

DRAFT

Mr. Al A. Linero
Dept. of Environmental Protection
New Source Review Section
Mail Station 5505
2600 Blairstone Rd.
Tallahassee, FL 32399-2400

**Re: Comment on NO_x emission hourly requirement in Draft Permit No. 0870004-002-AC
(PSD-FL-237)**

25 August 1997

Dear Mr. Linero:

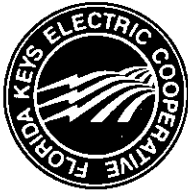
After discussions between my staff and Mr. David Knowles (DEP, Ft. Myers) and Mr. Syed Arif of your office, I am writing to comment on the Draft permit referenced above. Our vendor, Engine Systems, Inc., has expressed concern that Florida Keys Electric Cooperative Association, Inc.'s (FKEC) new diesel unit No. 008 (EMD 20-710G4B) might not meet the proposed hourly NO_x emission requirement of 62 lb/hr as specified in the draft permit (Emission Limitation B.1, in Section III, page 5 of 8). This specific condition limitation is also referenced on pages BD-1 and BD-5. The 62 lb/hr NO_x emission rate is a theoretical value based on EPA emission factors and fuel consumption combined with proposed emissions reduction Best Available Control Technology.

FKEC requests that the NO_x hourly emission limitation be increased to 71.0 lb/hr in the final permit. Our vendor is confident that FKEC's unit No. 008 will meet that requirement. Please call if any further action is required on our part. Thank you for your assistance.

Sincerely,

Charles A. Russell
General Manager and
Chief Executive Officer

pc:
S. Arif, DEP
T. Planer, FKEC
D. Shaw, FKEC



**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

August 15, 1997

Mr. Clair Fancy, Bureau Chief
Bureau of Air Regulation
2600 Blair Stone Road, Mail Station #5505
Tallahassee FL 32399 2400

Re: Proof of Public Notice of Intent to Issue
Air Construction Permit
The Miami Herald, advertised August 13, 1997

Dear Mr. Clair:

In her absence, Deborah Shaw asked that I send the publication as listed above to DEP. This is a follow-up to a copy that was faxed to you on 8/14/97.

Enclosed is a copy of the announcement and a copy that shows the information on the Notary's stamp.

Please advise Ms. Shaw or me if you require any additional information.

Sincerely,

Janice Allen

Janice Allen
Director of Administration and
Assistant to General Manager

JA/ljl

cc: S. Arif, BAC
SD Branch
SD
EPA
NPS

ja97017.wpd

RECEIVED

AUG 18 1997

**BUREAU OF
AIR REGULATION**

PUBLISHED DAILY
MIAMI-DADE-FLORIDA



STATE OF FLORIDA
COUNTY OF DADE

The Miami Herald Publishing Company

Before the undersigned authority personally
appeared:

ROSEMARY PINO

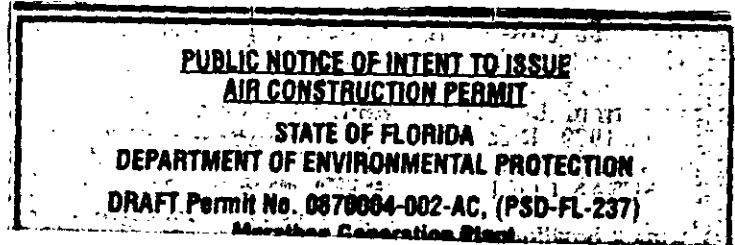
who on oath says that he/she is"

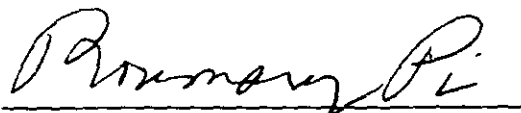
CUSTODIAN OF RECORDS

of The Miami Herald, a daily newspaper published at
Miami in Dade County, Florida; that the attached
copy of advertisement was published in said
newspaper in the issues of:

AUGUST 13, 1997

Affiant further says that the said The Miami Herald
is a newspaper published at Miami, in the said Dade
County, Florida and that the said newspaper has
heretofore been continuously published in said Dade
County, Florida each day and has been entered as
second class mail matter at the post office in Miami,
in said Dade County, Florida, for a period of one
year next preceding the first publication of the
attached copy of advertisement; and affiant further
says that he has neither paid nor promised any
person, firm or corporation any discount, rebate,
commission or refund for the purpose of securing
this advertisement for publication in the said
newspapers(s).





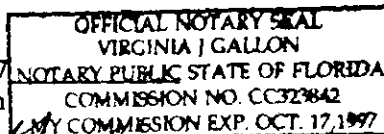
Sworn to and subscribed before me this

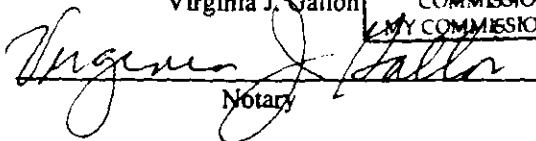
13TH DAY OF AUGUST, 1997

My Commission

Expires: October 17, 1997

Virginia J. Gallon




Notary



PUBLISHED DAILY
MIAMI-DADE-FLORIDA

STATE OF FLORIDA
COUNTY OF DADE

The Miami Herald Publishing Company

Before the undersigned authority personally
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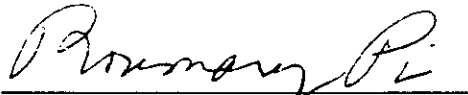
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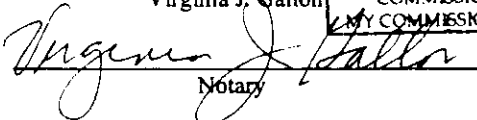
Sworn to and subscribed before me this

13TH DAY OF AUGUST, 1997

My Commission

Expires: October 17, 1997

Virginia J. Gallon


Notary

OFFICIAL NOTARY
VIRGINIA J. GALLON
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. 123456789
MY COMMISSION EXPIRES 10/17/97

One Herald Plaza, Miami, Florida

**PUBLIC NOTICE OF INTENT TO ISSUE
AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit No. 0870004-002-AC, (PSD-FL-237)
Marathon Generation Plant
Monroe County

The Department of Environmental Protection (Department) gives notice of its
intent to issue an air construction permit to Florida Keys Electric Cooperative
Association, Inc., for Unit 8 located at Marathon Generation Plant, 3421 Overseas
Highway, Marathon, Monroe County. A Best Available Control Technology (BACT)
determination was required for nitrogen oxides (NOx), pursuant to Rule
62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration
(PSD). The applicant's name and address are: Florida Keys Electric Cooperative
Association, Inc., 91605 Overseas Highway, P.O. Box 700377, Tavernier, Florida
33070-0377.

This permit is for installation of a 3.58 megawatt diesel generator designated
as Unit 8. The diesel generator will burn No. 2 fuel oil with a sulfur content of
0.05 percent or less, by weight. Controls for NOx emissions consist of timing
retardation and turbocharger aftercoolers. The diesel generator is allowed to
operate continuously with the fuel oil usage limited to 2.015 million gallons per
year. Additionally, enforceable conditions are included on Units 1-7 to limit the
hours of operation and fuel usage thus insuring that there will be no predicted
violations of any ambient air quality standards or PSD increments.

An air quality impact analysis was conducted. Emissions from the facility will
consume PSD increment but will not significantly contribute to or cause a
violation of any state or federal ambient air quality standards. The maximum
predicted PSD Class II annual nitrogen dioxide (NO2) increment consumed by all
sources in the area, including this project, will be as follows:

PSD Class II Increment Consumed (ug/m ³)	Allowable Increment (ug/m ³)	Percent Increment Consumed
18.8	25	75

The project has no significant impact on the Everglades National Park PSD
Class I area.

The Department will issue the FINAL Permit, in accordance with the conditions
of the DRAFT Permit unless a response received in accordance with the following
procedures results in a different decision or significant change of terms or
conditions.

The Department will accept written comments and requests for public
meetings concerning the proposed DRAFT Permit issuance action for a period of
30 (thirty) days from the date of publication of this Notice. Written comments and
requests for public meetings should be provided to the Department's Bureau of
Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida
32399-2400. Any written comments filed shall be made available for public
inspection. If written comments received result in a significant change in this
DRAFT Permit, the Department shall issue a Revised DRAFT Permit and require, if
applicable, another Public Notice.

The Department will issue FINAL Permit with the conditions of the DRAFT
Permit unless a timely petition for an administrative hearing is filed pursuant to
Sections 120.569 and 120.57 F.S. The procedures for petitioning for a hearing are
set forth below. Mediation is not available for this action.

A person whose substantial interests are affected by the Department's
proposed permitting decision may petition for an administrative hearing, in
accordance with Sections 120.569 and 120.57 F.S. The petition must contain the
information set forth below and must be filed (received) in the Office of General
Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35,
Tallahassee, Florida 32399-3000; telephone: 850/488-9370, fax: 850/487-4938.
Petitions must be filed within fourteen days of publication of the public notice or
within fourteen days of receipt of this notice of intent, whichever occurs first. A
petitioner must mail a copy of the petition to the applicant at the address
indicated above, at the time of filing. The failure of any person to file a petition
within the appropriate time period shall constitute a waiver of that person's right
to request an administrative determination (hearing) under Section 120.569 and
120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any
subsequent intervention will be only at the approval of the presiding officer upon
the filing of a motion in compliance with Rule 28-5.207 of the Florida
Administrative Code.

A petition must contain the following information: (a) The name, address, and
telephone number of each petitioner, the applicant's name and address, the
Permit File Number and the county in which the project is proposed; (b) A
statement of how and when each petitioner received notice of the Department's
action or proposed action; (c) A statement of how each petitioner's substantial
interests are affected by the Department's action or proposed action; (d) A
statement of the material facts disputed by petitioner, if any; (e) A statement of
the facts that the petitioner contends warrant reversal or modification of the
Department's action or proposed action; (f) A statement identifying the rules or
statutes that the petitioner contends require reversal or modification of the
Department's action or proposed action; and (g) A statement of the relief sought
by the petitioner, stating precisely the action that the petitioner wants the
Department to take with respect to the Department's action or proposed action
addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final
agency action, the filing of a petition means that the Department's final action
may be different from the position taken by it in this notice of intent. Persons
whose substantial interests will be affected by any such final decision of the
Department on the application have the right to petition to become a party to the
proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal
business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal
holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
South District
2205 Victoria Avenue, Suite 304
East Miami, Florida 33133