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UTILITY BOARD OF THE CITY OF KEY WEST

January 9, 2013

Mr. Jeffery F. Koerner
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Draft/Proposed Permit 0870003-016-AV
Florida Municipal Power Agency Stock Island Power Plant

Dear Mr. Koerner:

Please consider the following comments and proposed changes to draft permit 0870003-016-AV:

- Condition A.19 – Add Method 3A for O₂.
- Condition A.22 – change "Specific Conditions A.6 - A.11" to "Specific Conditions A.8 - A.13" and add the following wording:
For CO, the most recent compliance test conducted to comply with condition A.23 can be used for compliance with this condition."
- Condition A.27 – Remove "Operational Recordkeeping", "Daily"
While daily recordkeeping is required by rule, daily reporting is not required.
- Condition A.30.a – It is our understanding that 40 CFR 63.6645(h) requires submittal of the Notification of Compliance Status by the 60th day following completion of the performance test for initial compliance demonstrations which do include a performance test. Remove the strikeout so that the condition is consistent with 40 CFR 63.6645(h) as follows: "For each initial compliance demonstration required in Table 5 of 40 CFR Part 63, Subpart ZZZZ that does not include a performance test, FMPA ..."
- Condition A.33 – It is our understanding that Table 7 of ZZZZ requires semi-annual reporting. We suggest that the wording contained in 63.6650(b)(1), (2), (3), and (4) be used in this condition.
- Condition A.34 - change "Specific Condition A.7" to "Specific Condition A.9" and change "Specific Condition A.2" to "Specific Condition A.3"

Please contact Amy Deese at 321-239-1004, if you have any questions.

Sincerely,

Edward Garcia
Director of Generation

CC: Tom Cascio, FDEP DARM
Amy Deese, FMPA
Jerome Guidry, PTS