



October 9, 2009

Mr. Jonathon Holtom, P.E.
Program Administrator, Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

RECEIVED

093-89508

OCT 14 2009

BUREAU OF AIR REGULATION

**RE: REQUEST FOR ADDITIONAL INFORMATION
INDIAN RIVER PLANT TITLE V AIR OPERATION PERMIT RENEWAL
PERMIT NO. 0090008-005-AV**

Dear Mr. Holtom:

The Orlando Utilities Commission (OUC) is in receipt of a Request for Additional Information (RAI) from the Florida Department of Environmental Protection with respect to the above-referenced permitting action. Specifically, a letter was received from the Department, dated July 14, 2009, indicating that additional information was necessary in order to continue the processing of the Title V renewal permit. The responses are provided below in the order received in the Department's letter.

1. Please specify if any of the facility's generators or other emissions units are subject to 40 CFR 60 Subpart IIII, 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,

- Please specify how the facility is complying with the applicable subpart(s).
- Please provide the following information for each emission unit subject to the referenced subparts: in-service date, cylinder displacement, and rule applicability.

Response: According to available manufacturer's data for the emergency generators onsite at the Indian River Plant, the Detroit Diesel engines are each listed as a 12V-71 model, consisting of 12 cylinders at 71 cubic inches per cylinder. The in-service date for both of these units was August 1, 1990. Based on these factors, the units are not subject to any of the above-referenced standards. These are the only diesel generators in use at the site.

If you should have any additional questions or concerns, please don't hesitate to contact me at (813) 287-1717.

Sincerely,

GOLDER ASSOCIATES INC.

Scott Osbourn, P.E.
Associate and Senior Consultant



Golder Associates Inc.
5100 W. Lemon Street, Suite 114
Tampa, FL 33609 USA
Tel: (813) 287-1717 Fax: (813) 287-1716 www.golder.com



Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America

cc: David Baez, OUC
Garfield Blair, OUC
Tom Casio, FDEP

Attachments

SO/PP/ev