



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 28, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert R. Padron, General Manager
Utility Board of the City of Key West
Post Office Drawer 6100
Key West, Florida 33041-6100

RE: Key West, City Electric System
Proposed relocation of 23-MW combustion turbine
Permit File No. AC44-245399, PSD-FL-210

Dear Mr. Padron:

The Department received your letter dated June 10, 1994, on June 30, 1994, in response to the Department's March 10, 1994 letter for relocation of an existing permitted 23 MW simple cycle combustion turbine from the Key West Power Plant to the Stock Island Power Plant. Some additional information on modeling was received as late as July 18, 1994. Based on the review of this additional information, we have determined that your application is still incomplete. The following information is required in order to continue processing this application package:

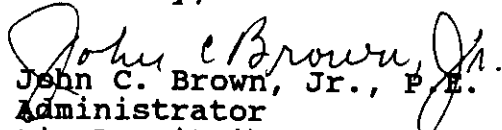
1. Please provide 30-day rolling averages of the water to fuel ratio at different loads for a period of one year since the last compliance test was conducted, and compare it to the ratio of water to fuel for that load utilized during the March 1993 compliance test. Please note that the Department is also interested in looking at the water to fuel ratios when the turbine was operating within 10% of its rated capacity, even though the March 1993 compliance test did not achieve that rate.
2. Please provide the excess emissions data as required by 40 CFR 60.334(c)(1) for the same time period as Item 1.
3. Building downwash effects should be included in all ISC2 modeling runs. The Department ran ISC2 for five years, with building downwash effects included, using the 59°F, 50% load condition for emission and stack parameters. Highest predicted short-term impacts for SO₂ and PM/PM₁₀

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were well above significant impact levels. Please do a full impact analysis, which includes building downwash effects and all sources within the significant impact area, for comparison with all applicable standards, PSD Class II increments and de minimus levels.

If you have any questions regarding this matter, please write or call Syed Arif, review engineer, or Cleve Holladay, meteorologist, at (904) 488-1344. We will resume processing this application after receipt of the requested information.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting & Standards

JB/SA/bjb

cc: D. Knowles, SD
J. Harper, EPA
J. Bunyak, NPS

Is your RETURN ADDRESS completed on the reverse side?

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- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Robert R. Padron, Generam Mgr.
 Utility Board of the City of Key
 West
 Post Office Drawer 6100
 Key West, Florida 33041-6100

4a. Article Number
 P 872 562 704

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
 8-2-94

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
 8/2/94 [Signature]

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

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P 872 562 704



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Send to	Robert R. Padron
Street and No.	P.O. Drawer 6100
City, State and ZIP Code	Key West, FL 33041
Postage	\$
Certified Fee	
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Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
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TOTAL Postage & Fees	\$
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PS Form 3800, JUNE 1991