



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

December 29, 2008

Electronically Sent – Received Receipt Requested.

Mr. Edward S. Leongomez, Primary Responsible Official (eleongomez@fmpa.com)
Treasure Coast Energy Center
Fort Pierce Utilities Authority
4545 Energy Lane
Fort Pierce, Florida 34981

Re: DEP File Nos. 1110121-002-AV and 1110121-003-AC
Initial Title V Air Operation Permit and Air Construction Permit Modification
Request for Additional Information


Dear Mr. Leongomez:

The Florida Department of Environmental Protection has reviewed your response to our letter requesting additional information concerning your application for an Initial Title V Air Operation Permit and an Air Construction Permit Modification for the Treasure Coast Energy Center. However, we must deem your application *still incomplete*, because we need further information relative to the following items:

1. Our letter requested that you provide an estimate of potential pollutant emissions changes due to implementing the modifications to Specific Condition 18 (Excess Emissions Allowed) of Air Construction Permit 1110121-001-AC. You responded that no increases of emissions are expected. We note that among your recommended modifications to the condition is the definition of "any 24-hour period" as "a calendar day, midnight to midnight". These time span concepts are clearly not equivalent. For example, if excess emissions occur in the two hours before midnight of a given day and continue for the two hours after midnight, these four hours of excess emissions would be considered a permit violation under the "two hours in any 24-hour period" criterion, but not under the changed condition criterion. In addition, this change appears to contradict the entries in Specific Condition 13 in the column titled "CEMS Average". Therefore, please do an analysis of the expected impact of emissions changes due to this request utilizing historical CEMS data, and provide us the results.
2. We have been informed by the Department's Southeast District Compliance Office that the facility may have recently experienced nitrogen oxides (NO_x) excess emissions in two consecutive calendar quarters, as reported in the continuous emissions monitoring system (CEMS) quarterly reports. Please comment on this finding, and include a compliance plan to address these concerns and bring the facility back into compliance if warranted.
3. The modeling files have been reviewed by our meteorologist. The meteorological data should be processed using surface characteristics from the airport. Then, the highest predicted impact should be modeled using albedo, surface roughness and bowen ratio from the Treasure Coast Energy Center site to ensure that the airport surface characteristics were the more conservative of the two. Further, please explain how any increase in modeled concentrations would not change the results of the Class I analysis.

When we receive this information, we will continue processing your application. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. 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. Permit applicants are advised that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Sincerely,


for Jonathan K. Holtom, P.E., CPM
Program Administrator
Title V Section

Cc: Mr. Stanley A. Armbruster, P.E., Black & Veatch: Armbruster@bv.com
Mr. Joe Lurix, Southeast District Office: joe.lurix@dep.state.fl.us
Ms. Katy Forney, EPA Region 4: forney.kathleen@epa.gov
Ms. Debbie Nelson, Special Projects Section: deborah.nelson@dep.state.fl.us

Friday, Barbara

To: eleongomez@fmpa.com
Cc: Armbruster@bv.com; Lurix, Joe; Forney.Kathleen@epamail.epa.gov; Nelson, Deborah; Cascio, Tom
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information
Attachments: EdwardLeongomez1110121-002-AV&1110121-003-ACRAI.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 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,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Friday, Barbara

To: esl@fua.com
Cc: Cascio, Tom
Subject: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information
Attachments: EdwardLeongomez1110121-002-AV&1110121-003-ACRAI.pdf

From: Friday, Barbara
Sent: Monday, December 29, 2008 3:20 PM
To: 'ed.leongomez@fmpa.com'
Cc: Cascio, Tom
Subject: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

From: Friday, Barbara
Sent: Monday, December 29, 2008 1:48 PM
To: 'eleongomez@fmpa.com'
Cc: 'Armbruster@bv.com'; Lurix, Joe; 'Forney.Kathleen@epamail.epa.gov'; Nelson, Deborah; Cascio, Tom
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Friday, Barbara

From: Exchange Administrator
Sent: Tuesday, December 30, 2008 8:45 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)
Attachments: ATT218955.txt; FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

esl@fpua.com

Friday, Barbara

From: Ed Leongomez [eleongomez@fpua.com]
To: undisclosed-recipients
Sent: Tuesday, December 30, 2008 9:10 AM
Subject: Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center
- Request for Additional Information

Your message

To: eleongomez@fpua.com
Subject:

was read on 12/30/2008 9:10 AM.

Friday, Barbara

From: Ed Leongomez [eleongomez@fpua.com]
Sent: Tuesday, December 30, 2008 9:11 AM
To: Friday, Barbara
Subject: RE: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Barbara,

I have received this message.

Thank you,

Ed

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Tuesday, December 30, 2008 8:45 AM
To: Ed Leongomez
Cc: Cascio, Tom
Subject: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Friday, Barbara
Sent: Monday, December 29, 2008 3:20 PM
To: 'ed.leongomez@fmpa.com'
Cc: Cascio, Tom
Subject: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

From: Friday, Barbara
Sent: Monday, December 29, 2008 1:48 PM
To: 'eleongomez@fmpa.com'
Cc: 'Armbruster@bv.com'; Lurix, Joe; 'Forney.Kathleen@epamail.epa.gov'; Nelson, Deborah; Cascio, Tom
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

Friday, Barbara

From: System Administrator
To: ArmbrusterSA@bv.com
Sent: Monday, December 29, 2008 3:34 PM
Subject: Delivered: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Your message

To: ArmbrusterSA@bv.com
Subject: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information
Sent: 12/29/2008 2:52 PM

was delivered to the following recipient(s):

ArmbrusterSA@bv.com on 12/29/2008 2:53 PM

Friday, Barbara

From: Armbruster, Stanley A. (Stan) [ArmbrusterSA@bv.com]
To: Friday, Barbara
Sent: Monday, December 29, 2008 2:55 PM
Subject: Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center
- Request for Additional Information

Your message

To: ArmbrusterSA@bv.com
Subject:

was read on 12/29/2008 2:55 PM.

Friday, Barbara

From: Jeff Hanson [Jeff.Hanson@fmpa.com]
Sent: Monday, December 29, 2008 2:37 PM
To: Friday, Barbara
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Return Receipt

Your DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional
document: Information
was Jeff.Hanson@fmpa.com
received by:
at: 12/29/2008 02:36:50 PM

Friday, Barbara

From: System Administrator
To: Lurix, Joe
Sent: Monday, December 29, 2008 1:48 PM
Subject: Delivered:DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Your message

To: eleongomez@fmpa.com
Cc: Armbruster@bv.com; Lurix, Joe; Forney.Kathleen@epamail.epa.gov; Nelson, Deborah; Cascio, Tom
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information
Sent: 12/29/2008 1:48 PM

was delivered to the following recipient(s):

Lurix, Joe on 12/29/2008 1:48 PM

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Monday, December 29, 2008 1:49 PM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250
OK, sent 49591B98_20740_792_1 951641DC00D

Friday, Barbara

From: System Administrator
To: Cascio, Tom; Nelson, Deborah
Sent: Monday, December 29, 2008 1:48 PM
Subject: Delivered:DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Your message

To: eleongomez@fmpa.com
Cc: Armbruster@bv.com; Lurix, Joe; Forney.Kathleen@epamail.epa.gov; Nelson, Deborah; Cascio, Tom
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information
Sent: 12/29/2008 1:48 PM

was delivered to the following recipient(s):

Cascio, Tom on 12/29/2008 1:48 PM
Nelson, Deborah on 12/29/2008 1:48 PM

Friday, Barbara

From: Cascio, Tom
To: Friday, Barbara
Sent: Monday, December 29, 2008 2:04 PM
Subject: Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center
- Request for Additional Information

Your message

To: eleongomez@fmpa.com
Cc: Arnbruster@bv.com; Lurix, Joe; Forney.Kathleen@epamail.epa.gov; Nelson, Deborah;
Cascio, Tom
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy
Center - Request for Additional Information
Sent: 12/29/2008 1:48 PM

was read on 12/29/2008 2:04 PM.

Friday, Barbara

From: Nelson, Deborah
To: Friday, Barbara
Sent: Tuesday, December 30, 2008 1:10 PM
Subject: Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center
- Request for Additional Information

Your message

To: eleongomez@fmpa.com
Cc: Armbruster@bv.com; Lurix, Joe; Forney.Kathleen@epamail.epa.gov; Nelson, Deborah;
Cascio, Tom
Subject: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy
Center - Request for Additional Information
Sent: 12/29/2008 1:48 PM

was read on 12/30/2008 1:10 PM.

Friday, Barbara

From: Konrad Lisiewicz [Konrad.Lisiewicz@fmpa.com]
Sent: Monday, December 29, 2008 3:30 PM
To: Friday, Barbara
Subject: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Return Receipt

Your document was received by:
at: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information
Konrad.Lisiewicz@fmpa.com
12/29/2008 03:29:55 PM