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DIVISION OF AIR  
RESOURCE MANAGEMENT

Tom C.  
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UTILITY BOARD OF THE CITY OF KEY WEST

June 26, 2012

Jeff Koerner, P.E.  
New Source Review Program Administrator  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

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DIVISION OF AIR  
RESOURCE MANAGEMENT

Re: Facility ID No. 0870003, Emissions Units 005 & 006

Dear Mr. Koerner:

Project No: 0870003-015-AC

This letter is to request an exemption from the requirement to obtain an air construction permit for the installation of control equipment to reduce emissions from the medium speed diesels (EUs 005 and 006) at the Keys Energy Services Stock Island facility to comply with the requirements of 40 CFR 63 Subpart ZZZZ. In my letter to Jonathan Holtom dated July 27, 2010, I notified the Department that these emissions units were subject to the requirements of ZZZZ.

These two engines are existing non-emergency, non-black start CI stationary RICE (constructed 1991) greater than 500 horsepower (8.8 MW) at an area source of HAPs and are subject to the requirements of ZZZZ. Specifically, the requirements listed in Table 2d of ZZZZ require reduction of CO emissions by 70 percent or an emission limit of 23 ppmvd at 15% O<sub>2</sub>. We intend to install catalytic oxidizers to meet this requirement. The rule also requires reduction of metallic HAPs emissions. If the units do not already have a closed crankcase ventilation system, then either a closed crankcase ventilation system must be installed or an open crankcase filtration emission control system must be installed. The existing MSDs have open crankcase ventilation systems with filtration already in place. We expect to begin the installation of the catalytic oxidizers in late fall of this year to meet the compliance date of May 3, 2013.

These EUs are permitted under 0870003-011-AV which expires December 31, 2014. It is our intent to submit an application to revise this permit by the end of August to accommodate the changes to the EUs and to include the applicable requirements of ZZZZ.

Please contact me at (305) 295-1140 or Amy Deese at 321-239-1004, if you have any questions or if more information is needed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Edward Garcia".

Edward Garcia  
Director of Generation  
[Edward.Garcia@Keysenergy.com](mailto:Edward.Garcia@Keysenergy.com)

c:

L. Tejada, General Manager & CEO  
J. Wetzler, Asst. Gen Manager & CFO  
J. Holton, FDEP Tallahassee  
S. Culliver, FDEP South District  
B. Nevins, FDEP Marathon Branch Office  
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