

Department of Environmental Protection

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

April 30, 2004

Mr. Frank W. Cox Director of Utilities and Responsible Official G.W. Ivey Power Plant Homestead City Utilities 675 North Flagler Avenue Homestead, FL 33030

Re: PROPOSED Title V Permit Renewal No. 0250013-002-AV

G.W. Ivey Power Plant

Dear Mr. Cox:

One copy of the "<u>PROPOSED PERMIT RENEWAL DETERMINATION</u>" for the G.W. Ivey Power Plant, located at 660 NE 1 Road, Homestead, Dade County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit renewal has become a PROPOSED permit renewal.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (U.S. EPA) Region 4 office's review. The web site address is:

http://www.dep.state.fl.us/air/permitting/airpermits

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit renewal is made by the USEPA within 45 days, the PROPOSED permit renewal will become a FINAL permit renewal no later than 55 days after the date on which the PROPOSED permit renewal was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit renewal, the FINAL permit renewal will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn. If you have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely.

Trina L. Vielhauer, Chief Bureau of Air Regulation

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Enclosures

Copy furnished to:

Abraham Stroulov, P.E., URS Corporation, 7800 Congress Avenue, Suite 200, Boca Raton, FL 33487 H. Patrick Wong, Dade County Department of Environmental Resources Management U.S. EPA, Region 4

"More Protection, Less Process"

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PROPOSED Permit Renewal Determination Homestead City Utilities G.W. Ivey Power Plant Title V Permit Renewal No. 0250013-002-AV

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to the Homestead City Utilities for the G.W. Ivey Power Plant, located at 660 NE 1 Road, Homestead, Dade County, was clerked on March 23, 2004. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published on March 30, 2004, in the South Dade News Leader, and on March 31, 2004, in the Miami Herald. Proofs of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" were received by fax on April 2, 2004, and April 5, 2004, respectively. The DRAFT Title V Air Operation Permit Renewal was available for public inspection at the Dade County Department of Environmental Resources Management in Miami, and the permitting authority's office in Tallahassee.

II. Public Comment(s).

No comments were received concerning the DRAFT Title V Operation Permit Renewal.

III. Conclusion.

The permitting authority hereby issues PROPOSED Permit Renewal No. 0250013-002-AV, with no changes.

STATEMENT OF BASIS

Homestead City Utilities G.W. Ivey Power Plant Facility ID No. 0250013 Dade County

Title V Air Operation Permit Renewal Permit No. 0250013-002-AV

This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consist of sixteen (16) unregulated dual fuel fired engine generators, two (2) unregulated eooling towers, and various unregulated fuel oil and miscellaneous storage tanks. The generators are peaking units and are used only on a grid demand basis. The highest usage time is generally in the summer time. The facility does keep one generator operating (usually #18, #19, #20 or #21) at idle all the time just for immediate response needs. Generators #2, #3, #13, #14, #15, #16 and #17 are rated at 2070 kW; generators #8, #9 and #10 are rated at 2500 kW; generators #11 and #12 are rated at 3270 kW; generators #20 and #21 are rated at 6485 kW; and, generators #18 and #19 are rated at 8800 kW.

Each generator is started on 100% No. 2 fuel oil and continues until it achieves the proper operating temperature, which takes approximately 5 to 10 minutes. Then, the generators are switched over to a dual fuel firing mode, which is a 95% natural gas and 5% distillate No. 2 fuel oil mixture. The sulfur content of the distillate No. 2 fuel oil being fired is 0.05%, by weight, or less.

Based on the Title V permit renewal application received on March 8, 2004, this facility is not a major source of hazardous air pollutants (HAPs).

Homestead City Utilities **G.W. Ivey Power Plant** Facility ID No. **0250013** Dade County

Title V Air Operation Permit Renewal PROPOSED Permit No. 0250013-002-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Permitting South Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

Fax: 850/922-6979

Compliance Authority:

Dade County Department of Environmental Resources Management
Air Quality Management Division
Suite 900
33 Southwest Second Avenue

Miami, Florida 33130-1540 Telephone: 305/372-6925 Fax: 305/372-6954

Title V Air Operation Permit Renewal PROPOSED Permit No. **0250013-002-AV** Facility ID No. **0250013**

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Permittee:

Homestead City Utilities 675 North Flagler Avenue Homestead, Florida 33030 PROPOSED Permit No. 0250013-002-AV

Facility ID No. **0250013 SIC Nos.**: 49, 4911

Project: Title V Air Operation Permit Renewal

This permit renewal is for the operation of the G.W. Ivey Power Plant. This facility is located at 660 NE 1 Road, Homestead, Dade County; UTM Coordinates: Zone 17, 553.8 km East and 2813.3 km North; Latitude: 25° 28' 24" North and Longitude: 80° 27' 53" West.

This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities. APPENDIX TV-4, TITLE V CONDITIONS (version dated 02/12/02).

Effective Date: Renewal Application Due Date: Expiration Date:

Michael G. Cooke, Director Division of Air Resource Management

MGC/tbc

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of sixteen (16) unregulated dual fuel fired engine generators, two (2) unregulated cooling towers, and various unregulated fuel oil and miscellaneous storage tanks. Based on the Title V permit renewal application received on March 8, 2004, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

Unregulated Emissions Units and/or Activities

E.U. ID No.	Brief Description of Emissions Units and/or Activity
-002	2070 kW Dual Fuel Diesel Generator
-003	2070 kW Dual Fuel Diesel Generator
-008	2500 kW Dual Fuel Diesel Generator
-009	2500 kW Dual Fuel Diesel Generator
-010	2500 kW Dual Fuel Diesel Generator
-011	3270 kW Dual Fuel Diesel Generator
-012	3270 kW Dual Fuel Diesel Generator
-013	2070 kW Dual Fuel Diesel Generator
-014	2070 kW Dual Fuel Diesel Generator
-015	2070 kW Dual Fuel Diesel Generator
-016	2070 kW Dual Fuel Diesel Generator
-017	2070 kW Dual Fuel Diesel Generator
-018	8800 kW Dual Fuel Diesel Generator
-019	8800 kW Dual Fuel Diesel Generator
-020	6485 kW Dual Fuel Diesel Generator
-021	6485 kW Dual Fuel Diesel Generator
-022	Two (2) Cooling Towers for Emission Units Nos. 18 and 19
-023	Various Storage Tanks for Diesel Fuel, Lube Oil and Solvents

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only: Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers Appendix H-1, Permit History/ID Number Changes Statement of Basis

These documents are on file with permitting authority:
Title V Permit Renewal Application received on March 8, 2004.
DRAFT Title V Air Operation Permit clerked on March 23, 2004.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

- 1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit. {Permitting note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
- 2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
- 3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]
- 4. Prevention of Accidental Releases (Section 112(r) of CAA).
- a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center Post Office Box 3346 Merrifield, VA 22116-3346 Telephone: 703/816-4434

and,

- b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C. [40 CFR 68]
- 5. <u>Unregulated Emissions Units and/or Activities.</u> Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit. [Rule 62-213.440(1), F.A.C.]
- 6. <u>Insignificant Emissions Units and/or Activities.</u> Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit. [Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

Homestead City Utilities G.W. Ivey Power Plant

PROPOSED Permit No. 0250013-002-AV Facility ID No. 0250013

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

Nothing was deemed necessary and ordered at this time.

[Rule 62-296.320(1)(a), F.A.C.]

8. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-4, TITLE V CONDITIONS):

The following requirements are "not federally enforceable":

a. Fuel delivery roads and parking lots shall be paved.

[Rule 62-296.320(4)(c)2., F.A.C.; and proposed by applicant in the Title V permit renewal application received on March 8, 2004.]

- 9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]
- 10. The permittee shall submit all compliance related notifications and reports required of this permit to the Dade County Department of Environmental Resources Management office.

Dade County Department of Environmental Resources Management
Air Quality Management Division
Suite 900
33 Southwest Second Avenue
Miami, Florida 33130-1540
Telephone: 305/372-6925
Fax: 305/372-6954

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155

Fax: 404/562-9163

Homestead City Utilities G.W. Ivey Power Plant

PROPOSED Permit No. 0250013-002-AV Facility ID No. 0250013

12. <u>Statement of Compliance</u>. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of Appendix TV-4, Title V Conditions).}

13. <u>Certification by Responsible Official (RO)</u>. In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

Homestead City Utilities G.W. Ivey Power Plant

Permit No. **0250013-002-AV** Facility ID No. **0250013**

<u>Unregulated Emissions Units and/or Activities</u>. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

For those unregulated emissions units subject to the *General Visible Emissions Standard* at Rule 62-296.320(4)(b), F.A.C., then the provisions of Rule 62-210.700, F.A.C., *Excess Emissions*, are available for purposes of compliance.

The below listed emissions units and/or activities are neither 'regulated emissions units' nor-- 'insignificant emissions units'.

E.U. ID No.	Brief Description of Emissions Units and/or Activity
-002	2070 kW Dual Fuel Diesel Generator #2
-003	2070 kW Dual Fuel Diesel Generator #3
-008	2500 kW Dual Fuel Diesel Generator #8
-009	2500 kW Dual Fuel Diesel Generator #9
-010	2500 kW Dual Fuel Diesel Generator #10
-011	3270 kW Dual Fuel Diesel Generator #11
-012	3270 kW Dual Fuel Diesel Generator #12
-013	2070 kW Dual Fuel Diesel Generator #13
-014	2070 kW Dual Fuel Diesel Generator #14
-015	2070 kW Dual Fuel Diesel Generator #15
-016	2070 kW Dual Fuel Diesel Generator #16
-017	2070 kW Dual Fuel Diesel Generator #17
-018	8800 kW Dual Fuel Diesel Generator #18
-019	8800 kW Dual Fuel Diesel Generator #19
-020	6485 kW Dual Fuel Diesel Generator #20
-021	6485 kW Dual Fuel Diesel Generator #21
-022	Two (2) Cooling Towers for Units Nos. 18 and 19
-023	Various Storage Tanks for Diesel Fuel, Lube Oil and Solvents

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

I.C. Engine, diesel driven air compressor
No. 2 Fuel Oil Storage Tank #1, 250,000 gallons
No. 2 Fuel Oil Storage Tank #2, 250,000 gallons
No. 2 Fuel Oil Day Tank (Unit #2) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #3) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #8) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #9) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #10) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #11) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #12) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #13) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #14) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #15) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #16) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #17) ~ 200 gallons
No. 2 Fuel Oil Day Tank (Unit #18) ~ 500 gallons
No. 2 Fuel Oil Day Tank (Unit #19) ~ 500 gallons
No. 2 Fuel Oil Day Tank (Unit #20) ~ 500 gallons
No. 2 Fuel Oil Day Tank (Unit #21) ~ 500 gallons
No. 2 Fuel Oil Day Tank (primer for tank #1) ~ 175
gallons
Lube Oil Storage Tank - 10,000 gallons
Lube Oil Storage Tank - 10,000 gallons
Lube Oil Storage Tank - 2,000 gallons

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Lube Oil Storage Tank (Unit 18) ~ 2,000 gallons
Lube Oil Storage Tank (Unit 19) ~ 2,000 gallons
Lube Oil Storage Tank (Unit 20) ~ 2,000 gallons
Lube Oil Storage Tank (Unit 21) ~ 2,000 gallons
Lube Oil Storage ~ ten 55 gallon drums
Waste Mineral Spirits Tank - 500 gallons
Two Parts Washers (solvent - aliphatic petroleum
hydrocarbon blend)
Miscellaneous painting activities
Miscellaneous welding activities
Mineral Spirits usage (aliphatic hydrocarbons,
stoddard type)
Storage & use of chemicals solely for water
treatment
Oil/Water Separator

Appendix H-1. Permit History/ID Number Changes

Homestead City Utilities G.W. Ivey Power Plant

Permit No. **0250013-002-AV** Facility No. **0250013**

Permit History:

E.U. ID	Brief Description of Emissions Units	Permit	Issue	Expiration
No.	and/or Activity	Number	Date	Date
-002	2070 kW Dual Fuel Diesel Generator #2	AO13-227815	4/21/93	5/01/98
-003	2070 kW Dual Fuel Diesel Generator #3	AO13-227815	4/21/93	5/01/98
-008	2500 kW Dual Fuel Diesel Generator #8	AO13-227815	4/21/93	5/01/98
-009	2500 kW Dual Fuel Diesel Generator #9	AO13-227815	4/21/93	5/01/98
-010	2500 kW Dual Fuel Diesel Generator #10	AO13-227815	4/21/93	5/01/98
-011	3270 kW Dual Fuel Diesel Generator #11	AO13-227815	4/21/93	5/01/98
-012	3270 kW Dual Fuel Diesel Generator #12	AO13-227815	4/21/93	5/01/98
-013	2070 kW Dual Fuel Diesel Generator #13	AO13-227815	4/21/93	5/01/98
-014	2070 kW Dual Fuel Diesel Generator #14	AO13-227815	4/21/93	5/01/98
-015	2070 kW Dual Fuel Diesel Generator #15	AO13-227815	4/21/93	5/01/98
-016	2070 kW Dual Fuel Diesel Generator #16	AO13-227815	4/21/93	5/01/98
-017	2070 kW Dual Fuel Diesel Generator #17	AO13-227815	4/21/93	5/01/98
-018	8800 kW Dual Fuel Diesel Generator #18	AO13-227815	4/21/93	5/01/98
-019	8800 kW Dual Fuel Diesel Generator #19	AO13-227815	4/21/93	5/01/98
-020	6485 kW Dual Fuel Diesel Generator #20	AC13-29640	4/21/80	12/01/81
	•	AO13-227815	4/21/93	5/01/98
-021	6485 kW Dual Fuel Diesel Generator #21	AC13-29640	4/21/80	12/01/81
		AO13-227815	4/21/93	5/01/98
-022	Two (2) Cooling Towers for Units Nos.	AO13-227815	4/21/93	5/01/98
	18 and 19			
	All of the above.	0250013-001-	5/17/99	5/16/04
	(Initial Title V Permit)	AV		

ID Number Changes (for tracking purposes);

From: Facility ID No. 50DAD130013 To: Facility ID No. 0250013