



SD

THE CITY OF KEY WEST

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April 29, 2002

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

APR 30 2002

BUREAU OF AIR REGULATION

Re: Major HAP Sources

Dear Ms. Phillips:

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In response to your letter dated April 5, 2002, the City does not believe our Reciprocating Internal Combustion Engine (Emergency Generator) to be a major HAP source. The total consumption of diesel fuel for calendar year 2001 was only 605.9 gallons. According to data obtained from the DEP AP-42 site, this would equate to an estimated .014tons per year of HAP's for that source.

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The Southernmost Waste to Energy Facility, located at 5701 W. College Road, Key West Florida, has two Mass Burn MSW incinerators with a common emission stack. After review of the data submitted to the FDEP in the 2001 AOR, listed as Municipal Solid Waste Combustors Unit 1 and Unit 2, the City believes that the incinerators may be a major source of HAP's in the Industrial, Commercial and Institutional Boilers category.

It must be noted that the City has an approved Final Control Plan with the FDEP to retrofit the facility with flue gas conditioners and bag houses by March 1, 2004. This should create a 70% to 90% reduction in emissions. Once the retrofit is completed the City will notify the FDEP of any significant changes to the estimated HAP production of the two Units.

If you have any questions, or need any additional information, please do not hesitate to call me at (305) 293-6409.

Sincerely,

E. David Fernandez
Utilities Director
City of Key West

cc: Jim Edds, FDEP, Maratho
Bill Krumbholz, FDEP, Fort Meyers
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