6100

Dear Mr. Curry:

Re: Relocation of Your General Electric Frame 5 (22 MW) Gas Turbine

This letter responds to your informal inquiry as to whether a construction permit is required to relocate your General Electric Frame 5 (22 MW) gas turbine from your Key West Power Plant to your Stock Island Power Plant. I concur with the oral opinion given to you by Cleve Holladay that the relocation of the turbine cannot be accomplished by amending the present air operating permit. Therefore, a construction permit is required.

Based on our calculations and information in our permitting files, the installation of the gas turbine at the Stock Island Plant would be a major modification as a result of significant net emission increases of SO₂ and NO_x. Based on information contained in our permit files, the Stock Island Plant is a major facility. Since the installation of the gas turbine is projected to be a major modification to a major facility, it would then be subject to Prevention of Significant Deterioration (PSD) requirements under Rule 17-2.500, F.A.C. In order to be exempt from the PSD rules, the turbine would have to be owned by the Utility Board and located on property contiguous or adjacent to the Stock Island Plant. Based on the information provided in your April 8, 1991 letter, the distance between the turbine's present location at the Key West Power Plant and the Stock Island Plant is approximately four miles and the facilities are not adjacent or contiguous.

For your convenience, I am enclosing copies of Chapter 17-2, F.A.C.; Chapter 17-4, F.A.C.; and a construction permit application. For PSD and BACT requirements, please refer to Rules 17-2.500 and 17-2.630, F.A.C. See Rule 17-4.050(4)(a), F.A.C., regarding our construction permit fees. It is expected that these fees will increase around November 1, 1991, so you should file your

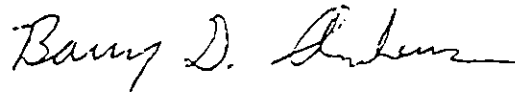
Mr. L. T. Curry, Jr.
Page Two
June 25, 1991

construction permit before that time. Please include all calculations, assumptions, and reference materials used in preparing the application and provide us six sets of the application. All required air dispersion modeling should be provided to us in both paper format and computer disk format. A professional engineer (PE) registered in Florida will have to seal the permit application and all technical information associated with it.

Because you did not seek a declaratory statement from the Department under Section 120.565, F.S. and Part III of Chapter 17-103, F.A.C., this opinion is not binding on you, the public, or the Department. Therefore, this letter does not constitute final agency action.

If you have any questions please call me or Cleve Holladay at (904)488-1344 or Gary Smallridge at (904)488-9730.

Sincerely,



fi C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/CH/kt

enclosures

cc: D. Knowles, SF District
G. Smallridge, OGC