



Jeb Bush
Governor

John O. Agwunobi, M.D., M.B.A.
Secretary

CERTIFIED MAIL

April 14, 2005

REQUEST FOR ADDITIONAL INFORMATION

Mr. Radu Alexander Damian, Director,
Field Operations, Operations and Maintenance Resources
South Florida Water Management District

3301 Gun Club Road
West Palm Beach, FL 33406

Draft Air Permit No. 0990621-002-AC and
0990621-003-AV

Project: Construction Permit Modification for
Pump Station, S-362

Air Permit Engineer: Jose M. Garcia
PALM BEACH COUNTY

Dear Mr. Damian:

The Palm Beach County Health Department (Health Department) acknowledges receipt of the above referenced application for a state permit to modify a source of air pollution located in Palm Beach County.

[X] Your application for permit is incomplete. Please provide the information listed on the attached sheet promptly. Evaluation of your proposed project will be delayed until all requested information has been received. The processing time clock will remain tolled until the application is made complete.

If you have any questions, please contact the air permit engineer listed above at the numbers below. When referring to this project, please use the draft air permit number indicated above.

Sincerely,

For the Division Director
Environmental Health and Engineering

Jose Garcia, P.E.
Air Pollution Control Section
Phone: (561) 355-3136 FAX: (561) 804-9405

cc: *Darrel Graziani, P.E., Florida Department of Environmental Protection*
Jeffrey A. Smith, South Florida Water Management District
Al Linero, P.E., Florida Department of Environmental Protection

Your application to modify a construction permit and obtain an initial TitleV permit for a source of air pollution located in Palm Beach County has been received and reviewed for completeness. Please submit the following additional information to complete your application:

- (1) As specified in Section IIIA, Emission Unit Specific Condition 1.2(b):

In order to meet NAAQS and PSD class II increments requirements, only low sulfur distillate fuel (0.05 % S) shall be used in the 8 engines listed in EU001 until all the stacks are extended to 24.8 meters, in accordance with the ambient impact modeling results submitted by SFWMD on behalf of the U.S. Army Corps of Engineers.

Please verify that all the stacks have been extended from 18.3 meters to 24.8 meters.

- (2) The revised emission calculations are based on different fuel consumption requirement for each of the two Cummins KTA19-G3, 685 bhp emergency generators than originally submitted (31 gal/hr vs. 37.5 gal/hr – a 21 % increase). The Exhaust Emission Data Sheet provided by the Cummins indicates a design fuel consumption rate equal to 32.2 gal/hr during standby operations. Please provide documentation supporting the proposed fuel consumption rate for the emergency generators.
- (3) The revised emission calculations are based on different fuel consumption requirement for the Cummins NTA855-G3, 535 bhp emergency generators than originally submitted (24.5 gal/hr vs. 29.3 gal/hr – a 19.5 % increase). The Exhaust Emission Data Sheet provided by the Cummins indicates a design fuel consumption rate equal to 25.3 gal/hr during standby operations. Please provide documentation supporting the proposed fuel consumption rate for the emergency generators.
- (4) For the 839 bhp engines, the revised emission calculations for carbon monoxide are based on emission factors that are considerably higher than originally submitted (1.39E-02 lb/hp-hr vs. 6.61E-03 lb/hp-hr). The Engineering Test Report provided by the Fairbanks-Morse for these engines indicates an average CO emission factor of 1.59E-03 lb/hp-hr. Please provide documentation supporting the proposed carbon monoxide emission factor for these engines.
- (5) For the 839 bhp engines, the revised emission calculations for volatile organic compounds are based on emission factors that are considerably lower than originally submitted (5.95E-05 lb/hp-hr vs. 3.3E-03 lb/hp-hr). The Engineering Test Report provided by the Fairbanks-Morse for these engines indicates an average THC emission factor of 5.83E-04 lb/hp-hr. Please provide documentation supporting the proposed volatile organic compound emission factor for these engines.

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