From:	Zuczek, Jeffrey
To:	Holtom, Jonathan
Cc:	Hampp, John; Archer, Mary; Washington, Kevin; Cocotos, Peter; Boswell, Greg; Svec, Ed; Zuczek, Jeffrey
Subject:	FPL INQUIRY ON RICE LANGUAGE FOR RENEWAL APPLICATION NO. 1270009-024-AV, SANFORD POWER PLANT
Date:	Wednesday, April 30, 2014 1:46:34 PM
Attachments:	Potential Comments.docx
Importance:	High

Jon - Attached are potential comments on the Sanford Title V renewal permit (similar to those submitted with the "pre-draft" effort). Since I have worked with you in a variety of permits related to RICE engines in the past few years for Title V renewals, coupled with the fact that you are the FL contact for RICE subject matter, I would like your input and opinion in this matter. As the language currently stands, FPL believes it is 1) unclear for operators and site personnel at our facilities, and 2) contrasts the formatting and clarity of language in other FPL Title V permits for RICE engines (please especially note the "if" clauses).

FPL's view is that the supplied engine specifications and emergency classification of engines provide clear understanding to the Department of the engine type(s). Operators may read the permit, see the "if" clauses, and question whether permit conditions are valid. Furthermore, some conditions reference NESHAP rule language, rather than the conditions in the permit, even though the referenced language is already copied into the permit (within the conditions and appendices) and rule references are located at the end of specific conditions.

Please note that FPL still currently has the ability to request an Extension of Time for an Administrative Hearing, though we believe that these clarifications and typos can be easily adjusted.

I would appreciate your input on this concern. Please advise if the Department is available for a conference call tomorrow, Thursday, May 1st.

Thank you,

Jeff

-----Original Message-----
From: Zuczek, Jeffrey
Sent: Tuesday, April 29, 2014 5:14 PM
To: Svec, Ed (Ed.Svec@dep.state.fl.us)
Cc: Zuczek, Jeffrey
Subject: FW: RENEWAL APPLICATION NO. 1270009-024-AV, SANFORD POWER PLANT
Importance: High

Ed - Attached are "potential" comments that we are looking at for the RICE to clarify language for operators and site personnel. I wanted to touch base with you prior to issuing the public notice, which we have potentially slated for May 2nd. We can discuss if this language can be adjusted now, with issuance of another Official Draft, or if these can be brought up for change during the 30-day public comment period.

Thank you,

Jeff

-----Original Message-----
From: EPOST_AIR_TAL@dep.state.fl.us [mailto:EPOST_AIR_TAL@dep.state.fl.us]
Sent: Monday, February 17, 2014 11:24 AM
To: Smith, Jeff
Cc: Zuczek, Jeffrey; kkosky@golder.com; Ed.Svec@dep.state.fl.us; EPOST_AIR_TAL@dep.state.fl.us; EPOST_AIR_CD@dep.state.fl.us; barbara.friday@dep.state.fl.us
Subject: RENEWAL APPLICATION NO. 1270009-024-AV, SANFORD POWER PLANT

Dear Applicant:

Our office has received the air pollution permit application that you submitted for the project described below:

Facility Owner/Company Name: FLORIDA POWER & LIGHT (PSN)
Site Name: SANFORD POWER PLANT
Project Name: AB261-TITLEVRENEWAL
Project Description: Renewal of facility's Title V air operation permit.
Application Project No: 1270009-024-AV
Application Received Date: 02/14/2014
Permit Application Processor: Ed Svec
Permit Application Processor Phone: 850-717-9031
Permit Application Processor Email: Ed.Svec@dep.state.fl.us

We will review the application in a timely manner and contact you soon if any additional information is needed in order to process it. To avoid formal written requests for additional information, we encourage our permit processors to contact you directly by e-mail or by phone to resolve any questions or provide missing information. Our goal is to reduce the overall time required to process your application. We appreciate your efforts to help us meet this goal by ensuring that your response to any of our questions is timely, thorough and complete. If no additional information is required from you to process the application, we will be sending you a draft of the permit for your review and comment.

If you have any questions, or if you received this email in error, please contact the Permit Application Processor listed above by phone or e-mail. You may also schedule a meeting or teleconference with the Permit Application Processor at any time during the application review process.

Best Regards,

Florida Department of Environmental Protection Division of Air Resource Management
2600 Blair Stone Road, MS. 5500
Tallahassee, FL 32399
Tel. 850-717-9000

Please do not reply to this auto-generated email.

[Dep Customer Survey]<http://survey.dep.state.fl.us/?refemail=EPOST_AIR_TAL@dep.state.fl.us>