STATEMENT OF BASIS

City of Vero Beach
City of Vero Beach Municipal Utilities
Facility ID No. 0610029
Indian River County

Permit No. 0610029-009-AV
Title V Operation Permit Renewal

APPLICANT

The applicant for this project is City of Vero Beach Municipal Utilities. The applicant's responsible official and mailing address are: Mr. Tom Richards, Director of Power Resources, City of Vero Beach, 100 17th Street, P.O. Box 1389, Vero Beach, Florida 32961-1389.

FACILITY DESCRIPTION

The facility consists of four steam electric generating units (Units 1, 2, 3 and 4) that range from 13 to 56 megawatts (MW) and use a range of fuel oil grades and natural gas. Only the largest one (Unit 4) is subject to a New Source Performance Standard at 40 Code of Federal Regulations (CFR), Part 60, Subpart D – Standards of Performance for Fossil Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971.

There is also a 38 MW distillate oil and natural gas-fired combined cycle unit (Unit 5) that is subject to 40 CFR 60, Subpart GG - Standards of Performance for New Stationary Combustion Turbines (Subpart GG); a black start engine and two diesel engine-driven emergency generators.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting action is to renew Title V air operation permit No. 0610029-007-AV, which was effective on January 1, 2008 with an expiration date of December 31, 2012.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received May 22, 2012.
Additional Information Requests dated June 22 (e-mail), July 16, 2012 (letter), and September 21, 2012 (e-mail).
Additional Information Responses received by email dated July 16, August 8, and September 21, 2012.
Additional Information Response received by letter dated September 28, 2012.

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 4911 – Electrical Generation.

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

Siting: The facility does not operate units certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to EU Unit 5. Compliance assurance monitoring (CAM) plans were not required for Units 1-4 because they do not have add-on control equipment. CAM applies to Unit 5 when using water injection while burning oil.

GHG: The facility is identified as a major source of green house gas (GHG) pollutants.

PROJECT REVIEW

The purpose of this project is to renew the Title V air operation permit for the City of Vero Beach Municipal Utilities. Changes that were made as part of this renewal include: reformatting the permit to match the current permitting style; replacement of Appendix TV-6 with the following new appendices: Appendix TV, Title V General Conditions, Appendix TR, Facility-wide Testing Requirements and Appendix RR, Facility-wide Reporting Requirements; elimination of the common conditions section; and, streamlining of the emissions unit sub-sections by moving common conditions to the new appendices.

CONCLUSION

This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, 62-213 and 62-214, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.