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UTILITY BOARD OF THE CITY OF KEY WEST

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May 15, 2012

Mr. Jonathan Holtom, P.E., CPM  
Title V Program Administrator  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

Re: **Comments on Draft Proposed Permit 0870003-014-AV**

Dear Mr. Holtom:

I am writing to you this letter as the Responsible Official, since Keys Energy Services (KEYS) and Florida Municipal Power Agency (FMPA) would like to submit the following comments on the Draft Proposed Permit 0870003-014-AV for the Stock Island Power Plant.

1. Page 2: Although the draft Construction Permit refers to seven (7) regulated emissions units, the Draft Proposed Title V Permit refers to eight (8). KEYS and FMPA would prefer the black start diesel engine not be listed as a separate emissions unit unless FDEP is required to do so. Although the engine had been listed as a separate insignificant EU previously, it is permitted as part of EU007.
2. Page 8, Condition A.20: Remove the words "at a minimum"
3. Conditions B.17, C.17, D.2.9, and D.3.11: For all ASTM Methods, add "or equivalent"
4. Page 31, Section III, Subsection E, table: change "10.9 l/cylinder" to "10.6 l/cylinder"
5. Page 30, Condition D.3.18: Change "Keys Energy Services" to "FMPA"
6. Technical Evaluation Page 5, Section 3: change "up to 500 hours per year" to "up to 2500 hours per year"

KEYS and FMPA have also identified issues pertaining to Draft Construction Permit 0870003-013-AC. Although we are outside the comment period for this permit, which was issued as a final permit on May 10, 2012, the Department may be able to address the first item as an administrative correction. The second item consists only of a clarification of a reporting requirement.

1. Page 5, table: change "10.9 l/cylinder" to "10.6 l/cylinder"

2. FMPA and KEYS will consider the initial notification submitted to FDEP on December 4, 2009 (attached), supplemented by the additional information provided during this permitting action, to be sufficient to meet the initial notification requirement in Condition 13. Please let us know if the Department requires any other information related to this requirement.

If you have any questions, please do not hesitate to contact me at 305-295-1140.

Sincerely,



Edward Garcia  
Director of Generation  
[Edward.Garcia@keysenergy.com](mailto:Edward.Garcia@keysenergy.com)

C:

L. Tejada, General Manager & CEO  
J. Wetzler, Asst. Gen Manager & CFO  
T. Reedy, FMPA  
A. Deese, FMPA  
J. Koerner, FDEP Bureau of Air Regulation  
A. Satyal, FDEP South District  
S. Culliver, FDEP South District  
B. Nevins, FDEP Marathon Branch Office  
J. Guidry, Perigee Technical Services, Inc  
File: SOF-110



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UTILITY BOARD OF THE CITY OF KEY WEST

December 4, 2009

Jonathan Holtom, P.E., CPM  
Title V Program Administrator  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

Re: Revision to 40 CFR 60 Subpart IIII New Engine Notification  
Stock Island Power Plant  
DEP File No. 0870003-011-AV

Dear Mr. Holtom:

In our August 27 response to the Department's Request for Additional Information, Keys Energy Services and Florida Municipal Power Agency provided a notification of the replacement of our three high speed diesel peaking generators (included as part of emissions Unit 010) with a new 2.2 MW emergency generator.

We would like to revise the notification as follows – instead of a new emergency generator, one of the existing engines will be reconstructed. According to the provisions of 40 CFR 60, Subpart IIII, the reconstructed engine must meet the same requirements as a new engine would be required to meet. The reconstructed engine will have a 2250 kW (3070 HP) rating with a cylinder displacement of 10.6 L (645 cubic inch) per cylinder.

The reconstructed engine will only be used for emergency station service and we are still willing to accept an annual fuel usage limit of 32,000 gallons of diesel per year to qualify for a categorical exemption from permitting. We also still would like to include this reconstructed unit as part of the new Title V permit and we anticipate the reinstallation to be complete in approximately March or April of 2010.

Please contact Amy Deese at 321-239-1004 if you have any questions or require additional information.

Sincerely,

DESK  
COPY

Edward Garcia  
Director of Generation  
Responsible Official, Stock Island Power Plant  
Edward.Garcia@Keysenergy.com

C:  
L. Tejada, General Manager & CEO  
J. Wetzler, Asst. Gen Manager & CFO  
Sherrill Culliver, FDEP SW District  
Susan Machinski, FDEP SW District  
Jerome Guidry, Perigee Technical Services, Inc.