From: Zuczek, Jeffrey
To: Attalla, Yousry
Cc: Zuczek, Jeffrey
Subject: RE: New PMR Emergency Generator for Title V Renewal
Date: Wednesday, July 10, 2013 8:46:12 AM

Joe,

Some more information on the new "emergency" Martin generator:

- Date Purchased - Not purchased yet. Expect to purchase by July 19, 2013.
- Date Installed - Not installed yet, but, it is slated for need between August 19 and October 18, 2013 (will depend on issuance of DEP authorized permit).
- Date Ordered - Not ordered yet. Expect to order/purchase by July 19, 2013.
- Brand Name, Model #, Serial # - TBD. Waiting on bids to come back. We bid the following: Generac Power Systems, Inc. Guardian QT025 25 KW, 60 Hz, (3600 RPM ENGINE), UL Listed, Naturally Aspirated Gaseous Fueled 1.5L Engine. Have a call tomorrow with one vendor to work out discrepancies in current models vs our bid spec.

The above are only approximations. As noted, FPL is waiting on bids to come back before any final decisions are made. The spec sheets/emission data I sent you yesterday are for the Generac which at this point appears to be the most likely option. In either case, the genset with final approval will have similar parameters to those I forwarded you yesterday.

Thank you,

Jeff

From: Zuczek, Jeffrey
Sent: Tuesday, July 09, 2013 12:42 PM
To: yousry.attalla@dep.state.fl.us
Cc: Zuczek, Jeffrey
Subject: New PMR Emergency Generator for Title V Renewal

Joe,

Please find attached 1) the location of the new generator, 2) Spec Sheet for generator and engine, and 3) Emissions spec sheet.

The "emergency" generator will be located in the adjacent gas yard at the Martin plant.

Here are the specs briefly:

- Generac engine/generator
- Model: V type
- 3.0 liters and 6.0 cylinders
- Natural Gas fueled

- Order/Purchase date is 2013 (should be enough for rule applicability)
- Certified by manufacturer (please see attached)

The engine specs indicate "naturally aspirated" which leaves me to believe it is "4-stroke." On whether or not it is Rich or Lean burn, my educated guess is "Rich," but the spec sheet does not clearly identify (e.g. no exhaust oxygen percentage listed). However, by taking into account that we know the emission certification levels for NOx, VOC, CO, and PM from the attached emission spec sheet, we can back-track through Subpart JJJJ to see what may apply. It appears that 40 CFR 60.4233(d) is applicable to this engine based on fuel type and horsepower rating. This stanza would normally have required knowing whether or not the engine was Rich or Lean burn, but only if it was LPG. In our case, this engine will be Natural Gas, so the knowledge of rich vs. lean burn is not required. Thus, Table 1 in Subpart JJJJ for "emergency" engines appears to apply; specifically, focusing on "emergency" engines 25 to 130 HP. This engine, via the manufacturer's emission certification, meets these applicable limits.

Please let me know if this provides enough information to go forward with incorporation in the Title V renewal.

Thank you,

Jeff

Jeffrey Zuczek, M.S, B.S
Environmental Services
Florida Power & Light Company
A Subsidiary of NextEra Energy, Inc.
700 Universe Blvd (JES/JB)
Juno Beach, FL 33408
Office: 561-691-2635
Cell: 561-568-9079