



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**  
BOB MARTINEZ CENTER  
2600 BLAIRSTONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT  
GOVERNOR

CARLOS LOPEZ-CANTERA  
LT. GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

*Sent by Electronic mail – Received Receipt Requested*

Mr. Michael O'Neill, Manager  
United Technologies – Pratt & Whitney  
P.O. Box 109600  
West Palm Beach, Florida 33410

Re: ASP Request 14-BB-AP  
Pratt & Whitney  
Reductions for Testing in Reciprocating Internal Combustion Engines (RICE) for Carbon Monoxide (CO)  
Tests  
Facility ID No. 0990021

Dear Mr. O'Neill:

The Office of Permitting and Compliance received your request seeking approval for an alternative sampling procedure for a reduction in numbers of RICE tests for CO testing at the referenced facility. Pratt & Whitney owns and operates a jet engine test facility in Palm Beach County, Florida. This facility has over fifty test stands specifically designed to perform tests of rocket engines, jet engines, as well as individual components of each type of engine. Also, located at the facility are fourteen identical stationary RICE (EU092- EU105) which operate in pairs to serve seven generators. Pratt & Whitney is requesting that the performance testing frequency be reduced so that two engines serving a single generator be tested during the initial performance testing. Continuous compliance demonstrations will then follow the requirement of testing every three years or 8,760 hours of operation, whichever comes first. Pratt & Whitney will test a different engine pair during each subsequent compliance demonstration until all fourteen RICE have been tested.

As justification for these requests, Pratt & Whitney submitted a letter from EPA Region 5 dated December 20 of 2012 allowing the same requests to be performed by Saint-Gobain Containers, Inc. of Burlington, Wisconsin for their testing of RICE. The full determination is located at <http://cfpub.epa.gov/adi/> site, listed under control number M130003. As noted in the determination, emissions greater than 50% of the limit will result in the need for all emission units to be tested by October 31, 2014.

The applicant has provided reasonable assurance that this alternate sampling procedure is necessary and will produce acceptable results. The Department's conclusion is based upon professional experience with EPA Methods and the EPA's concurrence as evidenced by the aforementioned determination.

The applicant shall incorporate this alternate procedure into the permit at the next opening for revision or renewal.

Please call Jim Pennington at 850/717-9102 if you have any questions regarding this determination.

The Department's proposed agency action shall become final unless a petition for an administrative hearing is timely under Sections 120.569 and 120.57, F.S., before the deadline for filing a petition set forth below. On the filing of a timely petition, this action will not be final and effective until further order of the Department or the petition has been dismissed or withdrawn. Because the administrative hearing process is designed to formulate final agency action, the hearing process may result in a modification of the agency action or even reversal of the agency action.

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## Alternate Sampling Procedure

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A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, [Agency.Clerk@dep.state.fl.us](mailto:Agency.Clerk@dep.state.fl.us), before the deadline.

The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Once this decision becomes final, any party to this order has the right to seek judicial review by the filing of a Notice of Appeal pursuant to Rules 9.110 and 9.190, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida, 32399-3000, [Agency.Clerk@dep.state.fl.us](mailto:Agency.Clerk@dep.state.fl.us); and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this action is filed with the Agency Clerk.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

**Alternate Sampling Procedure**

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Executed in Tallahassee, Florida.

*Syed Arif*

Syed Arif, Environmental Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this letter of authorization for an alternate sampling procedure was sent by electronic mail with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Michael O'Neill, Pratt & Whitney [michael.oneill@pw.utc.com](mailto:michael.oneill@pw.utc.com)

Mr. Philip Cobb, P.E., Golder Associates: [pcobb@golder.com](mailto:pcobb@golder.com)

Mr. Laxmana Tallam, P.E., Palm Beach County Health Department: [laxmana.tallam@flhealth.gov](mailto:laxmana.tallam@flhealth.gov)

Ms. Diane Pupa, Southeast District Office [diane.pupa@dep.state.fl.us](mailto:diane.pupa@dep.state.fl.us)

Mr. David McNeal, US EPA Region 4: [mcneal.dave@epa.gov](mailto:mcneal.dave@epa.gov)

Ms. Barbara Friday, DEP OPC: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us)

Ms. Lynn Scearce, DEP OPC: [lynn.scearce@dep.state.fl.us](mailto:lynn.scearce@dep.state.fl.us)

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

SA/jp