From: Zuczek, Jeffrey
To: Attalla, Yousry
Cc: Zuczek, Jeffrey
Subject: Martin Title V Permit Renewal further requested changes
Date: Tuesday, July 09, 2013 9:43:38 AM
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
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