

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 8, 2002

Mr. E. David Fernandez
Utility Director
City of Key West
Southernmost Waste-to-Energy Facility
P. O. Box 1409
Key West, Florida 33041-1409

Re: Section 111(d) Compliance Schedule Progress and Applicable Requirements

Dear Mr. Fernandez:

Please refer to the attached Compliance Schedule that applies to the municipal waste combustion units at your facility (ID. No. **0870047**). This Compliance Schedule is a requirement of Rule 62-204.800(8)(e), F.A.C. The first Increment of Progress scheduled event, "Submit Final Control Plan", was due on September 30, 2001. On August 29, 2002, a letter was sent to you requesting the "Final Control Plan". Please provide us a copy of this Final Control Plan submission as soon as possible.

In addition, your initial Title V Permit was issued/effective on December 31, 1999. On December 6, 2000, the regulations at 40 CFR Part 60, Subpart BBBB, Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or before August 30, 1999, became applicable to your facility. Since the additional applicable requirements became applicable to your facility and there is more than 3 (three) years left on your permit as of the effective date of the new regulations, the Department is required to open your Title V Permit for cause and install these requirements in accordance with Rules 62-4.080(1) and 62-213.430(4), F.A.C., and 40 CFR 70.7(f). In order to incorporate the specific applicable requirements of 40 CFR Part 60, Subparts A and BBBB, into your Title V Permit, please provide the specific rule cites of these applicable regulations for your facility and affected emissions units.

If there are any questions, please give Bruce Mitchell a call at 850/413-9198.

Sincerely,

Scott M. Sheplak, P.E.
Program Administrator
Title V Section

Attachment

"More Protection, Less Process"

Printed on recycled paper.

Source Inventory

The two sources in Florida that are subject to 40 CFR 60, Subpart BBBB, are the following. Both sources have valid air operating permits. Each facility has two SMWC units.

1. Bay County Resource Recovery Facility, Panama City (Class I).
2. Southernmost Waste-to-Energy Facility, City of Key West (Class II).

Compliance Schedules and Increments of Progress

All affected SMWCUs shall comply with all the requirements of Rule 62-204.800(8)(e), F.A.C., and achieve final compliance or cease operation as expeditiously as practicable but not later than the earlier of (1) December 6, 2005, or (2) three years after the effective date of State Plan approval by the EPA. The individual compliance schedules for meeting increments of progress and achieving final compliance, as outlined in each facility's final control plan, are given below.

Table 1. Increments of Progress

| Increments of Progress | Source | |
|------------------------------|------------|--------------|
| | Bay County | Southernmost |
| Submit Final Control Plan | 09/30/01 | 09/30/01 |
| Award Contracts | 05/01/04 | 09/30/02 |
| Begin Onsite Construction | 06/01/04 | 05/31/03 |
| Complete Onsite Construction | 07/15/05 | 12/01/03 |
| Achieve Final Compliance | 11/15/05 | 03/01/04 |

Emissions Limits and Inventory

Table 2 is a summary list of the applicable emission limiting standards for all SMWCUs subject to 40 CFR 60, Subpart BBBB.

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
PROPOSED SECTION 111(d) STATE PLAN**



**SMALL MUNICIPAL WASTE COMBUSTION UNITS
November 29, 2001**

*Florida Department of Environmental Protection • Division of Air Resources Management
2600 Blair Stone Road • MS 5500
Tallahassee, Florida 32399-2400 • (850) 488-0114*



September 17, 2002

THE CITY OF KEY WEST

Mr. Scott M. Sheplak, P.E.
Administrator
Title V Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

P.O. BOX 1409
KEY WEST, FL 33041-1409
www.keywestcity.com

RECEIVED

SEP 30 2002

Re: Final Control Plan compliance schedule
Southernmost Waste to Energy Facility
Permit No. 0870047-001 AV

BUREAU OF AIR REGULATION

Dear Mr. Sheplak:

As per your letter dated August 29, 2002, please find attached the Final Control Plan for the Southernmost Waste to Energy Facility and a letter addressing Mr. Panchakarla's RAI. This plan was submitted to the FDEP on September 26, 2001.

Due to city capital budget freezes the first two quarters after the September 11 attack on the world trade center, and the unexpected amount of time it has taken to prepare proper RFP documents for contract award, the city would like to ask the department to accept this updated timeline to the Final Control Plan.

| | |
|------------------------------|-------------------------|
| Submit Final Control Plan | Completed |
| Award Contracts | July 31, 2003 |
| Begin Onsite Construction | April 30, 2004 |
| Complete Onsite Construction | May 31, 2005 |
| Achieve Final Compliance | October 30, 2005 |

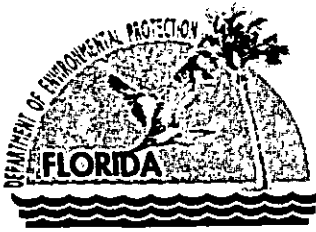
Please contact my office if you have any questions or need any further information.

R.B. Havens

Plant Manager
Southernmost Waste-to-Energy Facility
(305) 293-6409
rbhaves@keywestcity.com

cc: Venkata Panchakarla, FDEP Tallahassee
Ronald Blackburn, FDEP Fort Meyers
Jim Edds, FDEP Marathon
File

cc: Lanny Geage, OPA&M 1/7/03



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 29, 2002

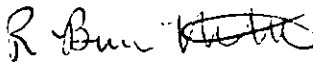
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for Scott M. Sheplak, P.E.
Administrator
Title V Section

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**SMALL MUNICIPAL WASTE COMBUSTION UNITS
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