



FLORIDA KEYS ELECTRIC COOPERATIVE ASSOCIATION, INC. - FKEC

91605 OVERSEAS HIGHWAY P.O. BOX 700377, TAVERNIER, FL 33070-0377 PHONE (305) 852-2431 FAX: (305) 852-4794

Mr. Al A. Linero
Dept. of Environmental Protection
Bureau of Air Resources
Mail Station 5505
2600 Blairstone Rd.
Tallahassee, FL 32399-2400

RECEIVED

DEC 02 2004

BUREAU OF AIR REGULATION

24 November 2004

Dear Mr. Linero:

Florida Keys Electric Cooperative Association, Inc. (FKEC) once again needs to install emergency diesel generators in the Ocean Reef community of North Key Largo in anticipation of possible shortfalls of power supply in the coming winter's peak season. Since FKEC is still stymied in our attempts to install the North Key Largo substation, we must continue to use temporary measures to ensure a reliable power supply to the North Key Largo community.

FKEC will be temporarily installing two 2.0 mw Cummins trailer mounted diesel generator sets on the same Ocean Reef location used last year for this purpose. The generators will be fueled by low sulfur (<0.05%) No. 2 diesel. The requested period of use is for four months. Enclosed for your review are vendor supplied fact sheets on the generator sets. FKEC does not anticipate running these units for any extended periods, nor do we want to be in the position of having to run them. However, FKEC must install the units in case heavy demand, due to cold weather or some unexpected power interruption, necessitates immediate additional power on a short term basis.

The units have the advantage of having internal fuel tanks and they are more fuel efficient than previous models. Since these two generators are installed only for emergency generation and since FKEC does not anticipate exceeding the limits specified in FAC 62.210.300(3), FKEC claims a categorical exemption under FAC 62.210.300(3)(a)20 based on fuel consumption and expected limited operation.

A. Linero, p. 2.

Since the season of heavy electrical use is just beginning here in the Keys, FKEC needs to have the generators in place as soon as possible. Mr. Mike Anderson, FKEC Supervisor of System Operations is available to supply any further technical information if needed. Mike or I can be reached at the letterhead number, or I may be reached directly through my cell phone, number 305/522-1737. Please call if you require further information. Thank you very much for your assistance.

Very truly yours,



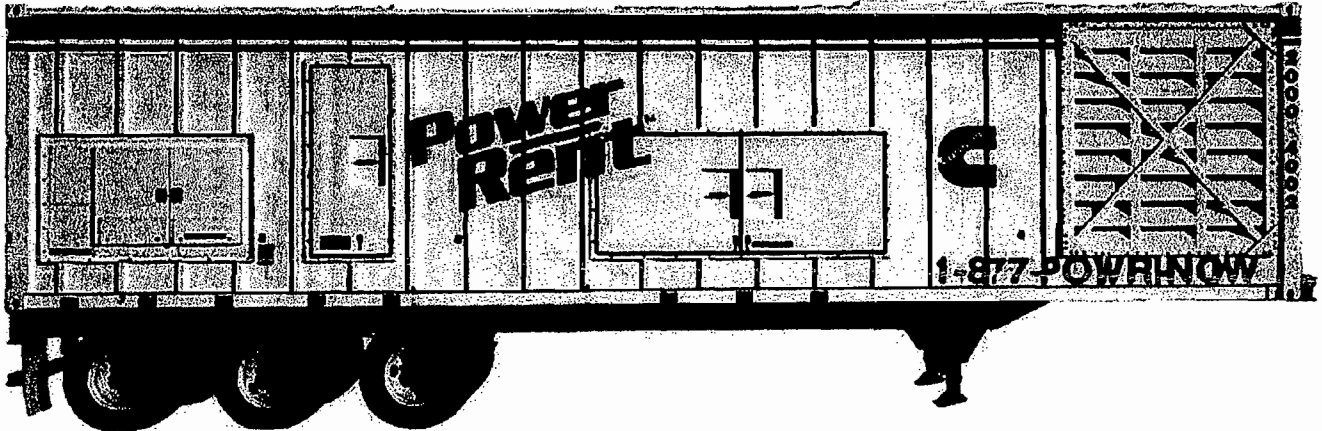
Deborah A. Shaw, Ph.D.
Director of Environmental Affairs

pc:
Tim Planer, CEO and General Manager, FKEC
Mike Anderson, Supv. System Operations, FKEC

Enc:
Spec sheets Cummins Power Generation Sets
FKEC unit photos dated 11/19/04



2000kW Rental Package



Features

Cummins® Power Generation Sets

- Cummins engines, Newage Alternators and PowerCommand Controls - Designed, built, certified prototype tested and warranted by the only company that controls the process from start to finish.
- Supported exclusively worldwide by your Cummins Distributors.
- Utilize proven standard generator set designs.
- Includes jacket water heaters for more reliable operation in emergency standby applications.

Cummins Diesel Engines

- Lightweight, compact and excellent fuel economy.
- Operate at up to 45°C (113°F) with no effect on output.
- Equipped with Heavy Duty Air Cleaners and Bypass-type Oil Filters. Includes jacket water heaters for more reliable operation in emergency standby applications.

Newage® Alternators

- Designed and built by Cummins Power Generation.
- Oversized alternators for improved motor starting and low temperature rise in prime and continuous applications.
- Permanent Magnet excitation for improved performance in cyclic and non-linear load applications.

PowerCommand® Paralleling Controls

- The most advanced, reliable and capable generator set control system available in the market today.
- Integrated generator set governing, voltage regulation, protection and paralleling functionality in one easy-to-operate customer interface.
- Multiple unit and grid paralleling ready.
- Fully automatic paralleling capability.
- Remote monitoring and networking operation capable.
- Integrated Ground Fault Indication.
- Optional freestanding, electronically operated closed-transition transfer switches are available.

Cummins Cooling System

- Optimized for maximum efficiency and minimum noise.
- Propylene glycol coolant for greater environmental protection.

Custom Switchgear

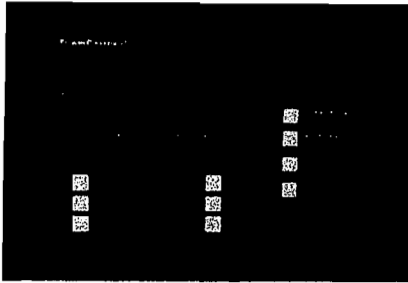
- Designed and built to meet severe customer requirements.
- Equipped for total remote automatic monitoring and control for stand alone, paralleling or emergency standby applications.
- Easy connection to existing installations using lugs or installed Cam-Lok® connectors.
- 2-unit parallel capability using installed switchgear, allowing 100% redundancy or increased capacity. (Optional)
- 5-cycle closure, motor-operated circuit breaker for automatic paralleling.
- Convenient Shore Power connection provides power to interior lighting, jacket water heaters, battery charger and alternator anti-condensation space heaters allowing quick starts even in arduous applications.
- Easy connection to PowerCommand PLTR switchgear providing fully featured microprocessor based power transfer capability.

ISO Container Enclosure

- Purpose built 40-foot High Cube ISO container.
- Easy-to-transport.
- Optimal unit protection with minimum size.
- Optimized fuel capacity with UL142 listed/NFPA30 compliant fuel tank.
- Fluid containment design for greater environmental protection.
- Sound attenuated to minimize impact on the local environment.
- Vertical cooling air and engine exhaust path to minimize sound level adjacent to the container.
- Equipped with 120VAC and 24VDC lighting.

Running Gear

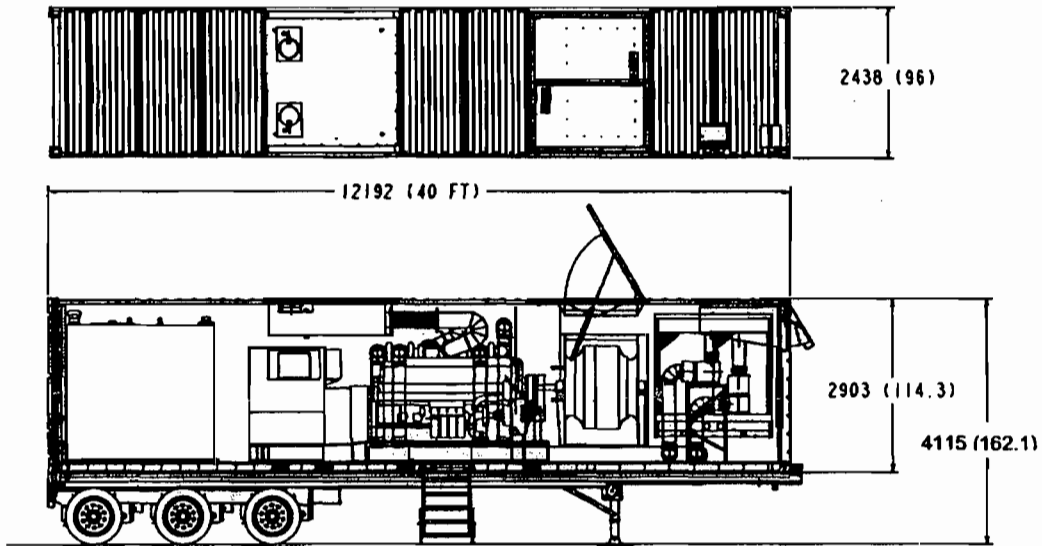
- 40-foot triple axle chassis.
- Air Ride suspension equipped for the softest ride in the industry.
- Anti-Lock Brake System.
- 200,000 pound (static load) landing gear.



PowerCommand® Digital Generator Set Control	
Operator Panel Features	
<ul style="list-style-type: none"> • Emergency stop switch • Indicating lamps for remote start, Not In Auto, common shutdown, and common warning • Fault reset switch • Panel lamp/lamp test switch • Exercise switch and indicating lamp • Manual run/stop switch • Off/Manual/Auto mode select switch • Graphical display panel with pushbutton switches capable of displaying up to 9 lines of data approximately 26 characters wide, as well as graphical characters 	<ul style="list-style-type: none"> • Analog AC metering panel for simultaneous monitoring of 3-phase AC voltage and current, kW, power factor, and frequency. Voltage, current and kW are scaled in % of nominal values. All values are color-coded to indicate normal, warning and abnormal operating conditions • Single membrane front panel with construction providing NEMA 3R/IP53 protection.
Standard Features	Optional Features
<ul style="list-style-type: none"> • Isochronous governing • 3-phase sensing voltage regulation with single and three phase fault current regulation • AC output protection including over/under voltage, over/under frequency, overcurrent, short circuit, and overload (kW) • Engine control and monitoring system with displays for oil pressure, oil temperature, engine coolant temperature, engine speed, battery voltage and other values • Generator set protection system including AC output protection alarms, engine pressure, temperature warning, shutdown functions, low coolant temperature, low coolant level, low fuel level, failure to crank, failure to start and overspeed • Operator adjustments for time delay, start/stop, engine speed, and overspeed • Technician setup menu • Status and data display functions including engine operating hours, kW hour productions, AC metering functions and fault history 	<ul style="list-style-type: none"> • Alternator temperature alarms • Automatic mains failure control • Control anti-condensation heater • Digital paralleling controls • Echelon LonWorks interface • Generator running relay contacts • Key-type mode control switch

Ratings Definitions

Standby:	Prime (Unlimited Running Time):	Base Load (Continuous):
<p>Applicable for supplying emergency power for the duration of normal power interruption. No sustained overload capability is available for this rating. Nominally rated. (Equivalent to Fuel Stop Power in accordance with ISO3046, AS2789, DIN6271, and BS5514.)</p>	<p>Applicable for supplying power in lieu of commercially purchased power. Prime power is the maximum power available at a variable load for an unlimited number of hours. A 10% overload capability is available for limited time. Nominally rated. (Equivalent to Prime Power in accordance with ISO8528 and Overload Power in accordance with ISO3046, AS2789, DIN6271, and BS5514.)</p>	<p>Applicable for supplying power continuously to a load for this rating. Nominally rated. Consult authorized distributor for rating. (Equivalent to Continuous Power in accordance with ISO8528, ISO3046, AS2789, DIN6271, and BS5514.)</p>



This outline drawing is provided for general reference only and is not intended for design or installation. See outline drawing 500-3398 for more information (available from your Distributor/Dealer).

	Length		Width		Height		Weight (w/o Fuel)		Weight (with Fuel)		Fuel Capacity	
	in	mm	in	mm	in	mm	lbs	Kg	lbs	kg	US Gal	liters
DQKC	480	12192	96	2438	162	4115	62500	28350	76913	34881	2030	7684

Model	kW Rating		Cummins Engine Model	Sound Level dBa @7m	Generator Specification Sheet #	Hours of Operation (75% Load)	
	Standby	Prime				Standby	Prime
DQKC	2000 kW	1800 kW	QSK60-G6 (2P/2L)	76	S-1383	20	22

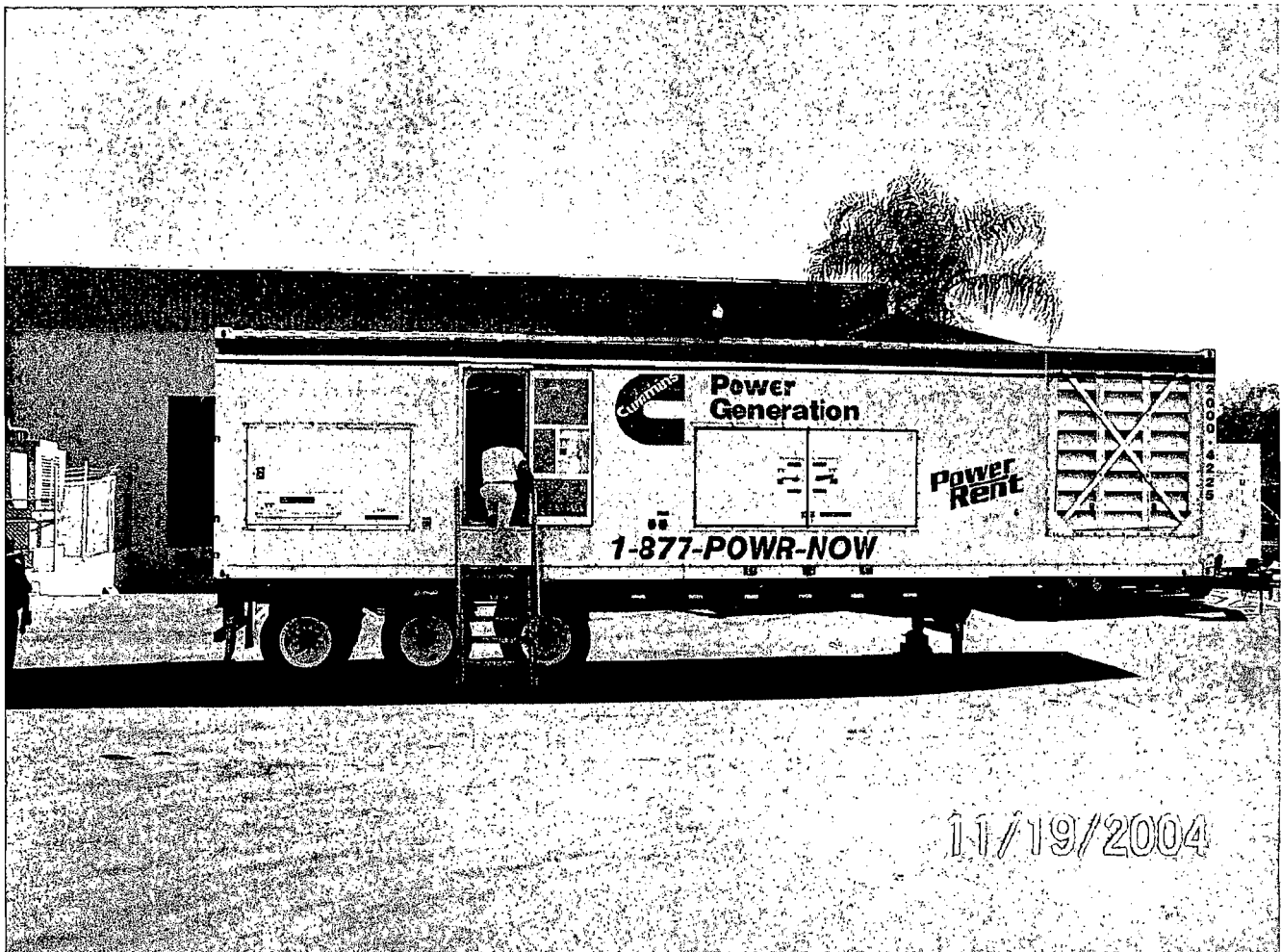


**Power
Rent**

Cummins Power Generation
 1400 73rd Avenue N.E.
 Minneapolis, MN 55432
 763-574-5000
 1-877-POWR-NOW (877-769-7669)
 Fax: 763-574-8087
 www.cumminspowerrent.com

See your distributor for more information.

Backfeed to a utility system can cause electrocution and/or property damage. Do not connect to any building's electrical system except through an approved device or after building main switch is opened.



Subsection B. This section addresses the following emissions units.

<u>E.U.</u>	<u>Brief Description</u>
<u>ID No.</u>	
008	3.58 MW Diesel Electric Generator
009	3.58 MW Diesel Electric Generator

{Permitting notes: Emission Unit 008 is regulated for fuel sulfur content, visible emissions, and nitrogen oxides under: Rule 62-212.400(5), F.A.C., Prevention of Significant Deterioration (PSD), Construction Permits 0870004-002-AC/PSD-FL-237, 0870004-003-AC/PSD-FL-237A and 0870004-004-AC/PSD-FL-285. Nitrogen oxides and visible emissions are subject to Best Available Control Technology (BACT) Determination dated September 11, 1997 and BACT Determination (revised) April 28, 1998 and BACT Determination dated November 16, 2000. Emission Unit 009 is regulated for fuel sulfur content, visible emissions, PM¹⁰ emissions and nitrogen oxides under Rule 62-212.400 (5), F.A.C., Prevention of Significant Deterioration (PSD), Construction Permit 0870004-004-AC/PSD-FL-285. Nitrogen oxides, visible emissions, and PM¹⁰ emissions are subject to Best Available Control Technology (BACT) dated November 16, 2000.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum heat input to Emission Unit 008 or to Emissions Unit 009 shall not exceed 30.2 MMBtu/hr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C. and Construction Permits 0870004-002-AC/PSD-FL-237, dated September 12, 1997 and 0870004-004-AC/PSD-FL-285, dated November 16, 2000]

B.2. Methods of Operation.

- a.) Only No. 2 low sulfur fuel oil shall be fired in the emissions units. The maximum sulfur content of the No.2 fuel oil shall not exceed 0.50 percent, by weight.
- b.) The maximum No.2 fuel oil consumption allowed to be burned in either Emissions Unit 008 or in Emissions Unit 009 is 2,015,000 gallons per year, which is equivalent to 8760 hours per year of operation at full load for either emissions unit.

[Rules 62-210.200(PTE) and 62-213.410, F.A.C. and Construction Permits 0870004-002-AC/PSD-FL-237, dated September 12, 1997 and 0870004-004-AC/PSD-FL-285, dated November 16, 2000]

B.3. Hours of Operation. These emissions units are allowed to operate continuously 8760 hours/year. [Rule 62-210.200(PTE), F.A.C. and Construction Permits 0870004-002-AC/PSD-FL-237, dated September 12, 1997 and 0870004-004-AC/PSD-FL-285, dated November 16, 2000]

Emission Limitations and Standards

{Permitting Note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions units.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
001	2.0 MW Diesel Electric Generator
002	2.0 MW Diesel Electric Generator
003	3.0 MW Diesel Electric Generator
004	3.0 MW Diesel Electric Generator
005	3.0 MW Diesel Electric Generator
006	2.5 MW Diesel Electric Generator
007	2.5 MW Diesel Electric Generator

{Permitting notes: Emissions Units 001-007 are regulated for fuel sulfur content, visible emissions, combined maximum heat input, and restricted operation (hours/fuel consumption) under Construction Permit 0870004-002-AC/PSD-FL-237, dated September 12, 1997.

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The combined maximum heat input to Emissions Units 001-007 shall not exceed 187 MMBtu/hr while firing No.2 fuel oil.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C. and Construction Permit 0870004-002-AC/PSD-FL-237, dated September 12, 1997]

A.2. Methods of Operation. Only No. 2 fuel oil can be fired in the emissions units. The maximum sulfur content of the No.2 fuel oil shall not exceed 0.50 percent, by weight.
[Rules 62-210.200 (PTE) and 62-213.410, F.A.C. and Construction Permit 0870004-002-AC/PSD-FL-237, dated September 12, 1997]

A.3. Hours of Operation. The hours of operation for these emissions units shall be limited to either 4380 hours per year per unit or to a total fuel oil consumption of 6,200,000 gallons per year for all seven units, whichever limit is more restrictive.
[Rule 62-210.200(PTE), F.A.C. and Construction Permit 0870004-002-AC/PSD-FL-237, dated September 12, 1997]

Emission Limitations and Standards

{Permitting Note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.4. Visible emissions shall not exceed 20% opacity.
[Rule 62-296.310, F.A.C. and Construction Permit 0870004-002-AC/PSD-FL-237, dated September 12, 1997]

Effective 11-01-04

17. Laundry dryers, extractors, or tumblers for fabrics cleaned with only water solutions of bleach or detergents.
18. Petroleum dry cleaning facilities with a solvent consumption of less than 3,250 gallons per year.
19. Portable air curtain incinerators except any air curtain incinerator intended to be continuously operated at one site for more than six months or at any Department-permitted landfill for any length of time; provided:
 - a. Only land clearing debris or clean dry wood is burned;
 - b. Pit width, length, and side walls are properly maintained so that combustion of the waste within the pit is maintained at an adequate temperature and with sufficient air recirculation to provide enough residence time and mixing for complete combustion and control of emissions. Pit width shall not exceed twelve (12) feet, and vertical side walls shall be maintained;
 - c. No waste is positioned to be burned above the level of the air curtain in the pit;
 - d. Visible emissions do not exceed 40 percent opacity except for up to 30 minutes during periods of startup and shutdown;
 - e. The air curtain incinerator is located at least 300 feet away from any occupied building if it has refractory-lined walls and forced underdraft air or otherwise at least 1,000 feet away from any occupied building; and
 - f. The burning is ignited after 9:00 a.m. and extinguished at least one hour before sunset, except that, in the case of an air curtain incinerator with refractory-lined walls and forced underdraft air which is located at least 1,000 feet away from any off-site occupied building, the burning may commence at sunrise, and the air curtain incinerator may be charged until sunset provided it does not create a nuisance.
20. One or more emergency generators located within a single facility provided:
 - a. None of the emergency generators is subject to the Federal Acid Rain Program; and
 - b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
21. One or more heating units, general purpose internal combustion engines, or other combustion devices, all of which are located within a single facility, are not listed elsewhere in paragraph 62-210.300(3)(a), F.A.C., and are not pollution control devices, provided:
 - a. None of the heating units, general purpose internal combustion engines, or other combustion devices that would be exempted is subject to the Federal Acid Rain Program;
 - b. Total fuel consumption by all such heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used; and
 - c. Fuel for the heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to natural gas, diesel fuel, gasoline and propane.
22. Fire and safety equipment.
23. Surface coating operations within a single facility if the total quantity of coatings containing greater than 5.0 percent VOCs, by volume, used is 6.0 gallons per day or less, averaged monthly, provided:
 - a. Such operations are not subject to a volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.; and
 - b. The amount of coatings used shall include any solvents and thinners used in the process including those used for cleanup.
24. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
25. Phosphogypsum cooling ponds and inactive phosphogypsum stacks which have demonstrated compliance with the requirements of 40 C.F.R. Part 61, Subpart R, hereby adopted and incorporated by reference.
26. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.
27. Volume reduction processes as defined in Rule 62-296.417, F.A.C., wherein the owner or operator manages only spent mercury-containing lamps removed from the facility where the volume reduction process is located.
28. Mercury recovery processes as defined in Rule 62-296.417, F.A.C., wherein the owner or operator manages only mercury-containing devices temporarily or permanently removed from service from the owner or operator's own facilities or installations.
29. Bulk gasoline plants, provided:
 - a. Such operations are not conducted at a facility that is subject to the permitting requirements of Chapter 62-213, F.A.C., and the emissions from such operations would not contribute to total emissions that would make the facility subject to those requirements;
 - b. The facility receives and distributes only petroleum-based lubricants, gasoline, diesel fuel, mineral spirits and kerosene;
 - c. The total storage capacity for gasoline at the facility does not exceed 100,000 gallons;
 - d. The facility does not exceed a throughput rate (receive and distribute) of 1.3 million gallons of gasoline in any consecutive twelve-month period;
 - e. The facility is not subject to any Standard of Performance for New Stationary Sources (NSPS) requirement adopted by reference in Rule 62-204.800, F.A.C.; and
 - f. The facility is not subject to any volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.

Friday, Barbara

From: Arif, Syed
Sent: Monday, August 23, 2004 8:44 AM
To: Friday, Barbara
Cc: Adams, Patty
Subject: FW: Stock Island Title V Permit Renewal

Barbara – Keys Energy Services application (0870003-006-AV) was returned to the applicant for resubmittal. The time clock needs to be stopped for this application. Thanks.

Syed Arif, P.E
Permit Engineer
Division of Air Resources Management
Department of Environmental Protection
(850) 921-9528 or SC 291-9528

-----Original Message-----

From: Arif, Syed
Sent: Monday, August 23, 2004 9:37 AM
To: 'Edward.Garcia@keysenergy.com'
Cc: 'IClark@rwbeck.com'
Subject: Stock Island Title V Permit Renewal

Ed and Ivan –

The Title V Permit Renewal for Stock Island will be returned electronically for resubmittal. The application is considered incomplete for not uploading supplemental attachments of the application. Additionally, Acid Rain form (DEP Form No. 62-210.900(1)(a)) was not included with the application. The application will be reviewed after we receive these documents. If you have any questions, feel free to call me.

Syed Arif, P.E
Permit Engineer
Division of Air Resources Management
Department of Environmental Protection
(850) 921-9528 or SC 291-9528