UTILITY BOARD OF THE CITY OF KEY WEST

POST OFFICE DRAWER 6100 KEY WEST, FLORIDA 33041-6100



TELEPHONE: (305) 295-1000

www.kwcityelectric.com

June 23,1999

Mr. Scott Sheplak
Division of Air Resources Management
Bureau of Air Regulation – Title V Section
Florida Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUN 28 1999

BUREAU OF AIR REGULATION

Re: Change Request – Draft Title V Permit No. 0870003-001-AV

Dear Mr. Sheplak:

The Draft Title V Permit received by City Electric System States in Section III. Emissions Units and Conditions; Subsection A. Two Medium Speed Diesel Generators; Test Methods and Procedures; A.15, that CO and Be shall be included in annual compliance testing.

In the previous permit (No. A044-207419) the two parameters required testing "within one year prior to the expiration date of this permit", not annually. The contractor conducting our compliance testing has informed us that testing for the two (CO and Be) would require a substantial increase in time and expense compared to the parameters required in permit # A044-207419.

Please accept this letter as a request to establish the same annual compliance test parameters in the Final Title V Permit as were contained in the previous permit.

Please contact me at (305)-295-1148 if more information is needed.

Sincerely,

UTILITY BOARD - CITY OF KEY WEST

CITY ELECTRIC SYSTEM

Larry J. Thompson, General Manager

J. Stone

Environmental Services Supervisor

Js/

CC

L. Thompson, General Manager

R. Rodriguez, Assistant General Manager

C. Jansen, T. D & G Manager

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7/2/99 cc: Scott ShepleK

UTILITY BOARD MEMBERS: