

Florida Department of Environmental Protection

Memorandum

TO: Joseph Kahn, Division of Air Resource Management
THROUGH: Trina Vielhauer, Bureau of Air Regulation *TV*
THROUGH: Al Linero, Special Projects Section *AL*
FROM: David Read *DR*
Air Construction Permit No. 0870003-010-AC
Keys Energy Services
SUBJECT: Stock Island Power Plant
Biodiesel Test Firing

DATE: February 20, 2009

Attached for your review is the final permit package for the subject facility. The package consists of the following items:

- Final Determination
- Final Notice; and,
- Final Permit.

This final permit is to allow the test firing of biodiesel fuel (~250,000 gallons) in addition to the currently used Number (No.) 2 distillate fuel oil in combustion turbines Nos. 1, 2, and 3 at the Stock Island Power Plant. The purpose of the test is to assess operational and emissions issues when firing the biodiesel fuel. The power plant is located 6900 Front Street Extended, Stock Island, Monroe County, Florida. The Department distributed an "Intent to Issue Permit" package on September 30, 2008. The applicant published the "Public Notice of Intent to Issue" in the Key West Citizen on October 19, 2008 with proof of publication provided to the Department on February 13, 2009. No comments were received from the applicant, the Environmental Protection Agency, or the public at large concerning the intent package. No changes were made to the draft air construction permit.

I recommend your approval of the attached Final Permit.

Attachments

FINAL DETERMINATION

Air Construction Permit
Project No. 0870003-010-AC
Keys Energy Services
Stock Island Power Plant
Biodiesel Test Firing

PERMITTEE

Keys Energy Services
101 James Street
Post Office Box 6100
Key West, Florida 33401-6100

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, Special Projects Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

DEP File No. 0870003-010-AC
Biodiesel Test Firing
Combustion Turbines (CT) Nos. 1, 2 and 3
Monroe County

This permit authorizes the test firing of a biodiesel fuel (~250,000 gallons) in combustion turbines (CT) Nos. 1, 2 and 3 at the Stock Island Power Plant to assess operational and emissions issues.

NOTICE AND PUBLICATION

The Department distributed a Written Notice of Intent to Issue Draft Air Permit on September 30, 2008. The Public Notice of Intent to Issue Draft Air Permit was published on October 19, 2008 in the Key West Citizen with the department receiving proof of publication on February 13, 2009.

COMMENTS

No comments were received by the Department.

CONCLUSION

The final decision by the Department is to issue the permit with no changes.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

Electronically Sent – Received Receipt Requested.

In the Matter of an
Application for Permit by:

Keys Energy Services
101 James Street
Post Office Box 6100
Key West, Florida 33041-6100

DEP File No. 0870003-010-AC
Stock Island Power Plant
Combustion Turbines (CT) Nos. 1, 2 and 3
Biodiesel Test Firing
Monroe County, Florida

Authorized Representative:

Mr. Edward Garcia, Director of Generation

Enclosed is Final Air Construction Permit DEP File No. 0870003-010-AC that authorizes the test firing of a biodiesel fuel (~250,000 gallons) in combustion turbines (CT) Nos. 1, 2 and 3 at the Stock Island Power Plant to assess operational and emissions issues. The facility is located at 6900 Front Street Extended, Stock Island, Monroe County, Florida. As noted in the attached Final Determination, no changes were made to the Draft Permit. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the Department of Environmental Protection (Department) in the Legal Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty (30) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersign duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit and Final Determination) was sent by electronic mail (with receipt requested), or a link to these documents available electronically on a publicly accessible server, before the close of business on 2/24/09 to the person(s) listed below.

Edward Garcia, Keys Energy Services: edward.garcia@keysenergy.com

Kennard F. Kosky, P.E., Golder Associates, Inc.: kkosky@golder.com

A. J. Satyal, DEP South District Office: ajaya.satyal@dep.state.fl.us

Katy Forney, EPA Region 4: forney.kathleen@epa.gov

Ms. Vickie Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for read file)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

2/24/09
(Date)



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor
Jeff Kottkamp
Lt. Governor
Michael W. Sole
Secretary

PERMITTEE:

Keys Energy Services
1001 James Street
Post Office Box 6100
Key West, Florida 33041-6100

Authorized Representative:
Edward Garcia, Director of Generation

DEP File No. 0870003-010-AC
Stock Island Power Plant
Combustion Turbines (CT) Nos. 1, 2 and 3
SIC No. 4911
Biodiesel Test Firing
Expires December 31, 2010

PROJECT AND LOCATION

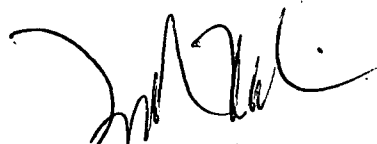
This permit authorizes Keys Energy Services to conduct test firing of up to 250,000 gallons of biodiesel fuel in CT Nos. 1, 2 and 3 at the Stock Island Power Plant located 6900 Front Street Extended, Stock Island, Key West, Monroe County, Florida. The map coordinates are: UTM Zone 17, 425.65 km East and 2716.67 km North.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the work specified in accordance with the conditions of this permit and as described in the application, approved drawings, plans and other documents on file with the Department. This permit supplements the current Title V operations permit (Permit No. 0870003-008-AV) for the subject emissions units and does not alter any requirements from previously issued air permits.

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- Section 2. *Administrative Requirements*
- Section 3. Emissions Unit (EU) Specific Conditions EU 007 - CT No. 1
- Section 4. Emissions Units Specific Conditions EU 008 and 009 - CT Nos. 2 and 3
- Section 5. Emissions Unit Specific Conditions EU 010 - Unregulated Emissions Units and Activities
- Section 6. Appendices



Joseph Kahn, Director
Division of Air Resources Management

2/24/09

(Date)

SECTION I. FACILITY INFORMATION (FINAL)

FACILITY DESCRIPTION

Keys Energy Services operates the Stock Island Power Plant located 6900 Front Street Extended, Stock Island, Key West, Monroe County, Florida.

This facility consists of six key regulated emission units with a total generating capacity of 128.7 megawatt (MW). There are two regulated diesel generators, four simple cycle combustion turbines, and miscellaneous unregulated units. To reduce pollution, a combination of control techniques are used including water injection, ignition timing retardation and low sulfur fuel oil.

EMISSION UNITS

This facility consists of the following emission units (EU) listed below.

<u>E.U. ID No.</u>	<u>Brief Description</u>
005	8.8 MW Medium Speed Diesel Generator [Unit #1; EPA ID #D-1]
006	8.8 MW Medium Speed Diesel Generator [Unit #2; EPA ID #D-2]
007	23.5 MW Simple Cycle Combustion Turbine [CT-1]
008	19.77 MW Simple Cycle Combustion Turbine [CT-2]
009	19.77 MW Simple Cycle Combustion Turbine [CT-3]
010	Unregulated Emissions Units
011	48.00 MW Simple Cycle Combustion Turbine [CT-4]
Emission units 002, 003, 004 and 012 were moved to emissions unit 010.	

PROJECT

This project will involve the test firing of up to 250,000 gallons of biodiesel fuel (B100 or blends) in combustion turbines (CT) Nos. 1, 2 and 3 at the Stock Island Power Plant to determine performance and emissions information. These CT are General Electric (GE) Frame 5 models that utilize No. 2 distillate fuel oil (0.05 percent sulfur content) and use water injection to control nitrous oxide (NO_x) emissions. The following emissions units are affected by this permit.

<u>ID No.</u>	<u>Emission Units Description</u>
007	23.5 MW Simple Cycle Combustion Turbine [CT-1]
008	19.77 MW Simple Cycle Combustion Turbine [CT-2]
009	19.77 MW Simple Cycle Combustion Turbine [CT-3]
010	Unregulated Emission Units and Activities*

* Either one of the two 500,000 gallon storage tanks included in EU ID No. 010 that currently store No. 2 fuel oil and provide fuel during operation of CT Nos. 1, 2 and 3 will be used to store the biodiesel during the test firing.

REGULATORY CLASSIFICATION

Regulatory classification and applicable requirements are listed in the applicable Title V Operation Permit and the previously-issued construction permit.

Title III HAP: This facility is not a "Major Source" of hazardous air pollutants (HAP).

Title IV Acid Rain: The facility operates units subject to the Acid Rain provisions of the Clean Air Act (CAA).

SECTION I. FACILITY INFORMATION (FINAL)

Title V Major Source: The facility is a Title V or "Major Source" of air pollution because the potential emissions of at least one regulated pollutant exceed 100 tons per year (tpy). Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂) and volatile organic compounds (VOC).

PSD Major Source: The project is located in an area designated as "attainment," "maintenance" or "unclassifiable" for each pollutant subject to the National Ambient Air Quality Standard (NAAQS). The facility is not one of the 28 Prevention of Significant Deterioration (PSD) source categories, and is subject to the PSD applicability threshold of 250 tpy. Potential emissions of at least one regulated pollutant exceed 250 tpy. Therefore, the facility is classified as a PSD-major source of air pollution with respect to Rule 62-212.400, Florida Administrative Code (F.A.C.), PSD of Air Quality.

NSPS Sources: The combustion turbines specified in this project, are subject to regulation under the new Source Performance Standards (NSPS) for Stationary Gas Turbines, 40 Code of Federal Regulation (CFR), Subpart GG.

NESHAP: The National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart YYYY for combustion turbines does not apply because the facility is not a major source of HAP.

Siting: The facility is not a steam electrical generating plant and is not subject to the power plant siting provisions of Chapter 62-17, F.A.C.

RELEVANT DOCUMENTS

- Current Title V Operation Permit 0870003-008-AV issued on December 27, 2007;
- Application submitted by Keys Energy Services, received April 22, 2008;
- Department's Technical Evaluation and Final Determination and draft permit dated September 30, 2008; and,
- Department final permit package dated February 20, 2009

SECTION II. ADMINISTRATIVE REQUIREMENTS (FINAL)

GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. **Permitting Authority:** All documents related to applications for permits to construct, modify or operate this emissions unit shall be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection ("Department"), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-0114. Copies of these documents shall be submitted to the Compliance Authority.
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications should be submitted to the Air Resource Section of the South District Office, Florida Department of Environmental Protection, 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3381. The phone number is 239/332-6975 and the fax number is 239/332-6969.
3. **Terminology:** The terms used in this permit have specific meanings as defines in the applicable chapters of the Florida Administrative Code (F.A.C.).
4. **General Conditions:** The owner and operator are subject to, and shall operate under, the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160, F.A.C.]
5. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise indicated in this permit, the construction and operation of this project shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
6. **Permit Expiration:** For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080 and 62-210.300(1), F.A.C.]
7. **New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
8. **Modifications:** No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
9. **Title V Permit:** The scope of the temporary project included in this permit (biodiesel test firing in CT Nos. 1, 2 and 3) is to develop information (operational and pollutant emissions) in support of another project requesting permanent use of biodiesel in the CT. Any future authorization to fire biodiesel fuel at the facility would require a revision to the Title V air operation permit. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

EU 007 - CT NO. 1

This section of the permit addresses the following emissions unit:

ID No.	Emission Unit Description
007	23.5 MW Simple Cycle Combustion Turbine [CT-1]

ADMINISTRATIVE REQUIREMENTS

Previous Permit Conditions: This permit authorizes the firing of up to 250,000 gallons of biodiesel as an alternative fuel in EU 007. The biodiesel can be fired as 100 percent biodiesel or as a blend with No. 2 distillate fuel oil. However, no more than a total 250,000 gallons of biodiesel can be fired in this CT or in combination with in any other CT at the Stock Island Power Plant during the biodiesel test firing project. The following conditions are in addition to those of previous air construction permits and the facility Title V Operation Permit. Unless otherwise specified, the emissions unit remains subject to all applicable conditions from previous air construction permits and the Title V Operation Permit. [Rule 62-4.070(3), F.A.C.]

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- Permitted Capacity: The maximum heat input to the GE combustion turbine (CT) at an ambient temperature of 59° F shall not exceed 312 MMBtu/hr while firing fuel oil, biodiesel or blends of biodiesel and No. 2 fuel oil. Heat input may vary depending on ambient conditions and the CT characteristics. The approved manufacturer's curves shall be used to establish heat input rates over a range of temperatures for the purpose of compliance determination. [Rule 62-210.200, F.A.C., AC44-245399/PSD-FL-210]
- Methods of Operation – Fuels: The only fuels to be burned in this unit are new No. 2 fuel oil, biodiesel or blends of biodiesel. The sulfur content of the No. 2 fuel oil shall not exceed 0.050 percent by weight. [Rules 62-4.160(2), 62-210.200 and 62-213.440(1), F.A.C., AC44-245399/PSD-FL-210]
- Hours of Operation/Fuel Consumption: The maximum No. 2 fuel oil consumption allowed to be burned in the CT is 7.1 million gallons per year, which is equivalent to 2,888.5 hours per year at full-load; the CT may operate for more than this if operating at part-load. However, as a result of this test firing of biodiesel in the CT (EU 007), the 7.1 million gallons per year limit of No.2 fuel oil must be reduced using a ratio of 0.9 gallons of biodiesel which equals 1 gallon of No.2 fuel oil. Thus, for every 1000 gallons of biodiesel burned the allowable fuel consumption limit of No. 2 fuel oil must be reduced by 900 gallons. [Rule 62-212.500(56), F.A.C., AC44-245399, PSD-FL-210]

CONSTRUCTION ACTIVITIES

- Biodiesel Test Firing: No physical construction activities will be conducted in association with the biodiesel testing firing project. However, tanker trucks may be used to facilitate the blending of biodiesel with No. 2 fuel oil. [Application]

EMISSION REQUIREMENTS

- Emission Testing: When firing biodiesel or blends of biodiesel in the CT (EU 007) tests shall be conducted to determine emissions of particulate matter (PM/PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO). The emissions tests shall be conducted using the approved methods of the Title V Operation Permit. At least one complete 3-run test at 95 percent or greater of full-load shall be conducted when firing biodiesel fuel. The test must be conducted within seven days of the commencement of firing the biodiesel in the CT. Additionally, one complete 3-run test shall be conducted at 95 percent or greater of full-load when the blend of biodiesel being fired in the CT changes by 20 percent or more, e.g., B20 to B40 or B100 to B80. The emissions of sulfur dioxide shall be determined through the analysis of the biodiesel fuel or certification of the supplier. [Rule 62-4.070(3), F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

EU 007 - CT No. 1

NOTIFICATIONS AND REPORTS

6. Notifications: One week prior to the start of biodiesel firing in the CT, the permittee shall notify the Compliance Authority that the testing firing is about to commence and provide a general schedule of the biodiesel firing, including when emissions testing will occur. [Rule 62-4.210, F.A.C.]
7. Reports: The results of the emissions tests shall be submitted to the Department no later than 45 days after the completion of emissions testing. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C.
[Rule 62-297.310(8), F.A.C.]

SECTION IV. EMISSIONS UNITS SPECIFIC CONDITIONS (FINAL)

EU 008 AND 009 - CT NOS. 2 AND 3

This section of the permit addresses the following emissions unit:

ID No.	Emission Unit Description
008	19.77 MW Simple Cycle Combustion Turbine [CT-2]
009	19.77 MW Simple Cycle Combustion Turbine [CT-3]

ADMINISTRATIVE REQUIREMENTS

Previous Permit Conditions: This permit authorizes the firing of up to 250,000 gallons of biodiesel as an alternative fuel in EU 008 and 009. The biodiesel can be fired as 100 percent biodiesel or as a blend with No. 2 distillate fuel oil. However, no more than a total 250,000 gallons of biodiesel can be fire in these CT or in combination with in any other CT at the Stock Island Power Plant during the biodiesel test firing project. The following conditions are in addition to those of previous air construction permits and the facility Title V Operation Permit. Unless otherwise specified, the these emissions units remain subject to all applicable conditions from previous air construction permits and the Title V Operation Permit. [Rule 62-4.070(3), F.A.C.]

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. **Method of Operation – Fuels:** Only No. 2 fuel oil, biodiesel or blends of biodiesel can be fired in the combustion turbines. The maximum sulfur content of the No. 2 fuel oil shall not exceed 0.05 percent, by weight. [AC-870003-003]
2. **Permitted Capacity.** The maximum heat input rate to each combustion turbine shall not exceed 305 million Btu per hour (MMBtu/hr). [AC-870003-003]
3. **Fuel Consumption.** The maximum No. 2 fuel oil consumption allowed to be burned in either emission unit No.008 or emission unit No. 009 is 8,840,000 gallons per year, which is equivalent to 4,000 hours per year of operation at full load. The combined fuel oil consumption for both units shall be limited to 8,840,000 gallons per year. However, as a result of this test firing of biodiesel in the CT (EU 008 and 009), the 8,840,000 million gallons per year limit of No.2 fuel oil for each CT or in combination must be reduced using a ratio of 0.9 gallons of biodiesel which equals 1 gallon of No.2 fuel oil. Thus, for every 1000 gallons of biodiesel burned the allowable fuel consumption limit of No. 2 fuel oil must be reduced by 900 gallons. [AC-870003-003]

CONSTRUCTION ACTIVITIES

4. **Biodiesel Test Firing:** No physical construction activities will be conducted in association with the biodiesel testing firing project. However, tanker trucks may be used to facilitate the blending of biodiesel with No. 2 fuel oil. [Application]

EMISSION REQUIREMENTS

5. **Emission Testing:** When firing biodiesel or blends of biodiesel in the CT (EU 008 or 009) tests shall be conducted to determine emissions of particulate matter (PM/PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO). The emissions tests shall be conducted using the approved methods of the Title V Operation Permit. At least one complete 3-run test at 95 percent or greater of full-load shall be conducted when firing the biodiesel fuel. The test must be conducted within seven days of the commencement of firing the biodiesel in the CT. Additionally, one complete 3-run test shall be conducted at 95 percent or greater of full-load when the blend of biodiesel being fired in the CT changes by 20 percent or more, e.g., B20 to B40 or B100 to B80. The emissions of sulfur dioxide shall be determined through the analysis of the biodiesel fuel or certification of the supplier. [Rule 62-4.070(3), F.A.C.]

SECTION IV. EMISSIONS UNITS SPECIFIC CONDITIONS (FINAL)

EU 008 AND 009 - CT NOS. 2 AND 3

{Permitting Note: Emissions tests need only be conducted on one of the CT (EU 008 or 009) even if both are used to fire biodiesel due to the identical nature of the CT.}

NOTIFICATIONS AND REPORTS

6. **Notifications:** One week prior to the start of biodiesel firing in the CT, the permittee shall notify the Compliance Authority that the testing firing is about to commence and provide a general schedule of the biodiesel firing, including when emissions testing will occur. [Rule 62-4.210, F.A.C.]
7. **Reports:** The results of the emissions tests shall be submitted to the Department no later than 45 days after the completion of emissions testing. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C.
[Rule 62-297.310(8), F.A.C.]

SECTION V. EMISSIONS UNITS SPECIFIC CONDITIONS (FINAL)

EU 010 – UNREGULATED EMISSIONS UNITS AND ACTIVITIES

This section of the permit addresses the following emissions unit:

ID No.	Emission Unit Description
010	Two No. 2 Fuel Oil Storage Tanks - 500,000 gallons each*; subject only to 40 CFR 60.116b (a) and (b)
	No. 2 Fuel Oil Storage Tank - 1.9 million gallons; no applicable standards
	Two No. 2 Fuel Oil Storage “day” Tanks - 16,000 gallons each
	Four Vehicular Fleet Fuel Tanks - 2,000 gallons each
	Three Diesel Peaking Generators (2 MW): Unit 10 (formerly E.U. 002, 003 and 004)
	No. 2 Fuel Oil Storage Tank - 1,000,000 gallon; not subject to 40 CFR 60, Subpart Kb*

*One of these tanks will be used to store the biodiesel fuel.

ADMINISTRATIVE REQUIREMENTS

Previous Permit Conditions: This permit authorizes the storage of up to 250,000 gallons of biodiesel in either one or the other of the two 500,000 gallon storage tanks included in EU ID No. 010 that currently store No. 2 diesel fuel oil and provide fuel for CT Nos. 1, 2 and 3 during operation. No more than a total 250,000 gallons of biodiesel can be stored in one of these tanks. Only one tank can be used for the storage of the biodiesel. Upon expiration of this construction permit, any biodiesel remaining in the tank selected for storage must be disposed of following appropriate regulations.

SECTION VI. APPENDICES

APPENDIX GC – GENERAL CONDITIONS

- G.1. The terms, conditions, requirements, limitations and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- Have access to and copy and records that must be kept under the conditions of the permit;
 - Inspect the facility, equipment, practices or operations regulated or required under this permit, and,
 - Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- A description of and cause of non-compliance; and
 - The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

SECTION VI. APPENDICES
APPENDIX GC – GENERAL CONDITIONS

- G.9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13. This permit also constitutes:
- (a) Determination of Best Available Control Technology (not applicable to project);
 - (b) Determination of Prevention of Significant Deterioration (not applicable to project); and
 - (c) Compliance with New Source Performance Standards (not applicable to project).
- G.14. The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, February 24, 2009 3:46 PM
To: 'edward.garcia@keysenergy.com'
Cc: 'kkosky@golder.com'; Satyal, Ajaya; 'forney.kathleen@epa.gov'; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)
Subject: Keys Energy Services - Stock Island Power Plant; 0870003-010-AC
Attachments: 0870003-010-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0870003.010.AC.F_pdf.zip

Owner/Company Name: KEYS ENERGY SERVICES
Facility Name: STOCK ISLAND POWER PLANT
Project Number: 0870003-010-AC
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: MONROE
Processor: David Read

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. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us


Note: The attached 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>.

Livingston, Sylvia

From: Garcia, Edward [Edward.Garcia@KeysEnergy.com]
Sent: Tuesday, February 24, 2009 4:26 PM
To: Livingston, Sylvia
Subject: RE: Keys Energy Services - Stock Island Power Plant; 0870003-010-AC

Mrs. Livingston,

I have received the final permit for the biodiesel fuel.

Edward Garcia
Director – Generation
Keys Energy Services
PO Box 6100
Key West, FL 33041-6100
305.295.1134 (w) 305.295.1145 (f)
 consider the environment before printing this email

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, February 24, 2009 3:46 PM
To: Garcia, Edward
Cc: kkosky@golder.com; Satyal, Ajaya; forney.kathleen@epa.gov; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)
Subject: Keys Energy Services - Stock Island Power Plant; 0870003-010-AC

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Livingston, Sylvia

From: Satyal, Ajaya
Sent: Tuesday, February 24, 2009 4:05 PM
To: Livingston, Sylvia
Subject: RE: Keys Energy Services - Stock Island Power Plant; 0870003-010-AC

Thanks Sylvia,

I was able to open the documents.

AJ Satyal

From: Livingston, Sylvia
Sent: Tuesday, February 24, 2009 3:46 PM
To: 'edward.garcia@keysenergy.com'
Cc: 'kkosky@golder.com'; Satyal, Ajaya; 'forney.kathleen@epa.gov'; Gibson, Victoria; Read, David; Linero, Alvaro; Walker, Elizabeth (AIR)
Subject: Keys Energy Services - Stock Island Power Plant; 0870003-010-AC

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Owner/Company Name: KEYS ENERGY SERVICES
Facility Name: STOCK ISLAND POWER PLANT
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