



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

December 29, 2008

*Electronically Sent – Received Receipt Requested.*

Mr. Edward S. Leongomez, Primary Responsible Official ([eleongomez@fmpa.com](mailto:eleongomez@fmpa.com))  
Treasure Coast Energy Center  
Fort Pierce Utilities Authority  
4545 Energy Lane  
Fort Pierce, Florida 34981

Re: DEP File Nos. 1110121-002-AV and 1110121-003-AC  
Initial Title V Air Operation Permit and Air Construction Permit Modification  
Request for Additional Information

Dear Mr. Leongomez:

The Florida Department of Environmental Protection has reviewed your response to our letter requesting additional information concerning your application for an Initial Title V Air Operation Permit and an Air Construction Permit Modification for the Treasure Coast Energy Center. However, we must deem your application *still incomplete*, because we need further information relative to the following items:

1. Our letter requested that you provide an estimate of potential pollutant emissions changes due to implementing the modifications to Specific Condition 18 (Excess Emissions Allowed) of Air Construction Permit 1110121-001-AC. You responded that no increases of emissions are expected. We note that among your recommended modifications to the condition is the definition of "any 24-hour period" as "a calendar day, midnight to midnight". These time span concepts are clearly not equivalent. For example, if excess emissions occur in the two hours before midnight of a given day and continue for the two hours after midnight, these four hours of excess emissions would be considered a permit violation under the "two hours in any 24-hour period" criterion, but not under the changed condition criterion. In addition, this change appears to contradict the entries in Specific Condition 13 in the column titled "CEMS Average". Therefore, please do an analysis of the expected impact of emissions changes due to this request utilizing historical CEMS data, and provide us the results.
2. We have been informed by the Department's Southeast District Compliance Office that the facility may have recently experienced nitrogen oxides (NO<sub>x</sub>) excess emissions in two consecutive calendar quarters, as reported in the continuous emissions monitoring system (CEMS) quarterly reports. Please comment on this finding, and include a compliance plan to address these concerns and bring the facility back into compliance if warranted.
3. The modeling files have been reviewed by our meteorologist. The meteorological data should be processed using surface characteristics from the airport. Then, the highest predicted impact should be modeled using albedo, surface roughness and bowen ratio from the Treasure Coast Energy Center site to ensure that the airport surface characteristics were the more conservative of the two. Further, please explain how any increase in modeled concentrations would not change the results of the Class I analysis.

When we receive this information, we will continue processing your application. If you have any questions, please contact Project Engineer Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Sincerely,



for Jonathan K. Holtom, P.E., CPM  
Program Administrator  
Title V Section

Cc: Mr. Stanley A. Armbruster, P.E., Black & Veatch: [Armbruster@bv.com](mailto:Armbruster@bv.com)  
Mr. Joe Lurix, Southeast District Office: [joe.lurix@dep.state.fl.us](mailto:joe.lurix@dep.state.fl.us)  
Ms. Katy Forney, EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)  
Ms. Debbie Nelson, Special Projects Section: [deborah.nelson@dep.state.fl.us](mailto:deborah.nelson@dep.state.fl.us)

## Friday, Barbara

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**To:** eleongomez@fmpa.com  
**Cc:** Armbruster@bv.com; Lurix, Joe; Forney.Kathleen@epamail.epa.gov; Nelson, Deborah; Cascio, Tom  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information  
**Attachments:** EdwardLeongomez1110121-002-AV&1110121-003-ACRAI.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

## Friday, Barbara

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**To:** esl@fpu.com  
**Cc:** Cascio, Tom  
**Subject:** FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information  
**Attachments:** EdwardLeongomez1110121-002-AV&1110121-003-ACRAI.pdf

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**From:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 3:20 PM  
**To:** 'ed.leongomez@fmpa.com'  
**Cc:** Cascio, Tom  
**Subject:** FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

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**From:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 1:48 PM  
**To:** 'eleongomez@fmpa.com'  
**Cc:** 'Armbruster@bv.com'; Lurix, Joe; 'Forney.Kathleen@epamail.epa.gov'; Nelson, Deborah; Cascio, Tom  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524

## Friday, Barbara

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**From:** Exchange Administrator  
**Sent:** Tuesday, December 30, 2008 8:45 AM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)  
**Attachments:** ATT218955.txt; FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

[esl@fpua.com](mailto:esl@fpua.com)

**Friday, Barbara**

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**From:** Ed Leongomez [eleongomez@fpua.com]  
**To:** undisclosed-recipients  
**Sent:** Tuesday, December 30, 2008 9:10 AM  
**Subject:** Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center  
- Request for Additional Information

Your message

**To:** [eleongomez@fpua.com](mailto:eleongomez@fpua.com)  
**Subject:**

was read on 12/30/2008 9:10 AM.

## Friday, Barbara

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**From:** Ed Leongomez [eleongomez@fpu.com]  
**Sent:** Tuesday, December 30, 2008 9:11 AM  
**To:** Friday, Barbara  
**Subject:** RE: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Barbara,

I have received this message.

Thank you,

Ed

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**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]  
**Sent:** Tuesday, December 30, 2008 8:45 AM  
**To:** Ed Leongomez  
**Cc:** Cascio, Tom  
**Subject:** FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

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**From:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 3:20 PM  
**To:** 'ed.leongomez@fmpa.com'  
**Cc:** Cascio, Tom  
**Subject:** FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

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**From:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 1:48 PM  
**To:** 'eleongomez@fmpa.com'  
**Cc:** 'Armbruster@bv.com'; Lurix, Joe; 'Forney.Kathleen@epamail.epa.gov'; Nelson, Deborah; Cascio, Tom  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

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Thank you,

Barbara Friday

DEP, Bureau of Air Regulation

(850)921-9524



**Friday, Barbara**

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**From:** System Administrator  
**To:** ArmbrusterSA@bv.com  
**Sent:** Monday, December 29, 2008 3:34 PM  
**Subject:** Delivered: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Your message

**To:** [ArmbrusterSA@bv.com](mailto:ArmbrusterSA@bv.com)  
**Subject:** FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information  
**Sent:** 12/29/2008 2:52 PM

was delivered to the following recipient(s):

[ArmbrusterSA@bv.com](mailto:ArmbrusterSA@bv.com) on 12/29/2008 2:53 PM

**Friday, Barbara**

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**From:** Armbruster, Stanley A. (Stan) [ArmbrusterSA@bv.com]  
**To:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 2:55 PM  
**Subject:** Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center  
- Request for Additional Information

Your message

**To:** [ArmbrusterSA@bv.com](mailto:ArmbrusterSA@bv.com)  
**Subject:**

was read on 12/29/2008 2:55 PM.

**Friday, Barbara**

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**From:** Jeff Hanson [Jeff.Hanson@fmpa.com]  
**Sent:** Monday, December 29, 2008 2:37 PM  
**To:** Friday, Barbara  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

**Return Receipt**

Your DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional  
document: Information  
was [Jeff.Hanson@fmpa.com](mailto:Jeff.Hanson@fmpa.com)  
received by:  
at: 12/29/2008 02:36:50 PM

**Friday, Barbara**

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**From:** System Administrator  
**To:** Lurix, Joe  
**Sent:** Monday, December 29, 2008 1:48 PM  
**Subject:** Delivered:DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Your message

**To:** [eleongomez@fmpa.com](mailto:eleongomez@fmpa.com)  
**Cc:** [Arnbruster@bv.com](mailto:Arnbruster@bv.com); Lurix, Joe; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nelson, Deborah; Cascio, Tom  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information  
**Sent:** 12/29/2008 1:48 PM

was delivered to the following recipient(s):

Lurix, Joe on 12/29/2008 1:48 PM

## Friday, Barbara

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**From:** Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]  
**Sent:** Monday, December 29, 2008 1:49 PM  
**To:** Friday, Barbara  
**Subject:** Successful Mail Delivery Report  
**Attachments:** Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250  
OK, sent 49591B98\_20740\_792\_1 951641DC00D

**Friday, Barbara**

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**From:** System Administrator  
**To:** Cascio, Tom; Nelson, Deborah  
**Sent:** Monday, December 29, 2008 1:48 PM  
**Subject:** Delivered:DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

Your message

**To:** [eleongomez@fmpa.com](mailto:eleongomez@fmpa.com)  
**Cc:** [Armbruster@bv.com](mailto:Armbruster@bv.com); Lurix, Joe; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nelson, Deborah; Cascio, Tom  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information  
**Sent:** 12/29/2008 1:48 PM

was delivered to the following recipient(s):

Cascio, Tom on 12/29/2008 1:48 PM  
Nelson, Deborah on 12/29/2008 1:48 PM

## Friday, Barbara

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**From:** Cascio, Tom  
**To:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 2:04 PM  
**Subject:** Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

### Your message

**To:** [eleongomez@fmpa.com](mailto:eleongomez@fmpa.com)  
**Cc:** [Arnbruster@bv.com](mailto:Arnbruster@bv.com); Lurix, Joe; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nelson, Deborah; Cascio, Tom  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information  
**Sent:** 12/29/2008 1:48 PM

was read on 12/29/2008 2:04 PM.

## Friday, Barbara

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**From:** Nelson, Deborah  
**To:** Friday, Barbara  
**Sent:** Tuesday, December 30, 2008 1:10 PM  
**Subject:** Read: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center  
- Request for Additional Information

Your message

**To:** [eleongomez@fmpa.com](mailto:eleongomez@fmpa.com)  
**Cc:** [Arnbruster@bv.com](mailto:Arnbruster@bv.com); Lurix, Joe; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); Nelson, Deborah;  
Cascio, Tom  
**Subject:** DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy  
Center - Request for Additional Information  
**Sent:** 12/29/2008 1:48 PM

was read on 12/30/2008 1:10 PM.



## Friday, Barbara

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**From:** Konrad Lisiewicz [Konrad.Lisiewicz@fmpa.com]  
**Sent:** Monday, December 29, 2008 3:30 PM  
**To:** Friday, Barbara  
**Subject:** FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information

### Return Receipt

Your document: FW: DEP File Nos.: 1110121-002-AV and 1110121-003-AC - Treasure Coast Energy Center - Request for Additional Information  
was received by: [Konrad.Lisiewicz@fmpa.com](mailto:Konrad.Lisiewicz@fmpa.com)  
at: 12/29/2008 03:29:55 PM