From: Zuczek, Jeffrey
To: Attalla, Yousry
Cc: Zuczek, Jeffrey
Subject: RE: Martin Title V Permit Renewal further requested changes
Date: Tuesday, July 30, 2013 3:39:21 PM
Importance: High

Joe,

It appears that FL rules utilize the first two digits (e.g. Major Group) of the SIC code in determining a Title V classification. As such, it appears that the generator located at the adjacent Martin Gas Yard will be included in the Martin Title V facility. As such, I agree that retaining this new generator in Martin's Title V permit renewal to identify that it is subject to applicable Subpart JJJJ NSPS requirements is a good idea. Since it is exempt from permitting, for the facility's tracking purposes, FPL would appreciate a Permitting Note, or clarifier, in the permit identifying generator(s) exempt from permitting that must remain under the FL fuel thresholds in 62-210 FAC.

FPL would further appreciate confirmation from the Department that this generator is exempt from air construction permitting pursuant to 62-210 FAC.

Thank you for working with me on this,

Jeff

From: Zuczek, Jeffrey
Sent: Tuesday, July 30, 2013 2:31 PM
To: yousry.attalla@dep.state.fl.us
Cc: Zuczek, Jeffrey
Subject: RE: Martin Title V Permit Renewal further requested changes
Importance: High

Joe,

To clarify, I was just informed that this gas yard is owned by FPL, not FGT, but operated solely by a different Business Unit in our company that the Martin plant. The Martin Title V facility is operated by FPL's Power Generation Division (PGD), whereas the adjacent Martin Gas Yard is operated by FPL's Fuels and Infrastructure Business Unit. These Business Units are operated by separate entities within our company. I am currently checking into the SIC code associated with this gas yard. My belief is that it should still fall under a different SIC code from the Martin Title V facility, and therefore not require incorporation into the Title V.

I will contact you as soon as I have verification on the SIC code.

I apologize for the confusion.

Jeff

From: Zuczek, Jeffrey
Sent: Tuesday, July 30, 2013 2:00 PM
To: yousry.attalla@dep.state.fl.us
Cc: Zuczek, Jeffrey
Subject: FW: Martin Title V Permit Renewal further requested changes
Importance: High

Joe,

Please accept this email as a follow-up to our conversation today. The "new" emergency natural gas generator that I notified you in regards to the Title V renewal will reside in a Florida Gas Transmission (FGT) fuel yard near to the Martin Title V facility. As such, it should not require incorporation into the Title V renewal as previously thought, since Florida Gas Transmission resides under a different SIC code (4922) from the Martin site (4911). Despite this, the same exemption from permitting should still hold as mentioned below in accordance with 62-210.300(3)(a)(35), provided this one (1) emergency generator remains under the applicable fuel threshold to avoid permitting. Please find attached updated spec sheets and EPA emission information for this particular generator.

FPL acknowledges that since this specific emergency generator is still subject to NSPS Subpart JJJJ, both FPL and FGT will ensure that it complies with this regulation.

FPL would appreciate a response at the Department's earliest convenience identifying that this one (1) natural gas "emergency" generator is exempt from permitting.

Thank you,

Jeff

From: Zuczek, Jeffrey
Sent: Tuesday, July 09, 2013 9:43 AM
To: yousry.attalla@dep.state.fl.us
Cc: Zuczek, Jeffrey
Subject: Martin Title V Permit Renewal further requested changes
Importance: High

Joe,

Along with my recent request below regarding Part 75 QA/QC allowance, it has just come to my attention that the Martin facility plans to acquire a new "emergency" natural gas fueled RICE generator. In order to aid the Department in avoiding the necessity of future permitting endeavors, I thought it would make sense to
incorporate this engine during the currently open Martin Title V permit renewal. Since this engine is 1) "emergency" in nature, and 2) is natural-gas fueled, it will fall under the FL Rule exemption under 62-210.300(3)(a)35, and therefore not require a separate air construction permit application; though it is ultimately required to be listed in the Title V permit for the facility since it is technically an emission source.

Since this engine is "new," "stationary," and "natural-gas fueled," it is subject to NSPS 40 CFR 60 Subpart JJJJ and will comply with all applicable requirements under this federal rule (hour limitations, record-keeping, etc..) Under NESHAPS Subpart ZZZZ, via 40 CFR 63.6590©(6), it must only comply with Subpart JJJJ,

as applicable.

The current specs I have for this engine are as follows:

- Emergency-use
- Natural-gas fueled
- 48 horsepower
- 3 liters and 6 cylinders (i.e. 0.5 liters/cylinder)

Please let me know if you require any further information in order to incorporate this new "emergency" engine in the currently pending Martin Title V permit renewal.

Sincerely,

Jeff Zuczek

From: Zuczek, Jeffrey
Sent: Wednesday, July 03, 2013 11:19 AM
To: yousry.attalla@dep.state.fl.us
Cc: Zuczek, Jeffrey
Subject: PMR Unit 8 Change Request in Title V Renewal
Importance: High

Joe,

I apologize for this delayed request regarding the Martin Title V renewal application. Our folks in Power Generation Division have requested the ability to utilize Part 75 QA/QC procedures as an acceptable alternative to Part 60, specifically for the CO monitors. At PMR, this would qualify for Unit 8 (EU's 011,012,017,018). This will affect the underlying Air Construction Permit (0850001-010-AC) as well. Since the application to the Department was a joint Title V Renewal and Air Construction permit application, FPL would appreciate the modification of both for the CO monitor applicability.

Accordingly, in the Title V air operation permit (0850001-018-AV), Specific Condition E.17, Section a, would need to be revised as follows:

a. CO Monitors. The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4 or 4a. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, **or Part 75**, and the Data Assessment Report…"

Accordingly, in the underlying Air Construction Permit (0850001-010-AC), Subsection A, Specific Condition 24(a), the language would need to be revised similarly:

a. CO Monitors. The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4 or 4a. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, **or Part 75**, and the Data Assessment Report…"

Please let me know if you would like to discuss further.

Have a great 4th of July!

Jeff

Jeffrey Zuczek, M.S, B.S
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