



(305) 295-1000
1001 James Street
PO Box 6100
Key West, FL 33041-6100
www.KeysEnergy.com

UTILITY BOARD OF THE CITY OF KEY WEST

August 27, 2009

Jonathan Holtom, P.E., CPM
Title V Program Administrator
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RECEIVED

SEP 08 2009

BUREAU OF AIR REGULATION

Re: Response to Title V Renewal Application Request for Additional Information
Stock Island Power Plant - DEP File No. 0870003-011-AV

Dear Mr. Holtom:

In response to the Request for Additional Information issued by the Florida Department of Environmental Protection on July 8, 2009, Keys Energy Services and Florida Municipal Power Agency are pleased to submit the following information regarding the Stock Island Power Plant Title V Air Operation Permit renewal application.

The following are our responses to each numerical item listed in the Department's letter. A copy of the original letter is enclosed for your reference.

1. The Facility Plot Plan, Process Flow Diagram, Precautions to Prevent Emissions of Unconfined Particulate Matter, List of Insignificant Activities, and Identification of Applicable Requirements are enclosed. A Risk Management Plan is not required for the facility at this time. Per Item 3 below, a selective catalytic reduction has not been installed and therefore, aqueous ammonia is not used or stored at the facility.
2. The following items are enclosed for each emission unit: Process Flow Diagram, Fuel Analysis or Specification (one analysis from the last fuel shipment is provided for the entire facility), Detailed Description of Control Equipment, Procedures for Startup and Shutdown, Operation and Maintenance Plan, and Emission Unit Specific Applicable Requirements.
3. A selective catalytic reduction system is not required at this time for Emission Unit 011. The unit has not operated for more than 2500 hours in any 12 month rolling period (see permit condition F.1.3).

4. The updated Acid Rain Part Application, the Retired Unit Exemption Form, and the New Unit Exemption Forms were submitted separately to the Department. Additional copies are enclosed for your convenience.
5. All of the engines at our facility are existing compression ignition engines and are not subject to 40 CFR 63 Subpart ZZZZ or 40 CFR 60 Subparts IIII or JJJJ. Please see the attached letter from Jerome Guidry.

It is our intention to replace our three peaking generators included as part of Emissions Unit 010 with a 2.2 MW emergency generator. A list of specifications for the proposed unit is attached. As indicated in Mr. Guidry's letter, we are willing to accept an annual fuel usage limit of 32,000 gallons of diesel per year so that this unit qualifies for a categorical exemption from permitting. We would like to include this new unit as part of the new Title V permit and we will install the new unit as soon as the new Title V permit is effective.

In addition to the above, DEP Form No. 62-210.900(1), Responsible Official Certification Statement, is also enclosed.

Please contact Amy Deese at 321-239-1004 if you have any questions or require additional information.

Sincerely,

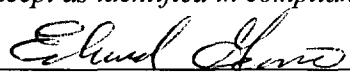


Edward Garcia
Director of Generation
Edward.Garcia@Keysenergy.com

c: Sherrill Culliver, FDEP SW District
Susan Machinski, FDEP SW District
Jerome Guidry, Perigee Technical Services, Inc.
Amy Deese, FPMA
Jerusha Gibson, FMPA

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name: Edward Garcia, Director of Generation
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input checked="" type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Keys Energy Services Street Address: 1001 James Street, PO Box 6100 City: Key West State: FL Zip Code: 33041-6100
4. Application Responsible Official Telephone Numbers... Telephone: (305) 295-1134 ext. Fax: (305) 295-1145
5. Application Responsible Official E-mail Address: Edward.garcia@keysenergy.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature <u>9/1/2009</u> Date

DESK COPY

**Keys Energy Services
STOCK ISLAND POWER PLANT
Facility Attachments**

STOCK ISLAND POWER PLANT

LIST OF INSIGNIFICANT ACTIVITIES/UNITS

ACTIVITY/UNIT	RATIONALE FOR INSIGNIFICANCE
I.C. Engine - very small portable fire pump	Exempt pursuant to Rule 62-210.300(3)(a)20, FAC
I.C. Engine - 244 hp Cummins, diesel fired water pump	Exempt pursuant to Rule 62-210.300(3)(a)20, FAC
I.C. Engine - small mobile compressor	Exempt pursuant to Rule 62-210.300(3)(a)20, FAC
I.C. Engine - 115 kW Portable Generator	Exempt pursuant to Rule 62-210.300(3)(a)20, FAC
I.C. Engine - ~25 kW Portable Welder	Exempt pursuant to Rule 62-210.300(3)(a)20, FAC
I.C. Engine - Detroit Diesel, diesel fired black start	Exempt pursuant to Rule 62-210.300(3)(a)20, FAC
No. 2 Fuel Oil Storage Tank #1 - 500,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 931 lbs/yr
No. 2 Fuel Oil Storage Tank #2 - 500,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 931 lbs/yr
No. 2 Fuel Oil Storage Day Tank #1 - 16,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 108 lbs/yr
No. 2 Fuel Oil Storage Day Tank #2 - 16,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 108 lbs/yr
No. 2 Fuel Oil Storage Tank - 1,904,953 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 15 lbs/yr
Fleet Fuel Tank #1 (unleaded gasoline) - 2,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions less than 0.5 tons/yr
Fleet Fuel Tank #2 (gasoline) - 2,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions less than 0.5 tons/yr
Fleet Fuel Tank #3 (gasoline) - 2,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions less than 0.5 tons/yr
Fleet Fuel Tank #4 (diesel) - 2,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions less than 1 lb/yr
Diesel Fire Pump No. 2 Fuel Oil Storage Tank - ~2.5' dia x 6' side	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions very small
Compressed hydrogen bottles	Exempt pursuant to Rule 62-213.430(6), FAC; No emissions
Lube Oil Storage Tank - 10,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Very low vapor pressure and throughput
Waste Oil Storage Area	Exempt pursuant to Rule 62-213.430(6), FAC; Used oil stored in closed 250 gallon ConVault Tank; No emissions
Turbine Oil Storage Area	Exempt pursuant to Rule 62-213.430(6), FAC; Oil stored in closed 250 gallon ConVault Tank; No emissions
Hazardous Materials Containment Area	Exempt pursuant to Rule 62-213.430(6), FAC; Materials stored in closed containers; No emissions
Hazardous Waste Containment Area	Exempt pursuant to Rule 62-213.430(6), FAC; Materials stored in closed containers; No emissions
Wastewater Retention Tank	Exempt pursuant to Rule 62-213.430(6), FAC; No emissions
Miscellaneous painting activities	Exempt pursuant to Rule 62-210.300(3)(a)22, FAC
Miscellaneous welding activities	Exempt pursuant to Rule 62-210.300(3)(a)16, FAC
Storage & use of chemicals solely for water treatment	Exempt pursuant to Rule 62-213.430(6), FAC; Very low vapor pressures and small quantities/DEP presumptive exemption
Parts Washers (4) (hydrocarbon solvent)	Exempt pursuant to Rule 62-210.300(3)(a)24, FAC
Oil/Water Separator	Exempt pursuant to Rule 62-213.430(6), FAC; Very low pressures; No emissions

Compliance Report and Plan

Each emissions unit [(3) hi-speed diesel units (EUs 010), (2) MSD unit's (005 and 006), and (3) gas turbine units (007, 008 and 009)] is in full compliance with each applicable federal, state and local regulation as detailed in the Applicable Requirements attachments and the existing Title V Air Permit (Permit Number 0870003-001-AV).

The medium speed diesel units (EU 005 and 006) exhaust stacks are cleaned on a semi-annual bases to minimize particulate emissions. Opacity and NO_x emissions from these units are monitored by continuous emissions monitoring systems (CEMS) that are calibrated and maintained in accordance with a Quality Assurance Plan maintained on site. Quarterly CEMS reports are assembled and submitted to the FDEP.

Keys Energy Services operates and maintains continuous monitoring systems (CMS) to record fuel consumption, the ratio of water to fuel flow, and the electrical output for each combustion turbine unit (EU 007, 008, and 009). Quarterly CMS reports are assembled and submitted to the FDEP.

Annual emissions compliance tests are conducted for the medium speed diesel engines (EUs 005 and 006) and the combustion turbine units (EUs 007, 008, and 009) in accordance with the current existing Title V Air Permit requirements. Additionally, EPA Method 9 tests are performed annually for all units (EUs 005 through 010).

**Keys Energy Services
STOCK ISLAND POWER PLANT
Precautions to Prevent Emissions of Uncontrolled Particulate Matter**

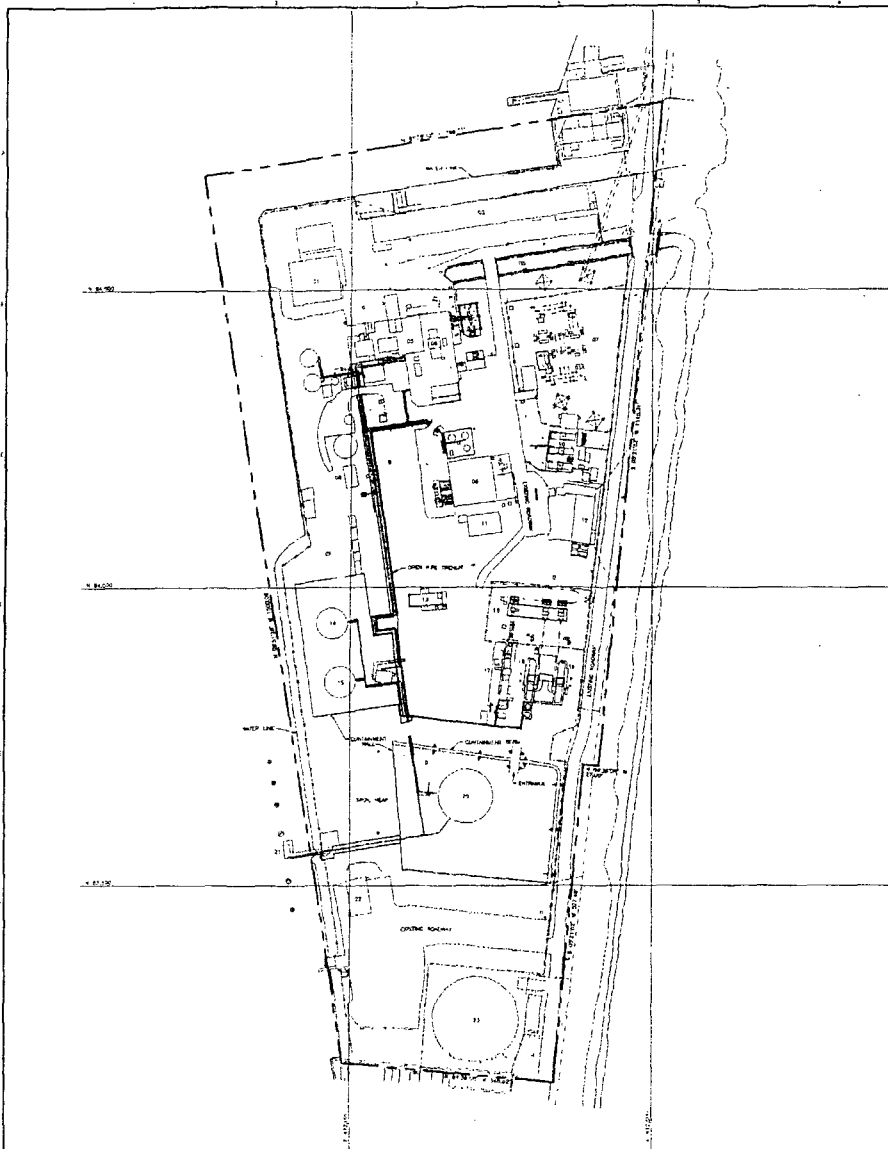
Precautions taken to prevent and control unconfined emissions of particulate matter include receiving delivery of fuel oil by barge rather than trucks and using paved surfaces for the fuel trucks which deliver vehicle fuel. Additionally, watering will be used on an as-needed basis to prevent emissions from unpaved areas.

Keys Energy Services
STOCK ISLAND POWER PLANT
List of Applicable Regulations

Facility

Regulation

40CFR 70 -State Operating Permits
40CFR 72 -Regulations on Permits
40CFR73 -SO₂ Allowance System
40CFR75 -Regulations for CEMS under Acid Rain Requirements
40CFR 77 -Excess Emissions for Acid Rain Units
40CFR 78 -Appeal Procedures for Acid Rain Units
40CFR60.7 -Notification and Recordkeeping (NSPS)
40CFR60.8 -Performance Tests (NSPS)
40CFR60.11 -Compliance with Standards and Maintenance Requirements (NSPS)
40CFR60.12 -Circumvention (NSPS)
40CFR60.13 -Monitoring Requirements (NSPS)
40CFR60.19 -General Notification and Reporting Requirements (NSPS)
40CFR60, Subpart GG -Standards of Performance for Stationary Gas Turbines (NSPS)
62-4.001 through 62-4.160, FAC -Permits Part I General
62-4.210, FAC -Construction Permits
62-4.220, FAC -Operation Permit for New Sources
62-210, FAC -Stationary Source - General Requirements
62-212.300, FAC -General Preconstruction Review Requirements
62-212.400, FAC -Prevention of Significant Deterioration (PSD)
62-213, FAC -Operation Permits for Major Sources of Air Pollution (Title V)
62-204.240, F AC -Ambient Air Quality Standards
62-281, FAC -Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling
62-296.320(4)(b), FAC -General Visible Emission Standard
62-296.320(2), FAC -General Pollutant Emission Limiting Standards, Objectionable Odor Prohibited
62-297.310, F AC -General Compliance Test Requirements
62-297.620, F AC -Exceptions and Approval of Alternative Procedures and Requirements
40CFR82 -Servicing of Motor Vehicle Air Conditioners
62-296.320(4)(c), FAC -Unconfined Emissions of Particulate Matter
62-297.401, FAC -Compliance Test Methods



EXISTING FACILITIES LEGEND

ID	FACILITY	FOUNDATION	CONCRETE	REMARKS
01	WATER TOWER			
02	WATER TOWER			
03	WATER TOWER			
04	WATER TOWER			
05	WATER TOWER			
06	WATER TOWER			
07	WATER TOWER			
08	WATER TOWER			
09	WATER TOWER			
10	WATER TOWER			
11	WATER TOWER			
12	WATER TOWER			
13	WATER TOWER			
14	WATER TOWER			
15	WATER TOWER			
16	WATER TOWER			
17	WATER TOWER			
18	WATER TOWER			
19	WATER TOWER			
20	WATER TOWER			
21	WATER TOWER			
22	WATER TOWER			
23	WATER TOWER			
24	WATER TOWER			
25	WATER TOWER			
26	WATER TOWER			
27	WATER TOWER			
28	WATER TOWER			
29	WATER TOWER			
30	WATER TOWER			
31	WATER TOWER			
32	WATER TOWER			
33	WATER TOWER			
34	WATER TOWER			
35	WATER TOWER			

GENERAL LEGEND

---	FACILITY BOUNDARY
---	EXISTING FENCE
---	EXISTING DRAINAGE PARALLEL LINE
---	WATER LINE

NOTES

1. ALL SPECIAL FEATURES SHOWN AND DESCRIBED IN PLANS ARE TO BE CONTROLLED BY THE CONTRACTOR. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION AND MAINTENANCE OF ALL UTILITIES AND STRUCTURES SHOWN ON THE PLANS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION AND MAINTENANCE OF ALL UTILITIES AND STRUCTURES SHOWN ON THE PLANS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION AND MAINTENANCE OF ALL UTILITIES AND STRUCTURES SHOWN ON THE PLANS.
2. ELEVATION CONTROL IS BASED ON THE NORTH AMERICAN MEAN SEA LEVEL. ALL ELEVATIONS ARE EXPRESSED IN FEET AND DECIMALS THEREOF.
3. HORIZONTAL CONTROL IS BASED ON PLUMB LINE PLUMB COMPONENTS. ALL DISTANCES ARE EXPRESSED IN FEET AND DECIMALS THEREOF. ALL DISTANCES ARE EXPRESSED IN FEET AND DECIMALS THEREOF. ALL DISTANCES ARE EXPRESSED IN FEET AND DECIMALS THEREOF.

Stock Island River Plant
 Stock Island, FL
 LAT: 24° 33' 49" N
 LONG: 81° 44' 03" W
 Figure 1 & 2

NOT TO BE USED
FOR CONSTRUCTION

	BLACK & VEATCH CORPORATION ENGINEERS 1300 N. W. 10th St. Fort Lauderdale, FL 33304	STOCK ISLAND EXISTING FACILITIES	DRAWING NO. 136838-DS-0001 SHEET NO. 1
--	-----------------------------------------------------------------------------------------------------------	-------------------------------------	---------------------------------------------------------------

**Keys Energy Services – Stock Island Power Plant (0870003)
Identification of Applicable Requirements**

Facility Wide Applicable Requirements

Title V Conditions – Version dated June 23, 2006

40 CFR 68
62-4.040(1)(b)
62-213.420(4)
62-213.440
62-213.430(6)
62-213.900
62-296.320(1)(a)
62-296.320(2)
62-296.320(4)(b)1 & 4
62-296.320(4)(c)1, 2, 3, and 4
62-297.310(7)(b)

Applicable Requirements for EU 005 and EU 006 (Two Medium Speed Diesel Generators)

Best Available Control Technology (BACT) Determination dated 6/5/89

PSD-FL-135
AO44-207419
AC44-221256
AC44-152197
AC44-207419
62-4.070(3)
62-4.160(2)
62-210.200, F.A.C., Definitions - (PTE)
62-210.700(1) and (4)
62-212.400
62-213.440(1)
62-296.320(1)(a)2
62-297.310(2)
62-297.310(7)(a)3, 4, & 5

Applicable Requirements for EU 007 (23.5 MW Simple Cycle Combustion Turbine CT1)

NSPS - 40 CFR 60, Subpart GG
62-204.800(7)(b) 38.
NSPS - 40 CFR 60 Subpart A
40 CFR 60.332 and 333
PSD-FL-210
AC44-245399
The unit is not affected by the Acid Rain Program, since it meets the requirements of 40 CFR 72.7 by serving a generator with less than 25 MW
62-4.160(2)
62-210.200
62-210.300
62-212.400
62-212.500(56)

62-213.440(1)
62-297.310(8)

Applicable Requirements for EU 008 and 009 (19.77 MW Simple Cycle Combustion Turbines CT2 and CT3)

NSPS - 40 CFR 60, Subparts A and GG
40 CFR 60.332 and 333
AC0870003-003

The units are not affected by the Acid Rain Program, since they meet the requirements of 40 CFR 72.7 by serving a generator with less than 25 MW

62-204.800(7)(b)38.
62-212.400
62-297.310(8)

Applicable Requirements Common to EU 005, 006, 007, 008, and 009 (Two Medium Speed Diesel Generators, 23.5 MW Simple Cycle Combustion Turbine CT1, 19.77 MW Simple Cycle Combustion Turbines CT2 and CT3)

62-297.310(1), (3), and (4)
62-297.310(7)(b) and (c)

Applicable Requirements Common to EU 007, 008, and 009 (23.5 MW Simple Cycle Combustion Turbine CT1, 19.77 MW Simple Cycle Combustion Turbines CT2 and CT3)

AC44-245399
PSD-FL-210
0870003-003-AC
40 CFR 60.7(b), (c), (d), (e), and (f)
40 CFR 60.8(b), (c), (d), (e), and (f)
40 CFR 60.11(b), (d), and (g)
40 CFR 60.12
40 CFR 60.14(c), (e), (f), and (g)
40 CFR 60.334
40 CFR 60.334(a) and (b)
40 CFR 60.335
40 CFR 60.335(a)
40 CFR 60.335(b)(1)
40 CFR 60.335(c)
62-4.070(3)
62-210.700(6)
62-213.440(1)(b)2.b.
62-296.800
62-297.310

Applicable Requirements for EU 011 (48 MW Simple Cycle Combustion Turbine CT-4)

NSPS - 40 CFR 60, Subpart GG

NSPS - 40 CFR 60 Subpart A

40 CFR 60.40a(b)

40 CFR 60.7

40 CFR 60.8

PSD-FL-210

AC44-245399

40 CFR 75

The unit is affected by the Acid Rain Program, since it exceeds the requirements of 40 CFR 72.7 by serving a generator with greater than 25 MW 62-4.070

62-4.130

62-4.160(8)

62-4.160(14) and (15)

62-204.800

62-210.200

62-210.300

62-210.370(2)

62-210.650

62-210.700

62-210.700(1), (4), (5), and (6)

62-212.400

62-212.400(2)

62-213.440(1)(b)2

62-297.310(2) and (3)

62-297.310(4)(a)1 and 2

62-297.310(4)(b) and (d)

62-297.310(5)(a) and (b)

62-297.310(7)(a)

62-297.310(7)(a)3 and 4

62-297.310(7)(a)9.

62-297.310(7)(b)

62-297.310(8)

62-297.520

06/29/2007 13:43 9543554244

06/29/2007 11:46 9544624946

MARINE SALES

PAGE 01/01

PAGE 01/01

PAGE 01/01

INTERTEK CB

Intertek

Caleb Brett

Key West
Spec's

Coely

Report of Analysis

Vessel / Tank S/T 216
 Lab Ref No. PE2097 - 22001
 Terminal / Port TPSI (Coastal) North Terminal, PE
 Submitted by Personnel of TPSI Port Everglades
 Sample Designation Ultra Low Sulphur Diesel #ID Number US4002007001
 Date Sampled 25-Jun-07 Customer Ref No:
 Date Submitted 28-Jun-07 Date Tested 28-Jun-07
 Samples Tested Running

Method	Description	Results	Units
D4052	API Gravity @ 60 F	39.6	
D445	Viscosity @ 50 C	2.297	Cst
D8453-03a	Sulfur	4.1	ppm = 0.00041 %
D93 A	Flash Point	169	F
D240	Heat of Combustion, Gross	19,641	BTU/lb

ATTN: JAMES McCLENDON

(305) 295-1145

Fuel barge
Delivery date July 1, 2007

For Intertek Caleb Brett

Peter Sicard
Lab Manager

The information contained herein is based on laboratory tests and observations performed by Intertek Caleb Brett. The sample was submitted solely for testing.

Friday, June 29, 2007

1831 W State Rd. #4, Box 105, Ft Lauderdale, Florida, 33315

Page 1 of 1

DESK COPY

**Keys Energy Services
STOCK ISLAND POWER PLANT
Medium Speed Diesel Units (005 & 006)**

PROCESS FLOW DIAGRAM

STOCK ISLAND MEDIUM SPEED DIESEL UNITS 1 & 2

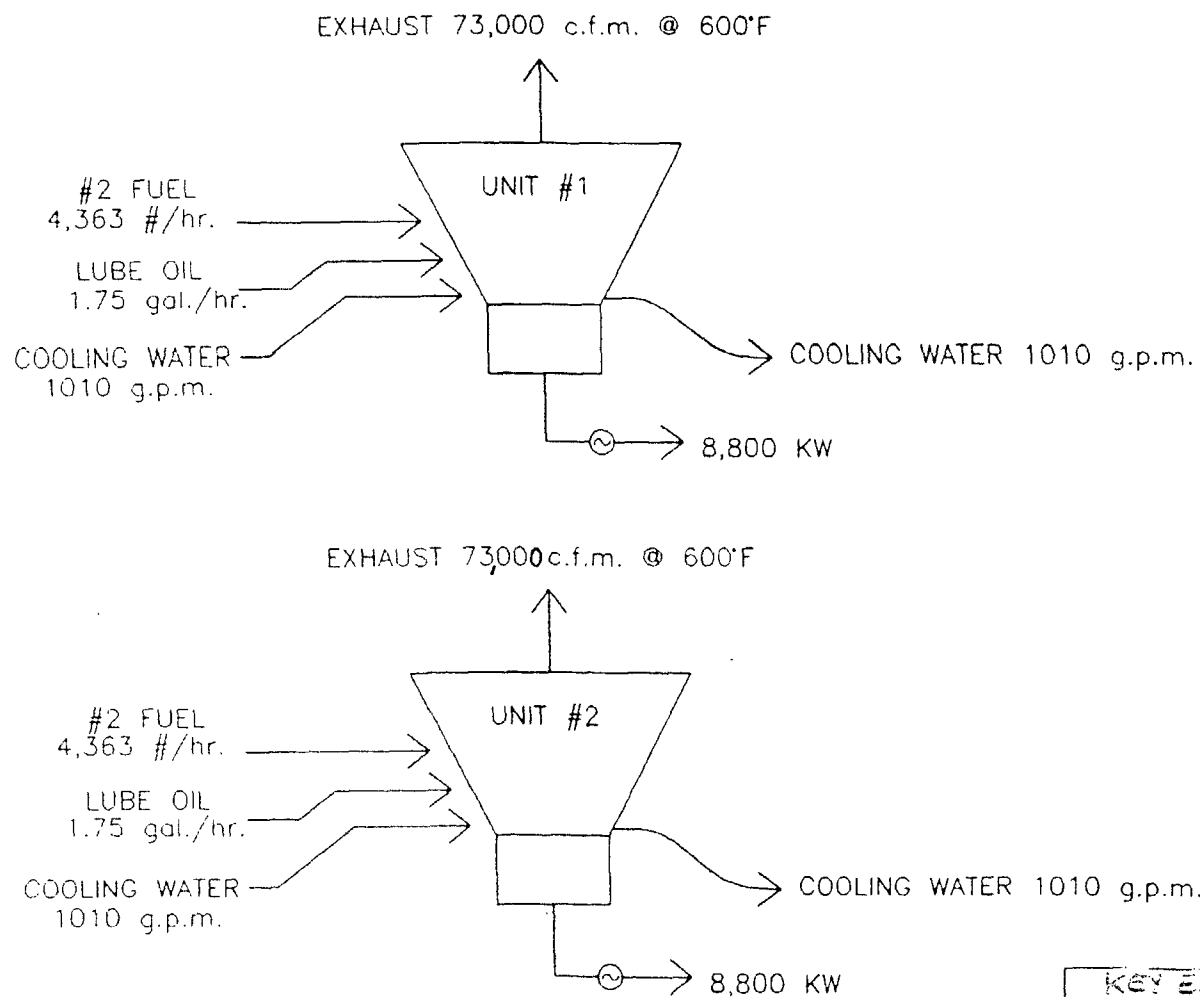


Figure 5

KEY ENERGY SERVICES
KEY WEST, FLORIDA
DATE: 5-15-95

06/29/2007 13:43

9543554244

PIPELINE SALES

PAGE 01/01

06/29/2007 11:46

9544624346

INTERTEK CB

PAGE 01/01

PAGE 01/01

Intertek

Caleb Brett

Key West
Spec's

Caey

Report of Analysis

Vessel / Tank S/T 216
 Lab Ref No. PE2007 - 22001
 Terminal / Port TPSI (Coastal) North Terminal, PE
 Submitted by Personnel of TPSI Port Everglades
 Sample Designation Ultra Low Sulphur Diesel WFO Number US4002007001
 Date Sampled 25-Jun-07 Customer Ref No:
 Date Submitted 28-Jun-07 Date Tested 28-Jun-07
 Samples Tested Running

Method	Description	Results	Units
D4052	API Gravity @ 60 F	32.5	
D445	Viscosity @ 50 C	2.237	Cst
D8453-03a	Sulfur	4.1	ppm = 0.00041 %
D93 A	Flash Point	189	F
D240	Heat of Combustion, Gross	19,641	BTU/lb

ATTN: JAMES McCLENDON
 (305) 295-1145

Fuel barge
 Delivery date July 1, 2007

For Intertek Caleb Brett

Peter Sicard
Lab Manager

The information contained herein is based on laboratory tests and observations performed by Intertek Caleb Brett. The sample was submitted solely for testing.

Friday, June 29, 2007

1882 W State Rd 84, Box 105, Ft Lauderdale, Florida, 33315

Page 1 of 1

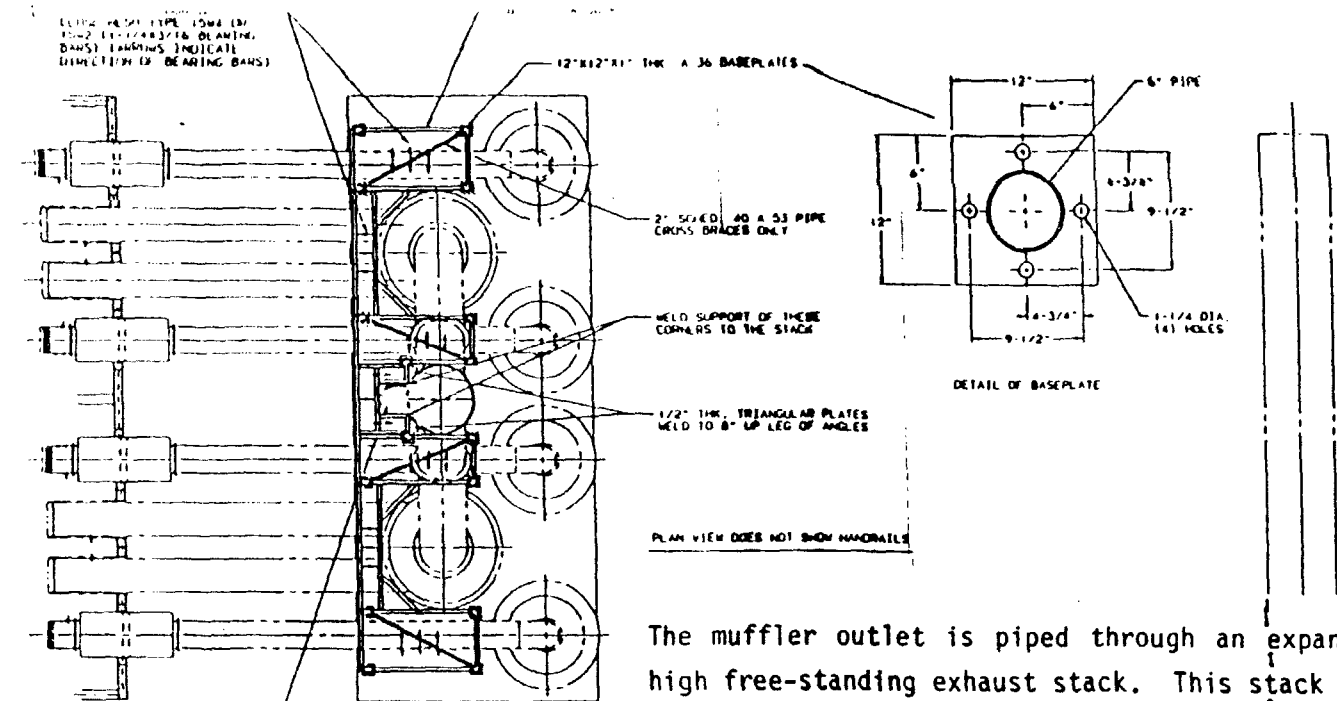
Keys Energy Services
STOCK ISLAND POWER PLANT
Detailed Description of Control Equipment

The air pollution control associated with the MSD'S consists of ignition timing retard for NOx emissions reduction. Design details are unavailable. The manufacturer's guarantee for NOx emissions for each unit is 6 grams/hp-hr. This level is sufficient to meet current NOx permit limitations.

Attachment - C

M...

ATTACHMENT - D
MSD Stack Sampling
Facility



LEAK TEST TYPE 15WA (BY 15-2 11/22/48/3/16 CLEANING BANDS) DRAWING INDICATE DIRECTION OF BEARING BANDS

12"x12"x1/2" THK. A 36 BASEPLATES

2" SCHED. 40 A 53 PIPE CROSS BRACES ONLY

WELD SUPPORT OF THESE CORNERS TO THE STACK

1/2" THK. TRIANGULAR PLATES WELD TO 8" UP LEG OF ANGLES

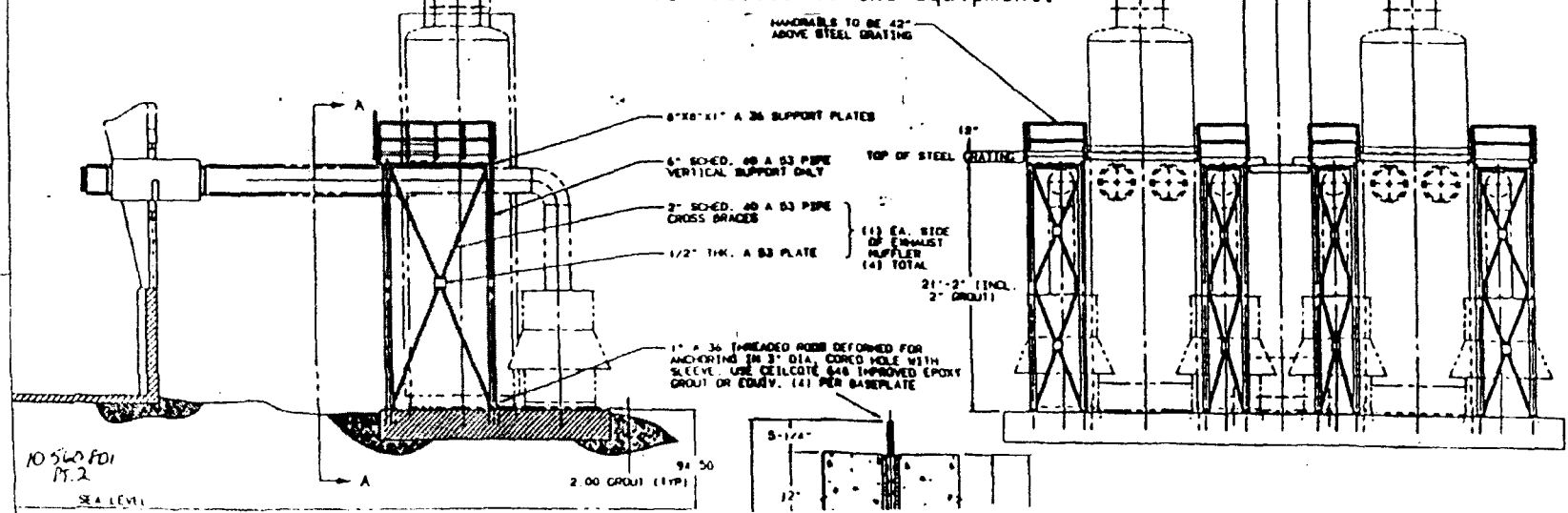
DETAIL OF BASEPLATE

PLAN VIEW DOES NOT SHOW HORIZONTALS

LINER AND SAFETY CAGE FURNISHED WITH STACK MODIFY TO SUIT THIS INSTALLATION

The muffler outlet is piped through an expansion joint into the 100 ft. high free-standing exhaust stack. This stack has a vertical splatter plate in the middle and upper sections and both engines exhaust into it, thus the gas is ducted to atmosphere in separate pipe sections.

Exhaust emissions are monitored/sampled in the outlet tube inside the exhaust muffler and a maintenance platform/ladder arrangement is provided for access to the equipment.



HORIZONTALS TO BE 42" ABOVE STEEL GRATING

8"x8"x1/2" A 36 SUPPORT PLATES

6" SCHED. 40 A 53 PIPE VERTICAL SUPPORT ONLY

2" SCHED. 40 A 53 PIPE CROSS BRACES

1/2" THK. A 53 PLATE

TOP OF STEEL GRATING

(1) EA. SIDE OF EXHAUST MUFFLER (4) TOTAL

21'-2" (INCL. 2" GROUT)

1" A 36 THREADED RODS DEFORMED FOR ANCHORING IN 3" DIA. CORED HOLE WITH SLEEVE. USE EPOXY GROUT OR EQUIV. (4) PER BASEPLATE

10 560 FDI
PT. 2
SEA LEVEL

94.50
2.00 GROUT (17P)



**Keys Energy Services
STOCK ISLAND POWER PLANT
Procedures for Startup and Shutdown**

The medium speed diesel units are brought to load and put online as fast as possible in accordance with manufacturer instructions to minimize opacity emissions. Typically the units are online within 12 mins.

Attachment - E

Keys Energy Services
STOCK ISLAND POWER PLANT
List of Applicable Regulations

MSD Units 005 & 006

Regulation

62-4.001 through 62-4.160, FAC -Permits Part I General
62-4.210, FAC -Construction Permits
62-4.220, FAC -Operation Permit for New Sources
62-210, FAC -Stationary Sources – General Requirements
62-212.400, F AC -Prevention of Significant Deterioration (PSD)
40CFR 70 -State Operating Permits
62-204.240, F AC -Ambient Air Quality Standards
62-296.320(4)(b), F AC -General Visible Emission Standards
62-296.320(2), FAC -General Pollutant Emission Limiting Standards, Objectionable Odor Prohibited
62-297.310, FAC -General Compliance Test Requirements
62-297.620, F AC -Exceptions and Approval of Alternative Procedures and Requirements
62-296.320(4)(c), FAC -Unconfined Emissions of Particulate Matter
40CFR 72.1 thru 72.7 -Acid Rain Prog. Gen. Provisions (except Retired units exempt. & Std Requirements)
40CFR72.10 thru 72.13 -Acid Rain Prog Gen. Provisions (except Retired units exempt. & Std Requirements)
62-297.401, FAC -Compliance Test Methods
62-213, FAC – Operation Permits for Major Sources of Air Pollution (Title V)

DESK COPY

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combustion Turbine Unit #1 (007)**

PROCESS FLOW DIAGRAM

STOCK ISLAND COMBUSTION TURBINE #1

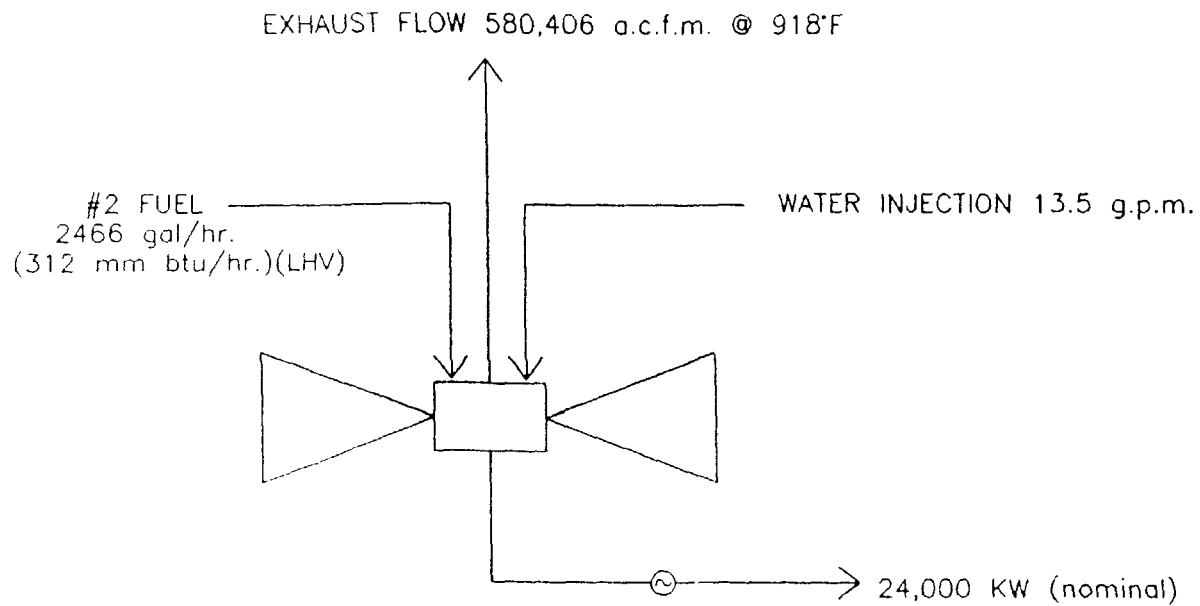


Figure 6

06/29/2007 13:43 9543554244

MARINE SALES

PAGE 01/01

06/29/2007 11:46 9544624346

INTERTEK CB

PAGE 01/01
PAGE 01/01

Intertek Caleb Brett

Key West
Spec's

Goey

Report of Analysis

Vessel / Tank S/T 216
 Lab Ref No. PE2097 - 22001
 Terminal / Port TPST (Coastal) North Terminal, PE
 Submitted by Personnel of TPST Port Everglades
 Sample Designation Ultra Low Sulphur Diesel WFO Number US4802007001
 Date Sampled 25-Jun-07 Customer Ref No.
 Date Submitted 28-Jun-07 Date Tested 28-Jun-07
 Samples Tested Running

Method	Description	Results	Units
D4052	API Gravity @ 60 F	34.8	
DM45	Viscosity @ 50 C	2.237	Cst
DS453-03a	Sulfur	4.1	ppm = 0.00041 %
D93A	Flash Point	109	F
D240	Heat of Combustion, Gross	19,641	BTU/lb

ATTN: JAMES McCLENDON
(305) 295-1145

Fuel barge
Delivery date July 1, 2007

For Intertek Caleb Brett

Peter Sicard
Lab Manager

The information contained herein is based on laboratory tests and observations performed by Intertek Caleb Brett. The sample was submitted solely for testing.

Friday, June 29, 2007

1882 W State Rd 84, Bldg 105, Ft Lauderdale, Florida, 33315

Page 1 of 1

DETAILED DESCRIPTION OF CONTROL EQUIPMENT
Emission Units 007, 008 and 009

The air pollution control associated with the combustion turbines consisting of water injection for NO_x emissions reduction. Design details and manufacturer guarantees for control efficiency for the water injection system are unavailable due to the age of the used equipment at the time of installation at the Stock Island Power Plant. The control efficiency of the water injection system is sufficient for the gas turbines to meet the applicable NO_x emissions limitations.

Attachment - C

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combusting Turbines
Stack Sampling Facilities**

A single port is located on the side of the gas turbine stack and is accessible from the top of the unit enclosure.

Attachment - D

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combustion Turbines
Procedures for startup and shutdown**

The combustion turbines are brought to load and put online as fast as possible in accordance with manufactures instructions to minimize opacity emissions. Typically the units are online within 14 mins.

Attachment - E

Keys Energy Services
STOCK ISLAND POWER PLANT
List of Applicable Regulations

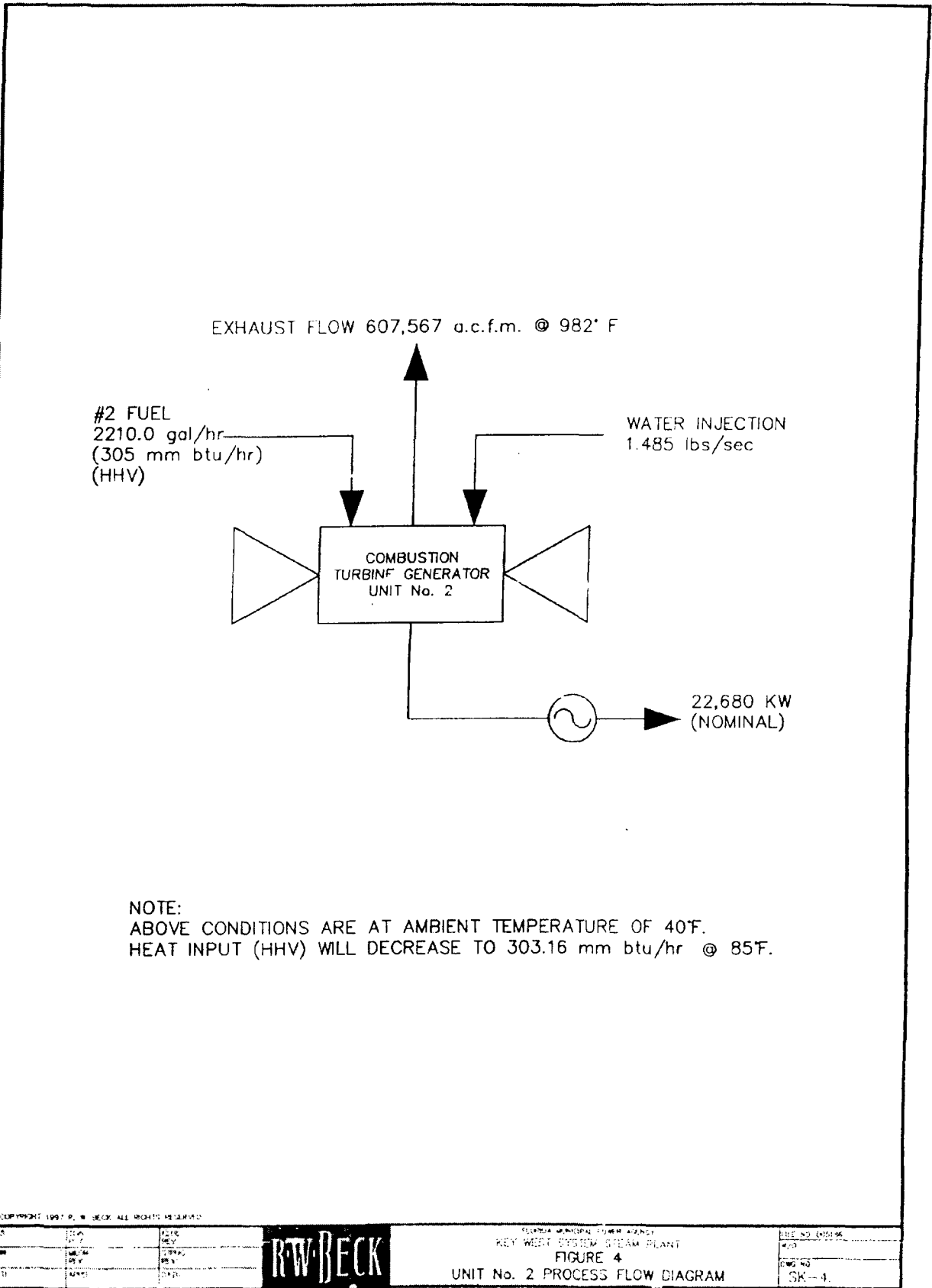
CT Unit 007

Regulation

40CFR70 -State Operating Permits
40CFR60.7 -Notification and Recordkeeping (NSPS)
40CFR60.8 -Performance Tests (NSPS)
40CFR60.11 -Compliance with Standards and Maintenance Requirements (NSPS)
40CFR60.12 -Circumvention (NSPS)
40CFR60.13 -Monitoring Requirements (NSPS)
40CFR60.19 -General Notification and Reporting Requirements (NSPS)
40CFR60, Subpart GG -Standards of Performance for Stationary Gas Turbines (NSPS)
62-4.001 through 62-4.160, FAC -Permits Part I General
62-220, FAC -Operation Permit for New Sources
62-210, F AC -Stationary Sources – General Requirements
62-212.400, F AC -Prevention of Significant Deterioration (PSD)
62-4.210, FAC -Construction Permits
62-213, FAC -Operation Permits for Major Sources of Air Pollution (Title V)
62-204.240, FAC -Ambient Air Quality Standards
62-296.320(4)(b), FAC -General Visible Emission Standard
62-296.320(2), FAC -General Pollutant Emission Limiting Standards, Objectionable Odor Prohibited
62-297.310, FAC -General Compliance Test Requirements
62-297.620, FAC -Exceptions and Approval of Alternative Procedures and Requirements
62-296.320(4)(c), FAC -Unconfined Emissions of Particulate Matter
62-297.401, F AC -Compliance Test Methods

DESK COPY

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combustion Turbine Unit #2 (008)**



NOTE:
ABOVE CONDITIONS ARE AT AMBIENT TEMPERATURE OF 40°F.
HEAT INPUT (HHV) WILL DECREASE TO 303.16 mm btu/hr @ 85°F.

24.1.2.2 (Rev. 08/84) 8-12-87 © 1111

06/29/2007 13:43 9543554244

PAGE 01/01
PAGE 01/01

06/29/2007 11:46 9544624346

INTERTEK CB

Intertek Caleb Brett

Key West
Spec's

Gary

Report of Analysis

Vessel / Tank: S/T 216
 Lab Ref No.: PE2007 - 22001
 Terminal / Port: TPPI (Coastal) North Terminal, PE
 Submitted by: Personnel of TPPI Port Everglades
 Sample Designation: Ultra Low Sulphur Diesel WFO Number: US4002007001
 Date Sampled: 25-Jun-07 Customer Ref No.:
 Date Submitted: 28-Jun-07 Date Tested: 28-Jun-07
 Samples Tested: Rimming

Method	Description	Results	Units
D4052	API Gravity @ 60 F	33.5	
D445	Viscosity @ 50 C	2.257	Cst
D5453-03a	Sulfur	6.1	ppm = 0.00041 %
D93A	Flash Point	109	F
D240	Heat of Combustion, Gross	19,441	BTU/lb

ATTN: JAMES McCLENDON

(305) 295-1145

Fuel barge
Delivery date July 1, 2007

Car Intertek Caleb Brett

Peter Sicaud
Lab Manager

The information contained herein is based on laboratory tests and observations performed by Intertek Caleb Brett. The sample was submitted solely for testing.

DETAILED DESCRIPTION OF CONTROL EQUIPMENT
Emission Units 007, 008 and 009

The air pollution control associated with the combustion turbines consisting of water injection for NO_x emissions reduction. Design details and manufacturer guarantees for control efficiency for the water injection system are unavailable due to the age of the used equipment at the time of installation at the Stock Island Power Plant. The control efficiency of the water injection system is sufficient for the gas turbines to meet the applicable NO_x emissions limitations.

Attachment - C

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combusting Turbines
Stack Sampling Facilities**

A single port is located on the side of the gas turbine stack and is accessible from the top of the unit enclosure.

Attachment - D

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combustion Turbines
Procedures for startup and shutdown**

The combustion turbines are brought to load and put online as fast as possible in accordance with manufactures instructions to minimize opacity emissions. Typically the units are online within 14 mins.

Attachment - E

Keys Energy Services
STOCK ISLAND POWER PLANT
List of Applicable Regulations

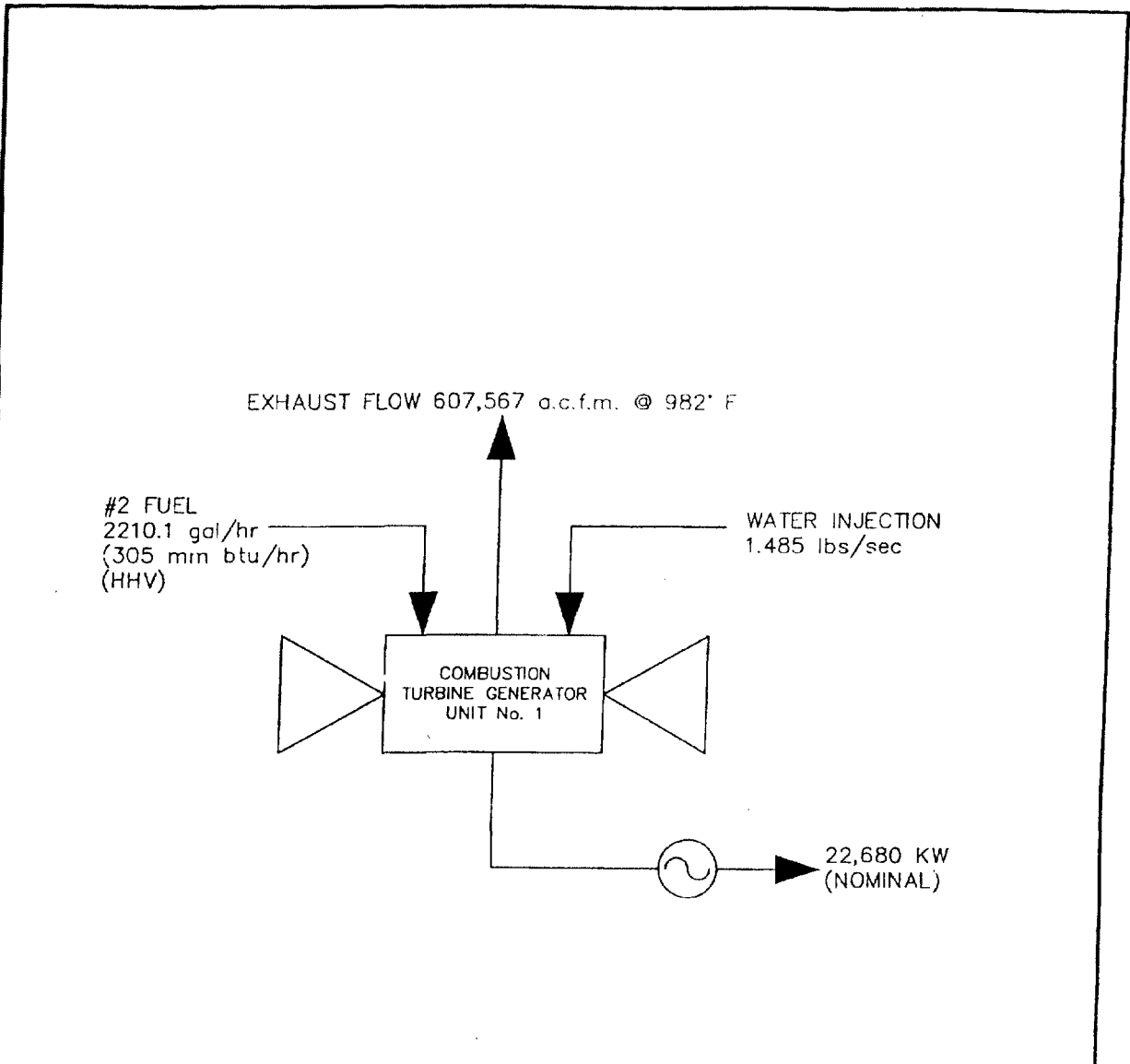
CT Units 008 & 009

Regulation

40 CFR 70 -State Operating Permits
40 CFR 60.7 -Notification and Recordkeeping (NSPS)
40 CFR 60.8 -Performance Tests (NSPS)
40 CFR 60.11 -Compliance with Standards and Maintenance Requirements (NSPS)
40 CFR 60.12 -Circumvention (NSPS)
40 CFR 60.13 -Monitoring Requirements (NSPS)
40 CFR 60.19 -General Notification and Reporting Requirements (NSPS)
40 CFR 60, Subpart GG -Standards of Performance for Stationary Gas Turbines (NSPS)
62-4.001 through 62-4.160, FAC -Permits Part I General
62-4.210, FAC -Construction Permits
62-4.220, FAC -Operation Permit for new Sources
62-210, FAC -Stationary Sources – General Requirements
62-213, FAC -Operation Permits for Major Sources of Air Pollution (Title V)
62-204.240, FAC -Ambient Air Quality Standards
62-296.320(4)(b), FAC -General Visible Emission Standards
62-296.320(2), FAC -General Pollutant Emission Limiting Standards, Objectionable Odor Prohibited
62-297.310, FAC -General Compliance Test Requirements
62-297.620, FAC -Exceptions and Approvals of Alternative Procedures and Requirements
62-296.320(4)(c), FAC -Unconfined Emissions of Particulate Matter
62-297.401, FAC -Compliance Test Methods
62-212.400, FAC – Prevention of Significant Deterioration (PSD)

DESK COPY

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combustion Turbine Unit #3 (009)**



NOTE:
 ABOVE CONDITIONS ARE AT AMBIENT TEMPERATURE OF 40°F.
 HEAT INPUT (HHV) WILL DECREASE TO 303.16 mm btu/hr @ 85°F.

FILE NO. 1001001-1001001 8-12-87 @ 11:14

COPYRIGHT © 1977 R. W. BECK. ALL RIGHTS RESERVED.			FLORIDA MUNICIPAL POWER AGENCY RED WEST SYSTEM STEAM PLANT		FILE NO. 1001001-1001001 8-12-87
DES	DATE	REV	DES	DATE	REV
CHK	APPR	DATE	CHK	APPR	DATE
			UNIT No. 3 PROCESS FLOW DIAGRAM		FIGURE 3 SK-3.

06/29/2007 13:43 9543554244

PAGE 01/01
PAGE 01/01

06/29/2007 11:45 9544624346

INTERTEK CB

Intertek

Caleb Brett

Key West
Spec's

Goey

Report of Analysis


Vessel / Tank S/T 216
 Lab Ref No. PE2097 - 22081
 Terminal / Port TPSI (Central) North Terminal, PE
 Submitted by Personnel of TPSI Port Everglades
 Sample Designation Ultra Low Sulphur Diesel MID Number US4002007001
 Date Sampled 25-Jun-07 Customer Ref No:
 Date Submitted 28-Jun-07 Date Tested 28-Jun-07
 Samples Tested Running

Method	Description	Results	Units
D4052	API Gravity @ 60 F	39.6	
D445	Viscosity @ 50 C	2.237	CP
D5453-03a	Sulfur	4.1	ppm = 2.00041 %
D93A	Flash Point	169	F
D240	Heat of Combustion, Gross	19,641	BTU/lb

ATTN: JAMES McCLENDON

(305) 295-1145

Fuel barge
Delivery date July 1, 2007


 For Intertek Caleb Brett
 Peter Sicard
 Lab Manager

The information contained herein is based on laboratory tests and observations performed by Intertek Caleb Brett. The sample was submitted solely for testing.

DETAILED DESCRIPTION OF CONTROL EQUIPMENT
Emission Units 007, 008 and 009

The air pollution control associated with the combustion turbines consisting of water injection for NO_x emissions reduction. Design details and manufacturer guarantees for control efficiency for the water injection system are unavailable due to the age of the used equipment at the time of installation at the Stock Island Power Plant. The control efficiency of the water injection system is sufficient for the gas turbines to meet the applicable NO_x emissions limitations.

Attachment - C

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combusting Turbines
Stack Sampling Facilities**

A single port is located on the side of the gas turbine stack and is accessible from the top of the unit enclosure.

Attachment - D

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combustion Turbines
Procedures for startup and shutdown**

The combustion turbines are brought to load and put online as fast as possible in accordance with manufactures instructions to minimize opacity emissions. Typically the units are online within 14 mins.

Attachment - E

Keys Energy Services
STOCK ISLAND POWER PLANT
List of Applicable Regulations

CT Units 008 & 009

Regulation

40 CFR 70 -State Operating Permits
40 CFR 60.7 -Notification and Recordkeeping (NSPS)
40 CFR 60.8 -Performance Tests (NSPS)
40 CFR 60.11 -Compliance with Standards and Maintenance Requirements (NSPS)
40 CFR 60.12 -Circumvention (NSPS)
40 CFR 60.13 -Monitoring Requirements (NSPS)
40 CFR 60.19 -General Notification and Reporting Requirements (NSPS)
40 CFR 60, Subpart GG -Standards of Performance for Stationary Gas Turbines (NSPS)
62-4.001 through 62-4.160, F AC -Permits Part I General
62-4.210, FAC -Construction Permits
62-4.220, FAC -Operation Permit for new Sources
62-210, FAC -Stationary Sources – General Requirements
62-213, FAC -Operation Permits for Major Sources of Air Pollution (Title V)
62-204.240, FAC -Ambient Air Quality Standards
62-296.320(4)(b), FAC -General Visible Emission Standards
62-296.320(2), FAC -General Pollutant Emission Limiting Standards, Objectionable Odor Prohibited
62-297.310, FAC -General Compliance Test Requirements
62-297.620, FAC -Exceptions and Approvals of Alternative Procedures and Requirements
62-296.320(4)(c), FAC -Unconfined Emissions of Particulate Matter
62-297.401, FAC -Compliance Test Methods
62-212.400, FAC – Prevention of Significant Deterioration (PSD)

DESK COPY

**Keys Energy Services
STOCK ISLAND POWER PLANT
High Speed Diesel Units #1, #2, #3 (010)**

PROCESS FLOW DIAGRAM

STOCK ISLAND HIGH SPEED DIESEL UNITS 1, 2 & 3.

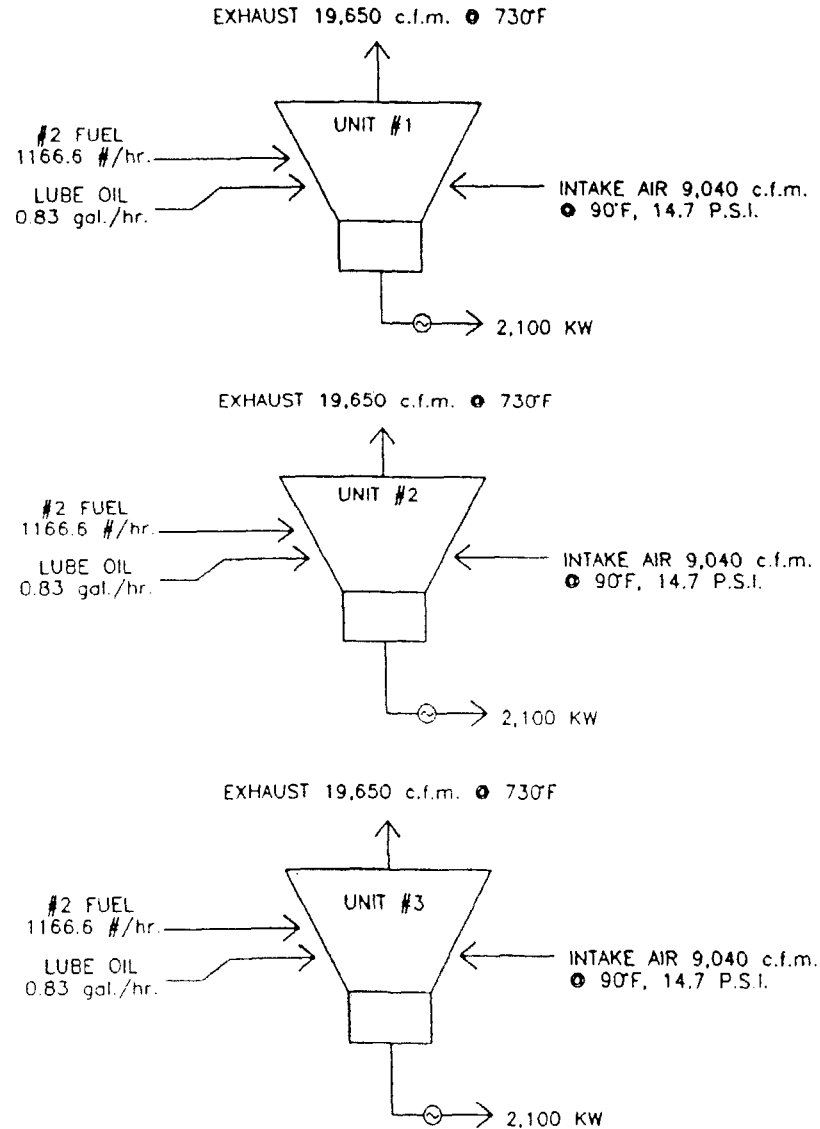


Figure 4

CITY ELECTRIC SYSTEM
KEY WEST, FLORIDA
DATE: 5-15-95

06/29/2007 13:43 9543554244

06/29/2007 11:45 9544624346

MARINE SALES

PAGE 01/01

PAGE 01/01
PAGE 01/01

INTERTEK CB

Intertek Caleb Brett

Key West
Spec's

Gary

Report of Analysis

Vessel / Tank S/T 216
 Lab Ref No. PE2007 - 22001
 Terminal / Port TPST (Coastal) North Terminal, PE
 Submitted by Personnel of TPST Port Everglades
 Sample Designation Ultra Low Sulphur Diesel WO Number US4002007001
 Date Sampled 25-Jun-07 Customer Ref No:
 Date Submitted 28-Jun-07 Date Tested 28-Jun-07
 Samples Tested Running

Method	Description	Results	Units
D4052	API Gravity @ 60 F	33.5	
D445	Viscosity @ 50 C	2.237	Cst
D5453-03a	Sulfur	4.1	ppm = 0.00041 %
D93A	Flash Point	169	F
Q240	Heat of Combustion, Gross	19,441	BTU/lb

ATTN: JAMES McCLENDON

(305) 295-1145

Fuel barge

Delivery date July 1, 2007

For Intertek Caleb Brett

Peter Sicard
Lab Manager

The information contained herein is based on laboratory tests and observations performed by Intertek Caleb Brett. The sample was submitted solely for testing.

Friday, June 29, 2007

1802 W Sunrise Rd #4, Bay 105, Ft Lauderdale, Florida, 33315

Page 1 of 1

**Keys Energy Services
STOCK ISALND POWER PLANT
High Speed Diesels
Procedures for Startup and Shutdown**

The diesel units are brought to load and put online as fast as possible (10 min maximum) in accordance with manufacturer instructions to minimize opacity emissions.

Keys Energy Services
STOCK ISLAND POWER PLANT
List of Applicable Regulations

HSD Units 010

Regulation

40CFR 70 -State Operating Permits

62-210, F AC -Stationary Sources – General Requirements, except 62-210.550, F AC -Stack Height

62-213, FAC -Operation Permits for Major Sources of Air Pollution (Title V)

62-272.300, FAC -Ambient Air Quality Standards

62-297.310 General Compliance Test Requirements

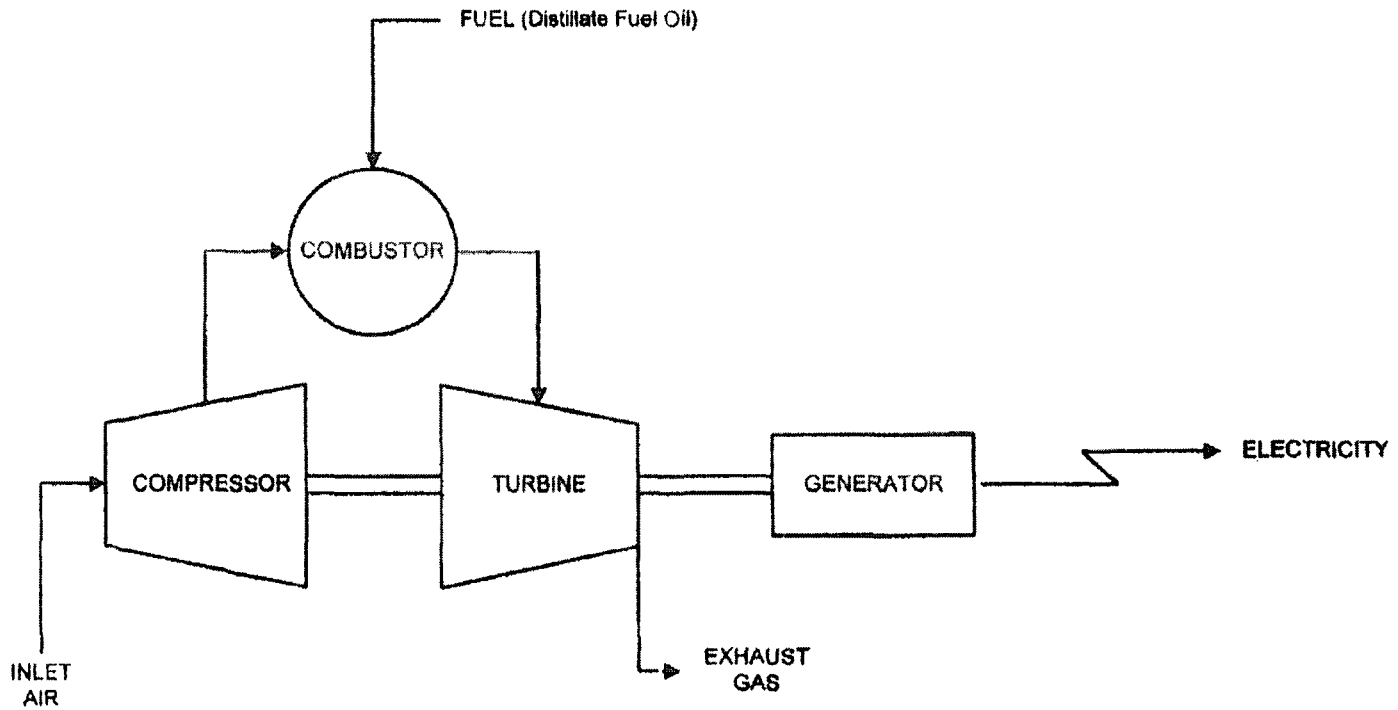
62-296.320 General Pollutant Emission Limiting Standards

**Keys Energy Services
STOCK ISLAND POWER PLANT
Combustion Turbine Unit #4 (011)**

Attachment B

Process Flow Diagrams

Keys Energy Services
Stock Island Power Plant
Combustion Turbine Unit 4



Simple Cycle Combustion Turbine
Process Flow Diagram

Attachment K

Detailed Description of Control Equipment

Detailed Description of Control Equipment

Water Injection: A control technology used to limit NO_x emissions. The thermal NO_x contribution to total NO_x emissions is reduced by lowering the combustion temperature through the use of water injection in the combustion zones of the combustion turbine.

Attachment L

Procedures for Startup and Shutdown

Procedures for Startup and Shutdown

Procedures for startup and shutdown will be completed in accordance with manufacturers' operating procedures and/or plant operating procedures.

Attachment M

Operation and Maintenance Plan

Operation and Maintenance Plan

The emission units will be operated and maintained in accordance with manufacturer's recommendations, operations and maintenance experience, and technical guidance taking into account protection of equipment, safety of personnel and other factors as deemed necessary to maintain compliance with the permitted limits.

Attachment E

Rule Applicability Analysis

Rule Applicability Analysis

Rule Applicability Analysis for the Entire Facility

State: Rule 62-4.070 – Standards for Issuing or Denying Permits.

State: Rule 62-210.300 – Permits Required.

State: Rule 62-212.300 – General Preconstruction Review Requirements.

State: Rule 62-212.400 – Prevention of Significant Deterioration.

Rule Applicability Analysis for the GE LM6000 Simple Cycle Combustion Turbine

The following rules are applicable to Combustion Turbine Unit 4:

Federal: 40 CFR Part 60 Subpart GG – Standards of Performance for Stationary Gas Turbines

Federal: 40 CFR Part 60 Subpart A – General Provisions.

Federal: 40 CFR Part 72 – Permits Regulation (Acid Rain)

Federal: 40 CFR Part 75 – Continuous Emissions Monitoring

State: Rule 62-204.800(8)(b).39 – 40 CFR Part 60 Subpart GG – Standards of Performance for Stationary Gas Turbines adopted by reference.

State: Rule 62-204.800(8)(d) – General Provisions Adopted – 40 CFR 60 Subpart A – General Provisions adopted by reference, with exceptions.

State: Rule 62-212.400 – Prevention of Significant Deterioration applies to NO_x, SO₂, PM, PM₁₀ and sulfuric acid mist. See the technical support document accompanying this application for a more detailed discussion of PSD applicability.

State: Rule 62-212.300 – General Preconstruction Review Requirements. Applies to CO, VOC and HAP emissions.

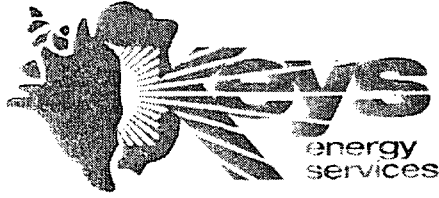
State: Rule 62-297.310 – General Compliance Test Requirements.

Rule Applicability Analysis for the One Million Gallon No. 2 Fuel Oil Storage Tank

Federal: 40 CFR Part 60 Subpart Kb, AS REVISED OCTOBER 15, 2003 – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23,

1984. Because the vapor pressure of No. 2 fuel oil is less than 3.5 kPa, this storage tank is not subject to 40 CFR Part 60 Subpart Kb.

State: Rule 62-212.300 – General Preconstruction Review Requirements. Per 62-210(3), F.A.C., this emissions unit is exempt from the permitting requirements of Chapter 62-212, F.A.C. because it satisfies the applicable criteria of paragraph 62-210.300(3)(b)1., F.A.C.



(305) 295-1000
1001 James Street
PO Box 6100
Key West, FL 33041-6100
www.KeysEnergy.com

UTILITY BOARD OF THE CITY OF KEY WEST

July 21, 2009

Florida Department of Environmental Protection
Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Acid Rain Part Application

To Whom It May Concern:

Enclosed you will find the "Acid Rain Part Application" form required per our Title V permit renewal instruction (0870003-008-AV) for Keys Energy Services located at 6900 Front Street Extended, Key West, FL 33040.

Please contact me at (305) 295-1134 if more information is needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Garcia", is written over a light blue horizontal line.

Edward Garcia
Director of Generation
Edward.Garcia@Keysenergy.com

c:
L. Tejada, General Manager & CEO
J. Wetzler, Asst. Gen Manager & CFO
A. Deese, FMPA
FILE: SOF-110

Enclosures

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

Plant name Stock Island Power Plant	State FL	6584 ORIS/Plant Code
--------------------------------------------	-----------------	--------------------------------

STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO₂ Opt-in unit, enter "yes" in column "b".

For new units or SO₂ Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO ₂ Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO ₂ Opt-in Units Commence Operation Date	New or SO ₂ Opt-in Units Monitor Certification Deadline
1	No	Yes	Retired	Retired
CT4	No	Yes	06/28/2006	12/25/2006
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		

Stock Island Power Plant

Plant Name (from STEP 1)

STEP 3

Read the standard requirements.

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part.
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP, and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
- (4) For applications including a SO₂ Opt-in unit, a monitoring plan for each SO₂ Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO₂ Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2), or
 - (ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program, and,

Stock Island Power Plant Plant Name (from STEP 1)

**STEP 3,
Continued.**

Recordkeeping and Reporting Requirements (cont)

- (iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

STEP 4

For SO₂ Opt-in units only.

In column "f" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" of STEP 2.

For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration.

In column "h" enter the hours.

f	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six months preceding initial application

Stock Island Power Plant
Plant Name (from STEP 1)

STEP 5

For SO₂ Opt-in units only.
(Not required for SO₂ Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO ₂ Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO ₂ Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO ₂ Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO ₂ Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)

STEP 6

For SO₂ Opt-in units only.


Attach additional requirements, certify and sign.

- A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
- B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
- C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
- D. Attach a complete compliance plan for SO₂ under 40 CFR 72.40.
- E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
- F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

Signature	Date
-----------	------

STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)	
I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.	
Name Edward Garcia	Title Director of Generation
Owner Company Name Keys Energy Services	
Phone 305-295-1134	E-mail address Edward.garcia@keysenergy.com
Signature 	Date 1/24/09

Acid Rain Program

Instructions for

Acid Rain Part Application

(40 CFR 72.30 - 72.31, and 74; and Rule 62-214.320, F.A.C.)

The Acid Rain Program requires the designated representative to submit an Acid Rain Part application for each source with an Acid Rain unit. A complete Certificate of Representation must be received by EPA before the Acid Rain Part application is submitted to the DEP Bureau of Air Regulation. A complete Acid Rain Part application, once submitted, is binding on the owners and operators of the Acid Rain source and is enforceable in the absence of an Acid Rain Part until the DEP Bureau of Air Regulation either issues an Acid Rain Part to the source or disapproves the application.

DEFINITIONS

"Act" – The federal Clean Air Act:

"CFR" - Code of Federal Regulations

"DOE" – U.S. Department of Energy

"EIA" – U.S. Energy Information Agency

"F.A.C." - Florida Administrative Code

"DEP" - Florida Department of Environmental Protection

"lbs" - pounds

"mmBtu" – million British thermal units

"NO_x" – Nitrogen oxides

"SO₂ Opt-in unit" - A combustion unit that has elected to become an affected unit under the Acid Rain Program.

For the purposes of applying 40 CFR Parts 72, 73, 75, 77, and 78, and

Chapter 62-214, F.A.C., each SO₂ Opt-in unit shall be treated as an Acid Rain unit.

"ORIS" - Office of Regulatory Information Systems

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the DEP Bureau of Air Regulation at (850) 488-0114.

STEP 1 Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4-digit number assigned by the EIA at the DOE to power plants owned by utilities. If the plant is not owned by a utility but has a 5-digit plant code (also assigned by EIA), use the plant code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 586-2402.

STEP 2 For column "a," identify each Acid Rain unit at the Acid Rain source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation and with unit identification numbers used in reporting to the DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements. If the unit is a SO₂ Opt-in unit, or electing to become one, enter "yes" in column "b." For columns "d" and "e," enter the commence operation date(s) and monitor certification deadline(s) for new units in accordance with 40 CFR 72.2 and 75.4, respectively.

STEP 3 Read the standard requirements.

STEP 4 For SO₂ Opt-in units only. In column "f" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" of STEP 2. For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration. If not a renewal application, in column "h" enter the number of hours each unit operated in the six months preceding initial application and attach supporting documentation.

STEP 5 For SO₂ Opt-in units only. (Not required for renewal applications.) In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f"). For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

- STEP 6 For SO₂ Opt-in units only.** Complete the additional requirements A - F. The designated representative or alternate designated representative must read the certification statement, sign and date.
The Administrator shall be responsible for the following activities under the opt-in provisions of the Acid Rain Program:
- (1) Calculating the baseline or alternative baseline and allowance allocation, and allocating allowances for combustion or process sources that become affected units under 40 CFR Part 74;
 - (2) Certifying or recertifying monitoring systems for combustion or process sources as provided under 40 CFR 74.20;
 - (3) Establishing allowance accounts, tracking allowances, assessing end-of-year compliance, determining reduced utilization, approving thermal energy transfer and accounting for the replacement of thermal energy, closing accounts for opt-in sources that shut down, are reconstructed, become affected under 40 CFR 72.6, or fail to renew their opt-in permit, and deducting allowances as provided under 40 CFR Part 74, Subpart E; and
 - (4) Ensuring that the opt-in source meets all withdrawal conditions prior to withdrawal from the Acid Rain Program as provided under 40 CFR 74.18; and
 - (5) Approving and disapproving the request to withdraw from the Acid Rain Program.
- The DEP shall be responsible for the following activities:**
- (1) Issuing the draft and final opt-in permit;
 - (2) Revising and renewing the opt-in permit; and
 - (3) Terminating the opt-in permit for an opt-in source as provided in 40 CFR 74.18 (withdrawal), 40 CFR 74.46 (shutdown, reconstruction or change in affected status) and 40 CFR 74.50 (deducting allowances).

STEP 7 The designated representative or alternate designated representative must read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign and date.

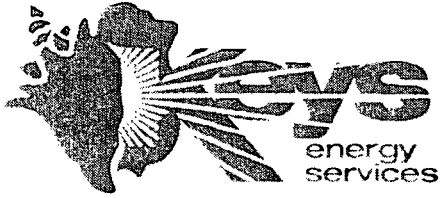
Submission Deadlines

For new units, an initial Acid Rain Part application must be submitted to the DEP Bureau of Air Regulation 24 months before the date the unit commences operation.

Acid Rain Part renewal applications must meet the same submission deadline as the Title V permit renewal application for the source.

The designated representative of any operating combustion unit that wishes the unit to become a SO₂ Opt-in unit may submit an Acid Rain Part application and a monitoring plan to the Administrator and DEP Bureau of Air Regulation at any time. Within 21 calendar days from the date the DEP Bureau of Air Regulation issues or denies a draft Title V permit revision incorporating the unit as an acid rain unit, the designated representative of the unit must submit to the Administrator and DEP Bureau of Air Regulation, in writing, a confirmation or rescission of the unit's intention to become a SO₂ Opt-in unit. The Administrator shall treat the failure to make a timely submission as a rescission of the unit's intention to become a SO₂ Opt-in unit and as a withdrawal of the application.

<p><u>Submit this form and a copy to:</u></p> <p>DEP Bureau of Air Regulation MS 5505 2600 Blair Stone Rd Tallahassee, FL 32399-2400</p>	<p><u>For SO₂ Opt-in units, also send this form or its equivalent to the Administrator at:</u></p> <p>U.S. Environmental Protection Agency Clean Air Markets Division (6204J) 1200 Pennsylvania Ave NW Washington, DC 20460</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



(305) 295-1000
1001 James Street
PO Box 6100
Key West, FL 33041-6100
www.KeysEnergy.com

UTILITY BOARD OF THE CITY OF KEY WEST

July 21, 2009

Florida Department of Environmental Protection
Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Acid Rain New Unit Exemption

To Whom It May Concern:

Enclosed you will find the "Acid Rain New Unit Exemption" forms required per our Title V permit renewal instruction (0870003-008-AV) for Keys Energy Services located at 6900 Front Street Extended, Key West, FL 33040.

Please contact me at (305) 295-1134 if more information is needed.

Sincerely,

Edward Garcia
Director of Generation
Edward.Garcia@Keysenergy.com

c:
L. Tejeda, General Manager & CEO
J. Wetzler, Asst. Gen Manager & CFO
A. Deese, FMPA
FILE: SOF-110

Enclosures

Acid Rain New Unit Exemption

For more information, see instructions and refer to Rule 62-214.340(1), F.A.C., and 40 CFR 72.7

This submission is New Revised

STEP 1

Identify the new unit by plant name, state, ORIS or Plant Code (if assigned) and unit ID#.

Plant Name: Stock Island Power Plant	State: Florida	ORIS/Plant Code: 7143	Unit ID#: D-1
--------------------------------------	----------------	-----------------------	---------------

STEP 2

List to one decimal place the nameplate capacity of each generator served by the unit. Then total these entries and enter the result.

					TOTAL
8.3					8.8
MWe	MWe	MWe	MWe	MWe	MWe

STEP 3

List all fuels currently burned or expected to be burned, by the unit, and the percent sulfur content by weight of each.

Fuel (current)	Sulfur Content (current)	Fuel (expected)	Sulfur Content (expected)
No. 2 Ultra Low Sulfur Fuel Oil	0.00041%	No. 2 Ultra Low Sulfur Fuel Oil	0.05%
	%		%
	%		%
	%		%

STEP 4

Identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.7(a).

January 1, 2009

STEP 5

Read the special provisions.

Special Provisions

- (1) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(1), F.A.C., shall (i) comply with the requirements of 40 CFR 72.7(a) for all periods for which the unit is exempt under Rule 62-214.340(1), F.A.C., and (ii) comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (2) For any period for which a unit is exempt under Rule 62-214.340(1), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR Part 74. As a non-Acid Rain unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR Part 70.
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(1), F.A.C., shall retain at the source that includes the unit records demonstrating that the requirements of 40 CFR 72.7(a) are met. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. Such records shall include, for each delivery of fuel to the unit or for fuel delivered to the unit continuously by pipeline, the type of fuel, the sulfur content, and the sulfur content of each sample taken. The owners and operators bear the burden of proof that the requirements of paragraph 40 CFR 72.7(a) are met.
- (4) On the earliest of the following dates, a unit exempt under Rule 62-214.340(1), F.A.C., shall lose its exemption and become an Acid Rain unit: (i) the date on which the unit first serves one or more generators with total nameplate capacity in excess of 25 MWe; (ii) the date on which the unit burns any coal or coal-derived fuel except for coal-derived gaseous fuel with a total sulfur content no greater than natural gas; or (iii) January 1 of the year following the year in which the annual average sulfur content for gaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)) or for nongaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)). Notwithstanding 40 CFR 72.30(b) and (c), the designated representative for a unit that loses its exemption under 40 CFR 72.7 shall submit a complete Acid Rain Part application 60 days after the first date on which the unit is no longer exempt. For the purpose of applying monitoring requirements under 40 CFR Part 75, a unit that loses its exemption under Rule 62-214.340(1), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit is no longer exempt.

Plant Name (from STEP 1)
Stock Island Power Plant

STEP 6

Read the appropriate certification statement; provide name, title, owner company name, phone, and e-mail address; and sign and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the acid rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	<i>Edward Garcia</i>	Title	<i>Director of Generation elbas - Keys Energy Services</i>	
Owner Company Name	<i>Utility Board of The City of Key West</i>			
Phone	<i>305-295-1134</i>	E-mail Address	<i>Edward.Garcia@keysenergy.com</i>	
Signature	<i>Edward Garcia</i>		Date	<i>7/21/09</i>

Certification (for certifying officials only)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title		
Owner Company Name			
Phone	E-mail Address		
Signature			Date

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title		
Owner Company Name			
Phone	E-mail Address		
Signature			Date

Acid Rain New Unit Exemption

For more information, see instructions and refer to Rule 62-214.340(1), F.A.C., and 40 CFR 72.7

This submission is: New Revised

STEP 1

Identify the new unit by plant name, state, ORIS or Plant Code (if assigned) and unit ID#.

Plant Name Stock Island Power Plant	State Florida	ORIS/Plant Code 7144	Unit ID# D-2
-------------------------------------	---------------	-------------------------	--------------

STEP 2

List to one decimal place the nameplate capacity of each generator served by the unit. Then total these entries and enter the result.

					TOTAL
8.8					8.8
MWe	MWe	MWe	MWe	MWe	MWe

STEP 3

List all fuels currently burned or expected to be burned, by the unit, and the percent sulfur content by weight of each.

Fuel (current)	Sulfur Content (current)	Fuel (expected)	Sulfur Content (expected)
No. 2 Ultra Low Sulfur Fuel Oil	0.00041%	No. 2 Ultra Low Sulfur Fuel Oil	0.05%
	%		%
	%		%
	%		%

STEP 4

Identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.7(a).

January 1, 2009

STEP 5

Read the special provisions.

Special Provisions

(1) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(1), F.A.C., shall (i) comply with the requirements of 40 CFR 72.7(a) for all periods for which the unit is exempt under Rule 62-214.340(1), F.A.C., and (ii) comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.

(2) For any period for which a unit is exempt under Rule 62-214.340(1), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR Part 74. As a non-Acid Rain unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR Part 70.

(3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(1), F.A.C., shall retain at the source that includes the unit records demonstrating that the requirements of 40 CFR 72.7(a) are met. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. Such records shall include, for each delivery of fuel to the unit or for fuel delivered to the unit continuously by pipeline, the type of fuel, the sulfur content, and the sulfur content of each sample taken. The owners and operators bear the burden of proof that the requirements of paragraph 40 CFR 72.7(a) are met.

(4) On the earliest of the following dates, a unit exempt under Rule 62-214.340(1), F.A.C., shall lose its exemption and become an Acid Rain unit: (i) the date on which the unit first serves one or more generators with total nameplate capacity in excess of 25 MWe; (ii) the date on which the unit burns any coal or coal-derived fuel except for coal-derived gaseous fuel with a total sulfur content no greater than natural gas; or (iii) January 1 of the year following the year in which the annual average sulfur content for gaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)) or for nongaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)). Notwithstanding 40 CFR 72.30(b) and (c), the designated representative for a unit that loses its exemption under 40 CFR 72.7 shall submit a complete Acid Rain Part application 60 days after the first date on which the unit is no longer exempt. For the purpose of applying monitoring requirements under 40 CFR Part 75, a unit that loses its exemption under Rule 62-214.340(1), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit is no longer exempt.

Plant Name (from STEP 1)
Stock Island Power Plant

STEP 6

Read the appropriate certification statement; provide name, title, owner company name, phone, and e-mail address; and sign and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the acid rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name <i>Edmond Garcia</i>	Title <i>Director of Generation</i>
Owner Company Name <i>Utility Board of the City of Key West</i>	
Phone <i>305-295-1134</i>	E-mail Address <i>Edmond.Garcia@keysenergy.com</i>
Signature <i>Edmond Garcia</i>	Date <i>7/2/07</i>

Certification (for certifying officials only)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title
Owner Company Name	
Phone	E-mail Address
Signature	Date

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title
Owner Company Name	
Phone	E-mail Address
Signature	Date

Acid Rain New Unit Exemption

For more information, see instructions and refer to Rule 62-214.340(1), F.A.C., and 40 CFR 72.7

This submission is: New Revised

STEP 1

Identify the new unit by plant name, state, ORIS or Plant Code (if assigned) and unit ID#.

Plant Name: Stock Island Power Plant	State: Florida	ORIS/Plant Code	Unit ID#: CT-1
--------------------------------------	----------------	-----------------	----------------

STEP 2

List to one decimal place the nameplate capacity of each generator served by the unit. Then total these entries and enter the result.

					TOTAL
23.5					23.5
MWe	MWe	MWe	MWe	MWe	MWe

STEP 3

List all fuels currently burned or expected to be burned, by the unit, and the percent sulfur content by weight of each.

Fuel (current)	Sulfur Content (current)	Fuel (expected)	Sulfur Content (expected)
No. 2 Ultra Low Sulfur Fuel Oil	0.00041% %	No. 2 Ultra Low Sulfur Fuel Oil	0.05% %
	%		%
	%		%

STEP 4

Identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.7(a).

January 1, 2009

STEP 5

Read the special provisions.

Special Provisions

- (1) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(1), F.A.C., shall (i) comply with the requirements of 40 CFR 72.7(a) for all periods for which the unit is exempt under Rule 62-214.340(1), F.A.C., and (ii) comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (2) For any period for which a unit is exempt under Rule 62-214.340(1), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR Part 74. As a non-Acid Rain unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR Part 70.
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(1), F.A.C., shall retain at the source that includes the unit records demonstrating that the requirements of 40 CFR 72.7(a) are met. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. Such records shall include, for each delivery of fuel to the unit or for fuel delivered to the unit continuously by pipeline, the type of fuel, the sulfur content, and the sulfur content of each sample taken. The owners and operators bear the burden of proof that the requirements of paragraph 40 CFR 72.7(a) are met.
- (4) On the earliest of the following dates, a unit exempt under Rule 62-214.340(1), F.A.C., shall lose its exemption and become an Acid Rain unit: (i) the date on which the unit first serves one or more generators with total nameplate capacity in excess of 25 MWe; (ii) the date on which the unit burns any coal or coal-derived fuel, except for coal-derived gaseous fuel with a total sulfur content no greater than natural gas; or (iii) January 1 of the year following the year in which the annual average sulfur content for gaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)) or for nongaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)). Notwithstanding 40 CFR 72.30(b) and (c), the designated representative for a unit that loses its exemption under 40 CFR 72.7 shall submit a complete Acid Rain Part application 60 days after the first date on which the unit is no longer exempt. For the purpose of applying monitoring requirements under 40 CFR Part 75, a unit that loses its exemption under Rule 62-214.340(1), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit is no longer exempt.

Plant Name (from STEP 1)
Stock Island Power Plant

STEP 6

Read the appropriate certification statement; provide name, title, owner company name, phone, and e-mail address; and sign and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the acid rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name <i>Edward Garcia</i>	Title <i>Director of Generation</i> <i>Abra - Keys Energy Services</i>
Owner Company Name <i>Utility Board of The City of Key West</i>	
Phone <i>305-295-1134</i>	E-mail Address <i>Edward.Garcia@keysenergy.com</i>
Signature <i>Edward Garcia</i>	Date <i>7/21/09</i>

Certification (for certifying officials only)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title
Owner Company Name	
Phone	E-mail Address
Signature	Date

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title
Owner Company Name	
Phone	E-mail Address
Signature	Date

Acid Rain New Unit Exemption

For more information, see instructions and refer to Rule 62-214.340(1), F.A.C., and 40 CFR 72.7

This submission is: New Revised

STEP 1

Identify the new unit by plant name, state, ORIS or Plant Code (if assigned) and unit ID#.

Plant Name Stock Island Power Plant	State Florida	ORIS/Plant Code	Unit ID# CT-2
-------------------------------------	---------------	-----------------	---------------

STEP 2

List to one decimal place the nameplate capacity of each generator served by the unit. Then total these entries and enter the result.

					TOTAL
19.77					19.77
MWe	MWe	MWe	MWe	MWe	MWe

STEP 3

List all fuels currently burned or expected to be burned, by the unit, and the percent sulfur content by weight of each.

Fuel (current)	Sulfur Content (current)	Fuel (expected)	Sulfur Content (expected)
No. 2 Ultra Low Sulfur Fuel Oil	0.00041%	No. 2 Ultra Low Sulfur Fuel Oil	Less than 0.05%
	%		%
	%		%

STEP 4

Identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.7(a).

January 1, 2009

STEP 5

Read the special provisions.

Special Provisions

- (1) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(1), F.A.C., shall (i) comply with the requirements of 40 CFR 72.7(a) for all periods for which the unit is exempt under Rule 62-214.340(1), F.A.C., and (ii) comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (2) For any period for which a unit is exempt under Rule 62-214.340(1), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR Part 74. As a non-Acid Rain unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR Part 70.
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(1), F.A.C., shall retain at the source that includes the unit records demonstrating that the requirements of 40 CFR 72.7(a) are met. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. Such records shall include, for each delivery of fuel to the unit or for fuel delivered to the unit continuously by pipeline, the type of fuel, the sulfur content, and the sulfur content of each sample taken. The owners and operators bear the burden of proof that the requirements of paragraph 40 CFR 72.7(a) are met.
- (4) On the earliest of the following dates, a unit exempt under Rule 62-214.340(1), F.A.C., shall lose its exemption and become an Acid Rain unit: (i) the date on which the unit first serves one or more generators with total nameplate capacity in excess of 25 MWe; (ii) the date on which the unit burns any coal or coal-derived fuel except for coal-derived gaseous fuel with a total sulfur content no greater than natural gas; or (iii) January 1 of the year following the year in which the annual average sulfur content for gaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)) or for nongaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)). Notwithstanding 40 CFR 72.30(b) and (c), the designated representative for a unit that loses its exemption under 40 CFR 72.7 shall submit a complete Acid Rain Part application 60 days after the first date on which the unit is no longer exempt. For the purpose of applying monitoring requirements under 40 CFR Part 75, a unit that loses its exemption under Rule 62-214.340(1), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit is no longer exempt.

Plant Name (from STEP 1)
Stock Island Power Plant

STEP 6

Read the appropriate certification statement; provide name, title, owner company name, phone, and e-mail address; and sign and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the acid rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name <i>Edward Garcia</i>	Title <i>Director of Conservation</i>
Owner Company Name <i>Utility Board of The City of Key West</i>	
Phone <i>305-295-1134</i>	E-mail Address <i>Edward.Garcia@keyenergy.com</i>
Signature <i>[Signature]</i>	Date <i>7/21/09</i>

Certification (for certifying officials only)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title
Owner Company Name	
Phone	E-mail Address
Signature	Date

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title
Owner Company Name	
Phone	E-mail Address
Signature	Date

Acid Rain New Unit Exemption

For more information, see instructions and refer to Rule 62-214.340(1), F.A.C., and 40 CFR 72.7

This submission is: New Revised

STEP 1

Identify the new unit by plant name, state, ORIS or Plant Code (if assigned) and unit ID#.

Plant Name Stock Island Power Plant	State Florida	ORIS/Plant Code	Unit ID# CT-3
-------------------------------------	---------------	-----------------	---------------

STEP 2

List to one decimal place the nameplate capacity of each generator served by the unit. Then total these entries and enter the result.

					TOTAL
19.77					19.77
MWe	MWe	MWe	MWe	MWe	MWe

STEP 3

List all fuels currently burned or expected to be burned, by the unit, and the percent sulfur content by weight of each.

Fuel (current)	Sulfur Content (current)	Fuel (expected)	Sulfur Content (expected)
No. 2 Ultra Low Sulfur Fuel Oil	0.00041%	No. 2 Ultra Low Sulfur Fuel Oil	Less than 0.05%
	%		%
	%		%

STEP 4

Identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.7(a).

January 1, 2009

STEP 5

Read the special provisions.

Special Provisions

- (1) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(1), F.A.C., shall (i) comply with the requirements of 40 CFR 72.7(a) for all periods for which the unit is exempt under Rule 62-214.340(1), F.A.C., and (ii) comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (2) For any period for which a unit is exempt under Rule 62-214.340(1), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR Part 74. As a non-Acid Rain unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR Part 70.
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(1), F.A.C., shall retain at the source that includes the unit records demonstrating that the requirements of 40 CFR 72.7(a) are met. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. Such records shall include, for each delivery of fuel to the unit or for fuel delivered to the unit continuously by pipeline, the type of fuel, the sulfur content, and the sulfur content of each sample taken. The owners and operators bear the burden of proof that the requirements of paragraph 40 CFR 72.7(a) are met.
- (4) On the earliest of the following dates, a unit exempt under Rule 62-214.340(1), F.A.C., shall lose its exemption and become an Acid Rain unit: (i) the date on which the unit first serves one or more generators with total nameplate capacity in excess of 25 MWe; (ii) the date on which the unit burns any coal or coal-derived fuel except for coal-derived gaseous fuel with a total sulfur content no greater than natural gas; or (iii) January 1 of the year following the year in which the annual average sulfur content for gaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)) or for nongaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)). Notwithstanding 40 CFR 72.30(b) and (c), the designated representative for a unit that loses its exemption under 40 CFR 72.7 shall submit a complete Acid Rain Part application 60 days after the first date on which the unit is no longer exempt. For the purpose of applying monitoring requirements under 40 CFR Part 75, a unit that loses its exemption under Rule 62-214.340(1), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit is no longer exempt.

Plant Name (from STEP 1)
Stock Island Power Plant

STEP 6

Read the appropriate certification statement; provide name, title, owner company name, phone, and e-mail address; and sign and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the acid rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name <i>Edward Garcia</i>		Title <i>Director of Conservation</i>	
Owner Company Name <i>Utility Board of the City of Long Beach</i>			
Phone <i>325-295-1134</i>		E-mail Address <i>Edward.Garcia@kaysenergy.com</i>	
Signature <i>[Signature]</i>		Date <i>7/21/09</i>	

Certification (for certifying officials only)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name		Title	
Owner Company Name			
Phone		E-mail Address	
Signature		Date	

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name		Title	
Owner Company Name			
Phone		E-mail Address	
Signature		Date	

STEP 6 A Certificate of Representation for the source must be submitted to U.S. EPA no later than the submission of this form to the DEP Bureau of Air Regulation.

A Certificate of Representation form may be downloaded from the following website:
<http://www.epa.gov/airmarkets/business/docs/forms/designatedrepresentativeform.doc>.

The designated representative or alternate designated representative must read, sign, and date the certification at STEP 6 labeled "for designated representatives or alternate designated representative only" and submit this form.

If no designated representative has been authorized, a certifying official for each owner of the unit must read, sign, and date the certification at STEP 6 labeled "for certifying officials only," enter his or her name, title, name of the ownership company for which he or she is the certifying official, phone number, email address, and then sign and date and submit this form. A certifying official is not required to submit a Certificate of Representation. If there is more than one owner of a new unit for which no designated representative has been authorized, each owner of the unit must have a certifying official sign the appropriate certification at STEP 6.

Submission Deadlines

The form must be submitted to the DEP Bureau of Air Regulation by December 31 of the first year for which the unit is to be exempt.

Submission Instructions

Submit this form and a copy to:

FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Also send a copy to:

U.S. Environmental Protection Agency
Clean Air Markets Division (6204J)
Attn: New Unit Exemption
1200 Pennsylvania Ave NW
Washington, DC 20460

If you have questions regarding this form, contact your local, State, or EPA Regional acid rain contact, or call EPA's Clean Air Markets Hotline at (202) 343-9620.



(305) 295-1000
1001 James Street
PO Box 6100
Key West, FL 33041-6100
www.KeysEnergy.com

UTILITY BOARD OF THE CITY OF KEY WEST

August 5, 2009

DEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Acid Rain Retired Unit Exemption

To Whom It May Concern:

Enclosed you will find the "Acid Rain Retired Unit Exemption" for Keys Energy Services' Stock Island Power Plant located at 6900 Front Street Extended, Key West, FL 33040.

Please contact me at (305) 295-1134 if more information is needed.

Sincerely,

Edward Garcia
Director of Generation
Edward.Garcia@Keysenergy.com

c:
L. Tejeda, General Manager & CEO
J. Wetzler, Asst. Gen Manager & CFO
A. Deese, FMPA
FILE: SOF-110

Enclosures

Acid Rain, CAIR, and Hg Budget Retired Unit Exemption

For more information, see instructions and refer to 40 CFR 72.8, 96.105, 96.205, 96.305, and 60.4105; and Rules 62-214.340(2), 62-296.470, and 62-296.480, F.A.C.

This submission is: New Revised

STEP 1

Identify the unit by plant name, State, ORIS code and unit ID#.

Plant Name Stock Island Power Plant	State FL	ORIS/Plant Code 6584	Unit ID# 1
--------------------------------------------	-----------------	-----------------------------	-------------------

Applicable Program(s): Acid Rain CAIR NO_x Annual CAIR SO₂ CAIR NO_x Ozone Season
 Mercury (Hg) Budget Trading

STEP 2

Identify the date on which the unit was (or will be) permanently retired.

01/01/1998

STEP 3

If an acid rain affected unit, identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.8(d).

January 1, 1998

STEP 4

Read the special provisions.

Acid Rain Special Provisions

- (1) A unit exempt under Rule 62-214.340(2), F.A.C., shall not emit any sulfur dioxide and nitrogen oxides starting on the date that the exemption takes effect. The owners and operators of the unit will be allocated allowances in accordance with 40 CFR Part 73, Subpart B. If the unit is a Phase I unit, for each calendar year in Phase I, the designated representative of the unit shall submit a Phase I permit application in accordance with 40 CFR Part 72, Subparts C and D, and an annual certification report in accordance with 40 CFR 72.90 through 72.92 and is subject to 40 CFR 72.95 and 72.96.
- (2) A unit exempt under Rule 62-214.340(2), F.A.C., shall not resume operation unless the designated representative of the source that includes the unit submits a complete Acid Rain Part application under Rule 62-214.320, F.A.C., for the unit not less than 24 months prior to the date on which the unit is first to resume operation.
- (3) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under Rule 62-214.340(2), F.A.C., shall comply with the requirements of Chapter 62-214, F.A.C., and the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) For any period for which a unit is exempt under Rule 62-214.340(2), F.A.C., the unit is not an Acid Rain unit and is not eligible to be an opt-in source under 40 CFR Part 74. As a non-Acid Rain Unit, the unit shall continue to be subject to any other applicable requirements under Chapter 62-213, F.A.C.
- (5) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-214.340(2), F.A.C., shall retain at the source that includes the unit records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. The owners and operators bear the burden of proof that the unit is permanently retired.
- (6) On the earlier of the following dates, a unit exempt under Rule 62-214.340(2), F.A.C., shall lose its exemption and become an Acid Rain Unit: (i) the date on which the designated representative submits an Acid Rain Part application under paragraph (2); or (ii) the date on which the designated representative is required under paragraph (2) to submit an Acid Rain Part application. For the purpose of applying monitoring requirements under 40 CFR Part 75, a unit that loses its exemption under Rule 62-214.340(2), F.A.C., shall be treated as a new unit that commenced commercial operation on the first date on which the unit resumes operation.

Plant Name (from STEP 1) **Stock Island Power Plant**

STEP 4
(continued)

CAIR Special Provisions

- (1) A unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a), shall not emit any sulfur dioxide or nitrogen oxides starting on the date that the exemption takes effect. The DEP will allocate CAIR NO_x allowances in accordance with Rule 62-296.470, F.A.C.
- (2) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under Rule 62-296.470, F.A.C., shall retain at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the EPA or the DEP. The owners and operators bear the burden of proof that the unit is permanently retired.
- (3) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a), shall comply with the applicable requirements of the CAIR NO_x Annual Trading Program, the CAIR SO₂ Trading Program, and the CAIR NO_x Ozone Season Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) A unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a), and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR Part application under Rule 62-213.420, F.A.C., for the unit before the date on which the unit resumes operation.
- (5) On the earlier of the following dates, a unit exempt under 40 CFR 96.105(a), 96.205(a), or 96.305(a) shall lose its exemption:
 - (i) the date on which the CAIR designated representative submits a CAIR Part application under Special Provision (4) above;
 - (ii) the date on which the CAIR designated representative is required under Special Provision (4) above to submit a CAIR Part application for the unit; or
 - (iii) the date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR Part application for the unit.
- (6) For the purpose of applying monitoring, reporting and recordkeeping requirements under 40 CFR Part 96, Subparts HH, HHH, and/or HHHH, a unit that loses its exemption under 40 CFR 96.105(a), 96.205(a), or 96.305(a), shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

Mercury (Hg) Budget Trading Special Provisions

- (1) A unit exempt under 40 CFR 60.4105(a) shall not emit any mercury starting on the date that the exemption takes effect.
- (2) The DEP will allocate Hg allowances under Rule 62-296.480, F.A.C.
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 60.4105(a) shall retain at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the EPA or the DEP. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the Hg designated representative of a unit exempt under 40 CFR 60.4105(a) shall comply with the requirements of the Hg Budget Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 60.4105(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the Hg designated representative of the source submits a complete Hg Budget Part application under 40 CFR 60.4122 and Rule 62-213.420, F.A.C., for the unit before the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 60.4105(a) shall lose its exemption:
 - (i) the date on which the Hg designated representative submits a Hg Budget Part application for the unit under Special Provision (5);
 - (ii) the date on which the Hg designated representative is required under Special Provision (5) to submit a Hg Budget Part application for the unit; or
 - (iii) the date on which the unit resumes operation, if the Hg designated representative is not required to submit a Hg Budget Part application for the unit.
- (7) For the purpose of applying monitoring, reporting and recordkeeping requirements under 40 CFR 60.4170 through 60.4176, a unit that loses its exemption under 40 CFR 60.4105(a) shall be treated as a unit that commences operation and commercial operation on the first date on which the unit resumes operation.

Plant Name (from STEP 1) **Stock Island Power Plant**

STEP 5
Make Statement of Compliance.

Statement of Compliance

I state that the unit identified above in STEP 1 was (or will be) permanently retired on the date identified in STEP 2 and will comply with the Special Provisions listed in STEP 4.

STEP 6
Read the certification and sign and date.

Certification (for designated representatives or alternate designated representatives only)

I am authorized to make this submission on behalf of the owners and operators of the affected source and affected unit for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Edward Garcia	Title Director of Generation
Owner Company Name Keys Energy Services	
Phone 305-295-1134	Email Edward.garcia@keysenergy.com
Signature <i>Edward Garcia</i>	Date <i>3/5/09</i>

Environmental Radiation Studies
Environmental Impact Studies
Radiation Dose Modeling
Risk Assessment



Technical Services, Inc.

Atmospheric Dispersion Modeling
Air Pollution Permitting
Landscape Design
Graphic Arts

August 26, 2009

Mr. Edward Garcia
Keys Energy Services
P. O. Box 6100
Key West, Florida 33041-6100

Re: Stock Island Title V Permit Renewal
Request for Additional Information
File Number 0870003-011-AV

Dear Mr. Garcia:

This is in response to Item 5 of the Request for Additional Information from DEP dated July 8, 2009 regarding File Number 0870003-011-AV for the renewal of the Title V permit for your Stock Island facility. All of the engines at your facility are existing compression ignition engines and are not subject to the requirements of 40 CFR 63 Subpart ZZZZ or 40 CFR 60 Subparts IIII or JJJJ.

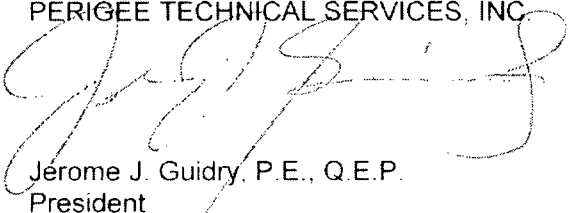
Regarding your plans to replace your 3 high speed diesels with a 2.2 MW emergency generator, if you are willing to accept a limit on annual fuel consumption for the new generator of 32,000 gallons per year, the unit will qualify for a categorical exemption from permitting per 62-210.300(3)(a). In your response to the RAI, please indicate your desire to add this new emergency generator to your new permit to replace the three diesel peaking generators included as part of emissions unit 010 and include the specifications sheet that you sent to me.

The new emergency generator will be subject to 40 CFR 63 Subpart ZZZZ as a new compression ignition engine at an area source of HAPs. It must meet the requirements of ZZZZ by meeting the requirements of 40 CFR part 60 Subpart IIII for compression ignition engines.

Please call me at (407) 333-7374 if you have any questions.

Very truly yours,

PERIGEE TECHNICAL SERVICES, INC



Jérôme J. Guidry, P.E., Q.E.P.
President

JJG:emc

cc: Amy Deese

\\RAI\ResponselItem5.wpd\271.0

3214 Deer Chase Run, Longwood, Florida 32779-3173
Telephone (407) 333-7374 FAX (407) 479-3433

DIESEL GENERATOR SET

CATERPILLAR®

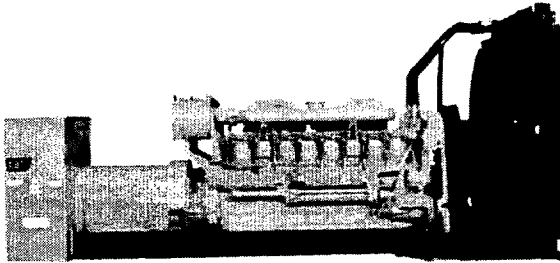


Image shown may not reflect actual package.

STANDBY

**2000 kW 2500 kVA
60 Hz 1800 rpm 480 Volts**

Caterpillar is leading the power generation marketplace with Power Solutions engineered to deliver unmatched flexibility, expandability, reliability, and cost-effectiveness.

FEATURES

FUEL/EMISSIONS STRATEGY

- Low fuel consumption

UL 2200

- UL 2200 listed packages available. Certain restrictions may apply. Consult with your Caterpillar Dealer.

FULL RANGE OF ATTACHMENTS

- Wide range of bolt-on system expansion attachments, factory designed and tested
- Flexible packaging options for easy and cost effective installation

SINGLE-SOURCE SUPPLIER

- Fully prototype tested with certified torsional vibration analysis available

WORLDWIDE PRODUCT SUPPORT

- Caterpillar® dealers provide extensive post sale support including maintenance and repair agreements
- Caterpillar dealers have over 1,600 dealer branch stores operating in 200 countries
- The Cat® S•O•SSM program cost effectively detects internal engine component condition, even the presence of unwanted fluids and combustion by-products

CAT 3516B TA DIESEL ENGINE

- Reliable, rugged, durable design
- Field-proven in thousands of applications worldwide
- Four-stroke-cycle diesel engine combines consistent performance and excellent fuel economy with minimum weight

CAT SR5 GENERATOR

- Matched to the performance and output characteristics of Caterpillar engines
- Industry leading mechanical and electrical design
- Industry leading motor starting capabilities
- High Efficiency

CAT EMCP 3 SERIES CONTROL PANELS

- Simple user friendly interface and navigation
- Scalable system to meet a wide range of customer needs
- Integrated Control System and Communications Gateway

STANDBY 2000 ekW 2500 kVA

60 Hz 1800 rpm 480 Volts



FACTORY INSTALLED STANDARD & OPTIONAL EQUIPMENT

System	Standard	Optional
Air Inlet	<ul style="list-style-type: none"> • Single element canister type air cleaner • Service indicator 	<ul style="list-style-type: none"> • Dual element & heavy duty air cleaners (with pre-cleaners) • Air inlet adapters & shutoff
Exhaust	<ul style="list-style-type: none"> • Dry exhaust manifold • Flanged faced outlets 	<ul style="list-style-type: none"> • Mufflers and Silencers • Stainless steel exhaust flex fittings • Elbows, flanges, expanders & Y adapters
Fuel	<ul style="list-style-type: none"> • Secondary fuel filters • Fuel priming pump • Flexible fuel lines • Fuel cooler* 	<ul style="list-style-type: none"> • Water separator • Duplex fuel filter
	*Not included with packages without radiators	
SR5 Generator	<ul style="list-style-type: none"> • Class H insulation • CAT digital voltage regulator (CDVR) with KVAR/PF control, 3-phase sensing • Reactive droop 	<ul style="list-style-type: none"> • Premium & oversize generators • Winding temperature detectors • Anti-condensation heaters
Power Termination	<ul style="list-style-type: none"> • Bus bar (NEMA and IEC mechanical lug holes) -right side standard • Top and bottom cable entry 	<ul style="list-style-type: none"> • Circuit breakers, UL listed, 3 pole with shunt trip, 100% rated, choice of trip units, manual or electrically operated (low voltage only) • Circuit breakers, IEC compliant, 3 or 4 pole with shunt trip (low voltage only), choice of trip units, manual or electrically operated • Shroud cover for bottom cable entry • Power terminations can be located on the left and/or rear as an option. Also, multiple circuit breakers can be ordered (up to 2)
Governor	• ADEM™3	• Load share module
Control Panels	<ul style="list-style-type: none"> • User Interface panel (UIP) - rear mount • EMCP3.1 Genset Controller • Voltage and Speed adjust • AC&DC customer wiring area (right side) • Reactive droop • Emergency Stop Pushbutton 	<ul style="list-style-type: none"> • EMCP3.3 • Option for right or left mount UIP • Local & remote annunciator modules • Load share module • Discrete I/O module • Generator temperature monitoring & protection
Lube	<ul style="list-style-type: none"> • Lubricating oil and filter • Oil drain line with valves • Fumes disposal • Gear type lube oil pump 	<ul style="list-style-type: none"> • Oil level regulator • Deep sump oil pan • Electric & air prelube pumps • Manual prelube with sump pump • Duplex oil filter
Mounting	<ul style="list-style-type: none"> • Structural steel tube • Anti-vibration mounts (shipped loose) 	<ul style="list-style-type: none"> • Isolator removal • Spring-type isolator, zona 4
Starting/Charging	<ul style="list-style-type: none"> • 24 volt starting motor(s) • Batteries with rack and cables • Battery disconnect switch 	<ul style="list-style-type: none"> • Battery chargers (10&20AMP) • 45 amp charging alternator • Oversize batteries • Ether starting aid • Heavy duty starting motors • Barring device (manual) • Air starting motor with control & silencer

SPECIFICATIONS

CAT GENERATOR

Caterpillar Generator

Frame size.....	1625
Excitation.....	IE
Pitch.....	0.6667
Number of poles.....	4
Number of leads.....	6
Insulation.....	UL 1446 Recognized Class H with tropicalization and antiabrasion
IP rating.....	IP23
Alignment.....	Pilot Shaft
Overspeed capability - % of rated.....	125
Wave form.....	002.00
Paralleling kit/Droop transformer.....	Standard
Voltage regulator.3 Phase sensing with selectable volts/Hz	
Voltage regulation.....	Less than +/- 1/2% (steady state)
Less than +/- 1% (no load to full load)	
Telephone Influence Factor.....	Less than 50
Harmonic Distortion.....	Less than 5%

CAT DIESEL ENGINE

3516B TA, V-16, 4-stroke-cycle watercooled diesel

Bore - mm.....	170.00 mm (6.69 in)
Stroke - mm.....	190.00 mm (7.48 in)
Displacement - L.....	69.00 L (4210.64 in ³)
Compression ratio.....	14.0:1
Aspiration.....	TA
Fuel system.....	Electronic unit injection
Governor type.....	Caterpillar ADEM control system

CAT EMCP CONTROL PANEL

- EMCP 3.1 (Standard)
- EMCP 3.2 / EMCP 3.3 (Option)
- Single location customer connector point
- True RMS AC metering, 3-phase
- Controls
 - Run / Auto / Stop control
 - Speed adjust
 - Voltage Adjust
 - Emergency Stop Pushbutton
 - Engine cycle crank
- Digital Indication for:
 - RPM
 - Operating hours
 - Oil pressure
 - Coolant temperature
 - System DC volts
 - L-L volts, L-N volts, Phase amps, Hz
 - kW, kVA, kVAR, kWhr, %kW, PF (EMCP 3.2 / 3.3)
- Shutdowns with common indicating light for:
 - Low oil pressure
 - High coolant temperature
 - Low coolant level
 - Overspeed
 - Emergency stop
 - Failure to start (overcrank)
- Programmable protective relaying functions: (EMCP 3.2 & 3.3)
 - Under and over voltage
 - Under and over frequency
 - Overcurrent (time and inverse time)
 - Reverse power (EMCP 3.3)
- MODBUS isolated data link, RS-485 half-duplex (EMCP 3.2 & 3.3)
- Options
 - Vandal door
 - Local annunciator module
 - Remote annunciator module
 - Input / Output module
 - RTD / Thermocouple modules
 - Monitoring software

STANDBY 2000 e kW 2500 kVA

60 Hz 1800 rpm 480 Volts



TECHNICAL DATA

Open Generator Set - - 1800 rpm/60 Hz/480 Volts	DM7916	
Low Fuel Consumption		
Coolant to aftercooler Coolant to aftercooler temp max	30 °C	86 °F
Fuel Consumption 100% load with fan 75% load with fan 50% load with fan	513.8 L/hr 386.3 L/hr 268.3 L/hr	135.7 Gal/hr 102.0 Gal/hr 70.9 Gal/hr
Cooling System¹ Engine coolant capacity with radiator/exp. tank Engine coolant capacity Radiator coolant capacity	421.0 L 233.0 L 188.0 L	111.2 gal 61.6 gal 49.7 gal
Inlet Air Combustion air inlet flow rate	171.4 m ³ /min	6052.9 cfm
Exhaust System Exhaust stack gas temperature Exhaust gas flow rate Exhaust flange size (internal diameter) Exhaust system backpressure (maximum allowable)	449.9 °C 430.6 m ³ /min 203.2 mm 6.7 kPa	841.8 °F 15206.6 cfm 8.0 in 26.9 in. water
Heat Rejection Heat rejection to coolant (total) Heat rejection to exhaust (total) Heat rejection to aftercooler Heat rejection to atmosphere from engine Heat rejection to atmosphere from generator	733 kW 1881 kW 555 kW 136 kW 109.7 kW	41686 Btu/min 106972 Btu/min 31563 Btu/min 7734 Btu/min 6238.6 Btu/min
Alternator² Motor starting capability @ 30% voltage dip Frame Temperature Rise	5925 skVA 1625 125 °C	225 °F
Lube System Sump refill with filter	401.3 L	106.0 gal
Emissions (Nominal)³ NOx g/hp-hr CO g/hp-hr HC g/hp-hr PM g/hp-hr	8.28 g/hp-hr 39 g/hp-hr 28 g/hp-hr .092 g/hp-hr	

¹ For ambient and altitude capabilities consult your Caterpillar dealer. Air flow restriction (system) is added to existing restriction from factory.

² Generator temperature rise is based on a 40° C (104° F) ambient per NEMA MG1-32.

³ Emissions data measurement procedures are consistent with those described in EPA CFR 40 Part 89, Subpart D & E and ISO8178-1 for measuring HC, CO, PM, NOx. Data shown is based on steady state operating conditions of 77°F, 28.42 in HG and number 2 diesel fuel with 35° API and LHV of 18,390 btu/lb. The nominal emissions data shown is subject to instrumentation, measurement, facility and engine to engine variations. Emissions data is based on 100% load and thus cannot be used to compare to EPA regulations which use values based on a weighted cycle.

STANDBY 2000 e kW 2500 kVA

60 Hz 1800 rpm 480 Volts



RATING DEFINITIONS AND CONDITIONS

Meets or Exceeds International Specifications: AS1359, CSA, IEC60034-1, ISO3046, ISO8528, NEMA MG 1-22, NEMA MG 1-33, UL508A, 72/23/EEC, 98/37/EC, 2004/108/EC

Standby - Output available with varying load for the duration of the interruption of the normal source power. Average power output is 70% of the standby power rating. Typical operation is 200 hours per year, with maximum expected usage of 500 hours per year.

Standby power in accordance with ISO8528. Fuel stop power in accordance with ISO3046. Standby ambients shown indicate ambient temperature at 100% load which results in a coolant top tank temperature just below the shutdown temperature.

Ratings are based on SAE J1349 standard conditions.

These ratings also apply at ISO3046 standard conditions.

Fuel rates are based on fuel oil of 35° API [16° C (60° F)]

gravity having an LHV of 42 780 kJ/kg (18,390 Btu/lb)

when used at 29° C (85° F) and weighing 838.9 g/liter

(7.001 lbs/U.S. gal.). Additional ratings may be available

for specific customer requirements, contact your

Caterpillar representative for details. For information

regarding Low Sulfur fuel and Biodiesel capability,

please consult your Caterpillar dealer.

STANDBY 2000 kW 2500 kVA

60 Hz 1800 rpm 480 Volts



DIMENSIONS

Package Dimensions		
Length	6266.6 mm	246.72 in
Width	2587.6 mm	101.87 in
Height	3050.7 mm	120.11 in
Weight	16 293 kg	35,920 lb

NOTE: For reference only - do not use for installation design. Please contact your local dealer for exact weight and dimensions. (General Dimension Drawing #2858791).

Performance No.: DM7916

Feature Code: 516DE5E

Gen. Arr. Number: 2523844

Source: U.S. Sourced

May 27 2009

14155070

www.CAT-ElectricPower.com

© 2009 Caterpillar
All rights reserved.

Materials and specifications are subject to change without notice.
The International System of Units (SI) is used in this publication.

CAT, CATERPILLAR, SAFETY.CAT.COM their respective logos, "Caterpillar Yellow," and the POWER EDGE trade dress, as well as corporate and product identity used herein, are trademarks of Caterpillar and may not be used without permission.