



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 8, 2009

ELECTRONIC MAIL READ RECEIPT REQUESTED

Mr. Edward Garcia - edward.garcia@keysenergy.com
Environmental/Safety Officer
Keys Energy Services
P.O. Box 6100
Key West, Florida 33041-6100

Re: Request for Additional Information Regarding Title V Renewal Application
File No. 0870003-011-AV
Stock Island Power Plant
Monroe County

Dear Mr. Garcia:

On May 15, 2009 the Department received your application for a Title V renewal permit for the Stock Island Power Plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please submit the following additional requirements for a Title V renewal application which did not appear to have been submitted:
 - a. Facility Plot Plan,
 - b. Process Flow Diagram,
 - c. Precautions to Prevent Emissions of Unconfined Particulate Matter,
 - d. List of Insignificant Activities,
 - e. Identification of Applicable Requirements, and
 - f. Verification of Risk Management Plan Submission to EPA.
2. As appropriate for each emission unit, please provide the following additional requirements for a Title V renewal application which did not appear to have been submitted:
 - a. Process Flow Diagram,
 - b. Fuel Analysis or Specification,
 - c. Detailed Description of Control Equipment,
 - d. Procedures for Startup and Shutdown,
 - e. Operation and Maintenance Plan, and
 - f. Emission Unit Specific Applicable Requirements.
3. Please specify whether or not a selective catalytic reduction unit is installed for EU011.
4. The Acid Rain Part Application submitted with the application listed only one unit. The facility's Title V permit no. 0870003-008-AV identified four emissions units regulated under the Acid Rain Program. The referenced Title V permit included a retired unit and two (2) new unit exemptions. Please re-evaluate the facility's emission units subject to the acid rain program. Please re-submit the Acid Rain Part Application, if necessary, including the new unit exemption forms and the retired unit exemption form.

5. Please specify if any of the facility's generators or other emissions units are subject to 40 CFR 60 Subpart III, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines. If applicable,
 - a. Please specify how the facility is complying with the applicable subpart(s).
 - b. Please provide the following information for each emission unit subject to the referenced subparts: in-service date, cylinder displacement, and rule applicability.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item number(s) 1, 2, and 4 above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to Item number(s) 1, 2, 4, and 5 above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C. In order to ensure that your acid rain permit is effective by January 1, 2010, you are highly encouraged to respond to this request as soon as possible.

If you should have any questions, please call Susan Machinski, Engineering Specialist IV, at 239/332-6975, ext. 109.

Sincerely,



Jonathan Holtom, P.E., CPM
Title V Program Administrator
Bureau of Air Regulation

JH/sm

Copy to:

Mr. Jerome Guidry, Perigee Technical Services, Inc. – jerome.guidry@att.net
Ms. Amy Dees, Florida Municipal Power Association – amy.deesc@fmipa.com
Mr. Sherrill Culliver, DEP – sherrill.culliver@dep.state.fl.us

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, July 08, 2009 3:15 PM
To: 'edward.garcia@keysenergy.com'
Cc: 'jerome.guidry@att.net'; 'amy.deese@fmpa.com'; Culliver, Sherrill; Holtom, Jonathan; Walker, Elizabeth (AIR); Friday, Barbara
Subject: Request for Additional Information - Keys Energy Services - Stock Island Power Plant (0870003-011-AV)
Attachments: RAI 0870003-011-AV.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Garcia, Edward [Edward.Garcia@KeysEnergy.com]
Sent: Wednesday, July 08, 2009 3:59 PM
To: Livingston, Sylvia
Subject: RE: Request for Additional Information - Keys Energy Services - Stock Island Power Plant (0870003-011-AV)

Mrs. Livingston,

I was able to view your document.

Edward Garcia
Director – Generation
Keys Energy Services
PO Box 6100
Key West, FL 33041-6100
305.295.1134 (w) 305.295.1145 (f)

 consider the environment before printing this email

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, July 08, 2009 3:15 PM
To: Garcia, Edward
Cc: jerome.guidry@att.net; amy.deese@fmpa.com; Culliver, Sherrill; Holtom, Jonathan; Walker, Elizabeth (AIR); Friday, Barbara
Subject: Request for Additional Information - Keys Energy Services - Stock Island Power Plant (0870003-011-AV)

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: jerome.guidry@att.net
Sent: Monday, July 13, 2009 2:06 PM
To: Livingston, Sylvia
Subject: Re: Request for Additional Information - Keys Energy Services - Stock Island Power Plant (0870003-011-AV)

Ms. Livingston,

Just wanted to let you know that the updated version of Acrobat Reader was able to read your attachment. Thanks.

--
Jerome J. Guidry, P.E., Q.E.P.
Perigee Technical Services, Inc.
3214 Deer Chase Run
Longwood, FL 32779-3173
Voice: 407/333-7374
FAX: 407/479-3433

----- Original message from "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>: -----

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Thank you,

Sylvia Livingston
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