

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit


Ms. Deborah Shaw
Florida Keys Electric Cooperative Association, Inc.
91605 Overseas Highway
P.O. Box 700377
Tavernier, Florida 33070-0377

DEP File No. 0870004-002-AC
PSD-FL-237

Enclosed is the FINAL Permit Number PSD-FL-237 for the construction of a 3.58 megawatt diesel generator (Unit 8) at the Florida Keys Electric Cooperative, Marathon Generating Plant, Monroe County. This permit is issued pursuant to Chapter 403, Florida Statutes and in accordance with Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration(PSD).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.


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

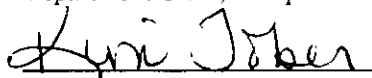
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9-12-97 to the person(s) listed:

Ms. Deborah Shaw, FKEC *
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. David Knowles, DEP

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 9-12-97
(Clerk) (Date)

FINAL DETERMINATION

Florida Keys Electric Cooperative Association, Incorporated

Permit No. 0870004-002-AC, PSD-FL-237

Marathon Generation Plant

An Intent to Issue an air construction permit for Unit 8 at Florida Keys Electric Cooperative Association's, Marathon Generation Plant's, Monroe County, was distributed on August 11, 1997. The Notice of Intent was published in the Miami Herald on August 13, 1997. Copies of the draft construction permit were available for public inspection at the Department offices in Ft. Myers and Tallahassee.

No comments were submitted by the National Park Service, the U.S. Environmental Protection Agency or the public. No comments were received from the applicant other than inquiries regarding the earliest possible issue date of the final permit.

The final action of the Department is to issue the permit as proposed.

P 265 659 454

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to	
Deb. Shaw	
Street & Number	
FIA Keys Electric	
Post Office, State, & ZIP Code	
Tavernier, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
9-12-97	
0670004-002-AC	
PSD-FI-237	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:		4a. Article Number
Ms. Deborah Shaw		P 265 659 454
FIA Keys Electric Coop		4b. Service Type
91605 Overseas Hwy		<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified
P.O. Box 700377		<input type="checkbox"/> Express Mail <input type="checkbox"/> Insured
Tavernier, FL 33070-0377		<input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
5. Received By: (Print Name)		7. Date of Delivery
Dayna South FKA		
6. Signature: (Addressee or Agent)		8. Addressee's Address (Only if requested and fee is paid)
x Dayna South		

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Keys Electric Cooperative Association, Inc.
91605 Overseas Highway
Tavernier, Florida 33070

Authorized Representative:

Charles A. Russell
Chief Executive Officer General Manager

FID No.	0870004
PSD No.	PSD-FL-237
SIC No.	4911
Project:	Unit 8
Permit No.	0870004-002-AC
Expires:	January 31, 1999

PROJECT AND LOCATION:

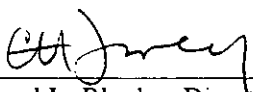
Permit for the construction of a 3.58 megawatt diesel electric generator at the Marathon Generation Power Plant, 3421 Overseas Highway, Marathon, Monroe County. UTM coordinates are Zone 17; 490.7 km E; 2732.7 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility 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 of Environmental Protection (Department).

Attached appendices are made a part of this permit:

Appendix BD	BACT Determination
Appendix GC	Construction Permit General Conditions
Appendix CSC	Emission Unit(s) Common Specific Conditions


for Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT 0870004-002-AC AND PSD-FL-237

SECTION I. FACILITY INFORMATION

SUBSECTION A. FACILITY DESCRIPTION

The Florida Keys Electric Cooperative Association (FKEC) Marathon Generating Plant presently consists of two nominal 2.0 Megawatt (MW) diesel generators designated as Units 1 and 2, three nominal 3.0 MW diesel generators (Units 3, 4 and 5), and two 2.5 MW diesel generators (Units 6 & 7). This permit is to construct a 3.58 MW diesel generator designated as Unit 8 and to limit the potential-to-emit of the other units.

SUBSECTION B. REGULATORY CLASSIFICATION

The Marathon Generation Power Plant is classified as a Major Source of Air Pollution or Title V Source because it emits or has the potential to emit at least 100 tons per year of nitrogen oxides (NO_x) and carbon monoxide (CO). It is also a Major Facility with respect to preconstruction review because it emits or has the potential to emit at least 250 tons per year of NO_x and CO.

SUBSECTION C. PERMIT SCHEDULE:

- 01-27-97: Date of Receipt of Application
- 07-10-97: Application deemed complete
- 08-11-97: Intent issued
- 08-13-97: Notice published in the Miami Herald

SUBSECTION D. RELEVANT DOCUMENTS:

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received 1-27-97
- Department's letter dated 2-13-97
- Company letters dated 4-7-97, 5-19-97, 5-27-97, 6-19-97, and 7-10-97
- Technical Evaluation and Preliminary Determination dated 8-11-97
- Best Available Control Technology determination (issued concurrently with permit)

AIR CONSTRUCTION PERMIT 0870004-002-AC AND PSD-FL-237

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION A. ADMINISTRATIVE

- A.1 Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department of Environmental Protection, South District Office located at 2295 Victoria Avenue, Suite 364, Ft. Myers, Florida 33901, and phone number (941) 332-6975. All applications for permits to construct or modify an emission unit(s) *subject to the Prevention of Significant Deterioration (PSD)* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blainstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-1344.
- A.2 General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- A.3 Emission Unit(s) Common Specific Conditions: The owner and operator is subject to and shall operate under the attached Emission Unit(s) Common Specific Conditions listed in *Appendix CSC* of this permit. The Emission Unit(s) Common Specific Conditions are binding and enforceable pursuant to Chapters 62-204 through 62-297 of the Florida Administrative Code.
- A.4 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- A.5 Forms and Application Procedures: 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. [Rule 62-210.900, F.A.C.]
- A.6 Expiration: This air construction permit shall expire on January 31, 1999. [Rule 62-210.300(1), F.A.C.]. The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the permitting authority office of any delays in completion of the project which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C.]
- A.7 Applicable Regulations: The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]

AIR CONSTRUCTION PERMIT 0870004-002-AC AND PSD-FL-237

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. LISTING OF EMISSIONS UNITS

This permit addresses the following emission units.

EMISSIONS UNIT NO.	SYSTEM	EMISSIONS UNITS DESCRIPTION
001#	Power	2.0 MW Diesel Electric Generator
002#	Power	2.0 MW Diesel Electric Generator
003#	Power	3.0 MW Diesel Electric Generator
004#	Power	3.0 MW Diesel Electric Generator
005#	Power	3.0 MW Diesel Electric Generator
006#	Power	2.5 MW Diesel Electric Generator
007#	Power	2.5 MW Diesel Electric Generator
008*	Power	3.58 MW Diesel Electric Generator

Existing Emission units

* New Emission unit

SUBSECTION B. SPECIFIC CONDITIONS (UNIT 008):

The following Specific Conditions apply to the following emission unit:

EMISSION UNIT NO.	SYSTEM	EMISSION UNIT DESCRIPTION
008	Power	3.58 MW Diesel Electric Generator

EMISSION LIMITATIONS

- B.1 The maximum allowable emission rates for NO_x for Unit No. 008 shall not exceed 62 pounds per hour (lb/hr) and 271 tons per year (TPY) pursuant to the Best Available Control Technology (BACT) Determination. [Rule 62-212.410, F.A.C.]
- B.2 Visible emissions shall not exceed 20% opacity. [Rule 62-296.310, F.A.C.]
- B.3 In order to minimize excess emissions during startup/shutdown/malfunction this emission unit shall adhere to best operational practices. [Rule 62-210.700, F.A.C.]

OPERATIONAL LIMITATIONS

- B.4 The emission unit is allowed to operate continuously (8760 hours/year) [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit].
- B.5 Only No. 2 fuel oil can be fired in the diesel generator. The maximum sulfur content of the No. 2 fuel oil shall not exceed 0.05 percent, by weight. [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit].

AIR CONSTRUCTION PERMIT 0870004-002-AC AND PSD-FL-237

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- B.6 The maximum heat input rate to Unit No. 008 shall not exceed 30.2 million Btu per hour (MMBtu/hr) [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit].
- B.7 The maximum No. 2 fuel oil consumption allowed to be burned in Unit No. 008 is 2,015,000 gallons per year, which is equivalent to 8760 hours per year of operation at full load. [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit]

TEST METHODS AND PROCEDURES

- B.8 Compliance with the allowable emission limiting standards for NO_x in B.1 shall be determined by using EPA Reference Method 7E (or equivalent) as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800, F.A.C. An annual compliance test shall be performed on the unit if operated for more than 400 hours in the preceding 12-month period. [Rule 62-297.310, F.A.C.]
- B.9 An initial compliance test shall be conducted for CO emissions using EPA Reference Method 10 as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800, F.A.C. If the test indicates emissions to be less than 23 lb/hr, then no further testing will be required. If CO emissions exceed 23 lb/hr, the permittee will have to submit a BACT determination for CO. [Rules 62-297.310, F.A.C.]
- B.10 The fuel shall be monitored initially and annually for the sulfur content using ASTM D4294 Method (or equivalent). [Rule 62-297.440, F.A.C.]
- B.11 The permittee shall maintain daily records of fuel oil consumption for the emission unit. [Rule 62-210.200, F.A.C.]
- B.12 Compliance with the visible emission standard shall be demonstrated with EPA Reference Method 9 as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-297.401, F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

- B.13 All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]
- B.14 Two copies of the results of the emission tests for the pollutant listed in Condition B.1 for Unit No. 8 shall be submitted within forty-five days of the last sampling run to the South District office in Ft. Myers. All reports shall be in a format consistent with and shall include the information in accordance with Rule 62-297.310 (8), F.A.C. [Rule 62-297.310(8), F.A.C.]

AIR CONSTRUCTION PERMIT 0870004-002-AC AND PSD-FL-237

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION C. SPECIFIC CONDITIONS (UNIT 001-007)

The following Specific Conditions apply to the following emission units:

EMISSIONS UNIT NO.	SYSTEM	EMISSIONS UNITS DESCRIPTION
001	Power	2.0 MW Diesel Electric Generator
002	Power	2.0 MW Diesel Electric Generator
003	Power	3.0 MW Diesel Electric Generator
004	Power	3.0 MW Diesel Electric Generator
005	Power	3.0 MW Diesel Electric Generator
006	Power	2.5 MW Diesel Electric Generator
007	Power	2.5 MW Diesel Electric Generator

EMISSION LIMITATIONS

- C.1 Visible emissions shall not exceed 20% opacity. [Rule 62-296.310, F.A.C.]
- C.2 In order to minimize excess emissions during startup/shutdown/malfunction this emission unit shall adhere to best operational practices. [Rule 62-210.700, F.A.C.]

OPERATIONAL LIMITATIONS

- C.3 The combined maximum heat input to Units No. 001-007 shall not exceed 187 MMBtu/hr while firing No. 2 fuel oil. [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit]
- C.4 The existing Units No. 001-007 operations 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, F.A.C., Definitions: Potential-to-Emit]
- C.5 No. 2 fuel oil can be fired in the diesel generators 001-007. The maximum sulfur content of the No. 2 fuel oil shall not exceed 0.50 percent, by weight. [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit]

TEST METHODS AND COMPLIANCE PROCEDURES

- C.6 The No. 2 fuel oil shall be monitored initially and annually for the sulfur content using ASTM D4294 Method (or equivalent). [Rule 62-297.440, F.A.C.]
- C.7 The permittee shall maintain daily records of fuel oil consumption for the emission units. [Rule 62-210.200, F.A.C., Definitions: Potential-to-Emit.]
- C.8 Compliance with the visible emission standard shall be demonstrated with EPA Reference Method 9 as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in 62-204.800, F.A.C. [Rule 62-297.310, F.A.C.]

APPENDIX CSC

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

SUBSECTION 1.0 CONSTRUCTION REQUIREMENTS

- 1.1 Applicable Regulations: Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) 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 Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Part 60, adopted by reference in the Florida Administrative Code regulation [Rule 62-204.800, 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 requirements or regulations. [Rule 62-210.300, F.A.C.]

SUBSECTION 2.0 EMISSION LIMITING STANDARDS

- 2.1 General Particulate Emission Limiting Standards. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). [Rule 62-296-320(4)(b)1, F.A.C.]
- 2.2 Unconfined Emissions of Particulate Matter [Rule 62-296.320(4)(c), F.A.C.]
- (a) The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.
 - (b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
 - (c) Reasonable precautions include the following:
 - Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

APPENDIX CSC

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

***NOTE:** Facilities that cause frequent, valid complaints may be required by the Permitting Authority to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.*

2.3 General Pollutant Emission Limiting Standards: [Rule 62-296.320, F.A.C.]

- (a) The owner or operator shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

***NOTE:** An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [F.A.C. 62-210.200(198)]*

SUBSECTION 3.0 OPERATION AND MAINTENANCE

- 3.1 Changes/Modifications: The owner or operator shall submit to the Permitting Authority(s), for review any changes in, or modifications to: the method of operation; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain, an air construction permit prior to making the desired change. *Routine maintenance of equipment will not constitute a modification of this permit.* [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]
- 3.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the Permitting Authority as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]

APPENDIX CSC
EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

- 3.3 Circumvention: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
- 3.4 Excess Emissions Requirements [Rule 62-210.700, F.A.C.]
- (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Permitting Authority office for longer duration. [Rule 62-210.700(1), F.A.C.]
 - (b) Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
 - (c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify Permitting Authority within one (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. [Rule 62-210.700(6), F.A.C.]
- 3.5 Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]

SUBSECTION 4.0 MONITORING OF OPERATIONS

- 4.1 Determination of Process Variables
- (a) The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - (b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

APPENDIX CSC
EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

SUBSECTION 5.0 TEST REQUIREMENTS

- 5.1 **Test Performance** Within 60 days after achieving the maximum production rate at which these emission units will be operated, but not later than 180 days after initial startup and annually thereafter, the owner or operator of this facility shall conduct performance test(s) pursuant to 40 CFR 60.8, Subpart A, General Provisions and 40 CFR 60, Appendix A. No other test method shall be used unless approval from the Department has been received in writing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emission unit(s) operating at permitted capacity pursuant to Rule 62-297.310(2), F.A.C. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C.]
- 5.2 **Test Procedures** shall meet all applicable requirements of the Florida Administrative Code Chapter 62-297. [Rule 62-297.310, F.A.C.]
- 5.3 **Test Notification:** The owner or operator shall notify the Permitting Authority in writing at least *(30) days* (initial) and *15 days* (annual) prior to each scheduled compliance test to allow witnessing. The notification shall include the compliance test date, place of such test, the expected test time, the facility contact person for the test, and the person or company conducting the test. The (30) or (15) day notification requirement may be waived at the discretion of the Department. Likewise, if circumstances prevent testing during the test window specified for the emission unit, the owner or operator may request an alternate test date before the expiration of this window. [Rule 62-297.310 and 40 CFR 60.8, F.A.C.]
- 5.4 **Special Compliance Tests:** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Permitting Authority. [Rule 62-297.310(7)(b), F.A.C.]
- 5.5 **Stack Testing Facilities:** The owner or operator shall install stack testing facilities in accordance with Rule 62-297.310(6), F.A.C..
- 5.6 **Exceptions and Approval of Alternate Procedures and Requirements:** An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Air Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in Rule 62-297.620, F.A.C.
- 5.7 **Operating Rate During Testing:** Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is

APPENDIX CSC

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2) and (3), F.A.C.]

SUBSECTION 6.0 REPORTS AND RECORDS

- 6.1 Duration: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [Rule 62-4.160(14)(b), F.A.C.]
- 6.2 Emission Compliance Stack Test Reports:
- (a) A *test report* indicating the results of the required compliance tests shall be filed with the Permitting Authority as soon as practical, but no later than 45 days after the last sampling run is completed. [Rule 62-297.310(8), F.A.C.]
 - (b) The *test report* shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.
- 6.3 Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the Permitting Authority within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
- 6.4 Annual Operating Report for Air Pollutant Emitting Facility: Before March 1st of each year, the owner or operator shall submit to the Permitting Authority this required report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year. [Rule 62-210.370(3), F.A.C.]

SUBSECTION 7.0 OTHER REQUIREMENTS

- 7.1 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not preclude the permittee from securing any other types of required permits, licenses, or certifications.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- 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:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and.
 - (c) 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) A description of and cause of non-compliance; and
 - (b) 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.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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.

- 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 (*X*)
 - (b) Determination of Prevention of Significant Deterioration (*X*); and
 - (c) Compliance with New Source Performance Standards ().
- 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.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

Marathon Generation Plant Unit No. 8
Florida Keys Electric Cooperative Association
PSD-FL-237 and 0870004-002-AC
Marathon, Monroe County

The Florida Keys Electric Cooperative Association (FKEC) plans to install a new Diesel Engine Generator at its existing Marathon Generation Plant (MGP) in Marathon, Monroe County. The unit is a General Motors Electro-Motive Diesel generator model 20-710G4B with a nominal base load rating of 3.58 megawatts (MW) at 32°C and 718 mm Hg. The facility currently consists of seven (7) diesel engine generators used for peaking power. Units 1 & 2 are each rated at 2.0 MW. Units 3, 4 and 5 are each rated at 3.0 MW, and Units 6 & 7 are 2.5 MW each. The existing Units 1-7 are allowed to burn No. 2 fuel oil with a sulfur content of 0.5 percent or less, by weight. The new Unit 8 will be fired with No. 2 low sulfur fuel oil with a sulfur content not to exceed 0.05 percent, by weight, and a fuel oil consumption limit of 2.015 million gallons per year. The facility also has four fuel oil storage tanks and other electrical generating support equipment.

FKEC has indicated that the maximum annual air pollutant emission rates in tons per year for the Unit 8 diesel generator, based on consumption of 2.015 million gallons of No. 2 fuel oil, with a maximum sulfur content of 0.05 percent, by weight, will be:

Pollutant	PSD Significance Levels ¹	Uncontrolled Emissions ²	Controlled Emissions ³	Expected Emissions ⁴	Subject to PSD Review?
NO _x	40	423	271	24.2	Yes
CO	100	111	<100	6.4	No
PM	25	9.5	9.1	0.6	No
PM ₁₀	15	7.9		0.5	No
SO ₂	40	7.2		0.5	No

¹ Florida Administrative Code 212.400-2

² Based on firing No. 2 fuel oil (0.05% sulfur by weight) at a maximum of 2.015 million gals/yr at full load with no emission controls.

³ Based on firing No. 2 fuel oil (0.05% sulfur by weight) at a maximum of 2.015 million gals/yr at full load with emissions control of timing retardation.

⁴ Based on FKEC's historical and projected actual operating hours of 500 or less.

Following is the BACT determination proposed by the applicant:

BACT DETERMINATION REQUESTED BY THE APPLICANT:

POLLUTANT	EMISSION LIMIT
Nitrogen Oxides	62 lbs/hr by timing retardation and aftercoolers

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

The Marathon Generation Power Plant is a major source of air pollution or Title V source. Because emissions of nitrogen oxides are greater than 250 tons per year, it is a major facility with respect to the Prevention of Significant Deterioration (Rule 62-212.400). Because the project will result in a significant increase in nitrogen oxides emissions per Table 62-212.400-2, F.A.C., "Regulated Air Pollutants - Significant Emissions Rates," a BACT determination is required pursuant to Rule 62-212.410, F.A.C.

DATE OF RECEIPT OF A BACT APPLICATION:

January 27, 1997

REVIEW GROUP MEMBERS:

Syed Arif (Permit Engineer, prepared BACT) and A. A. Linero (Administrator, reviewed BACT) New Source Review Section.

BACT DETERMINATION PROCEDURE:

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process

APPENDIX BD

BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as follows:

- **Combustion Products** (e.g., SO₂, NO_x, PM). Controlled generally by good combustion of clean fuels, removal in add-on control equipment.
- **Products of Incomplete Combustion** (e.g., CO, VOC). Control is largely achieved by proper combustion techniques.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis. Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO₂, H₂SO₄, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

BACT POLLUTANT ANALYSIS

NITROGEN OXIDES (NO_x)

Oxides of nitrogen (NO_x) are generated during fuel combustion by oxidation of chemically bound nitrogen in the fuel (fuel NO_x) and by thermal fixation of nitrogen in the combustion air (thermal NO_x). As flame temperature increases, the amount of thermally generated NO_x increases. Fuel type affects the quantity and type of NO_x generated. Generally, natural gas is low in nitrogen. However it causes higher flame temperatures and generates more thermal NO_x than oil or coal, which have higher fuel nitrogen content, but exhibit lower flame temperatures.

NO_x emissions represent a significant portion of the total emissions generated by this project, and must be minimized using BACT. A review of EPA BACT/LAER Clearinghouse (BACT Clearinghouse) information indicates that NO_x emissions at most small facilities are minimized by process control and good combustion practices.

The applicant has proposed modification of the combustion process through a combination of fuel injection timing retardation and cooling of combustion air resulting in exhaust temperature reduction. The design specific to FKEC's 20-710G4B includes a 4° injection timing retardation and a 4-pass aftercooler circuit with the addition of a separately cooled aftercooler circuit. The

APPENDIX BD

BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

combination of retarded injection timing and lowered combustion air temperature results in less NO_x formation.

Vendors data indicate that retarding injection timing will reduce NO_x formation by about 20 percent, but will increase PM emissions by about 10 percent and fuel consumption by 1.5 percent. The 4-pass aftercooler will reduce both NO_x and PM emissions by about 10 percent while reducing fuel consumption by about 0.7 percent. The separately cooled aftercooling circuit will decrease both NO_x and PM by another 10 percent and fuel consumption by 0.5 percent. The net result will be a 40 percent reduction in NO_x, a 5 percent increase in PM and about 0.3 percent increase in fuel consumption. The use of low sulfur fuel oil will minimize PM emissions thus reducing or eliminating the increase in PM caused by NO_x controls. **This combination of NO_x controls, proper engine design, good combustion practices, and the use of low sulfur fuel should provide effective emissions control.**

BACT DETERMINATION BY DEP:

Based on the information provided by the applicant and the information searches conducted by the Department, lower emissions limits can be obtained employing the top-down BACT approach for NO_x.

NO_x DETERMINATION

The top-down BACT approach for diesel fired internal combustion engines listed in order from most stringent control to least:

1. Selective Catalytic Reduction (SCR)
2. Combined technologies of injection timing retardation, turbocharger with aftercoolers
3. Good combustion design/practices

The following table summarizes the feasibility of using these control technologies with the EMD 20-710G4B as designed for installation in FKEC's Marathon Generation Plant.

Control Technology	Emission Reduction (%)	Technically Feasible	Cost Effective	Adverse Environ. Impacts	Adverse Energy Impacts
SCR with ammonia	60-90	No	N/A	N/A	N/A
SCR with urea	80	No	N/A	N/A	N/A
Timing retard; turbo charger aftercoolers	40	Yes	Yes	No	0.3%
Dry/Low NO _x	18	No	N/A	N/A	N/A

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

SCR is more widely used in Japan and Germany than it is in the United States and the technology is being improved such that the hazards and costs have been reduced. It remains, however, a costly technology for small applications and has hazards associated with the use and storage of ammonia. SCR is not generally used with diesel engines of this size. The BACT/LAER database lists only a single facility which uses SCR on diesel engines. SCR was selected in that instance because a local ordinance mandated strict limits on emissions without regards to cost. SCR is not technically feasible for this diesel engine because the exhaust back pressure maximum allowance for the EMD 20-710G4B is 5 inches H₂O. An SCR system will add 5 to 6 inches H₂O back pressure, exceeding the manufacturers specifications and recommendations.

For NO_x emissions, the Department accepts the applicants proposed use of injection timing retardation and cooling of combustion air as BACT for this project.

The BACT emission levels established by the Department are as follows:

POLLUTANT	EMISSION LIMIT
Nitrogen Oxides (NO _x)	62 lbs/hr (271 TPY)
Visible Emissions	20%

COMPLIANCE

Compliance with the visible emission limitations shall be in accordance with the EPA Reference Method 9 as contained in 40 CFR 60, Appendix A.

Compliance with the NO_x limitations shall be in accordance with the EPA Reference Method 7E as contained in 40 CFR 60, Appendix A.

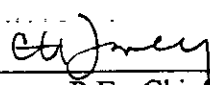
DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Syed Arif, Review Engineer (prepared BACT)
A. A. Linero, Administrator, New Source Review Section (reviewed BACT)
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

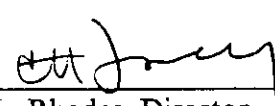
Recommended By:

Approved By:




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

for



Howard L. Rhodes, Director
Division of Air Resources Management



Date:



Date:

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THRU: Clair Fancy
Al Linero

HOWARD
DO NOT
SIGN

FROM: Syed Arif *Syed Arif*

DATE: September 12, 1997

SUBJECT: Florida Keys Electric Cooperative Association, Inc., 0870004-002-AC,
PSD-FL-237

Attached for approval and signature is a construction permit number 0870004-002-AC, PSD-FL-237 for Florida Keys Electric Cooperative Association, Inc., Marathon Generation Plant's 3.58 MW diesel generator (Unit No. 8) to be located in Marathon, Florida. A Technical Evaluation and Preliminary Determination was issued, and the facility was required to do a public notice.

The new unit is a source of nitrogen oxides emissions which are controlled by timing retardation and turbocharger aftercoolers. Use of 0.05 percent diesel fuel insures that particulate and sulfur dioxide emissions will be minimized. Because of the short stacks on this unit as well as the other seven generators at the site, it was necessary for FKEC to take restrictions on their operations to avoid consumption of increment.

The project modification provides reasonable assurance that all the requirements of the permit and BACT determination will be complied with. I recommend your approval and signature.