

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Jorge S. Rodriguez, P.E.
Assistant Director, Water
Miami-Dade Water and Sewer Department
4200 Salzedo Street
Coral Gables, Florida 33146-0316

DEP File No. 0250281-006-AC
PSD-FL-248
John E. Preston WTP, Standby Diesel Engine Generators
Miami-Dade County

Enclosed is Final Permit Number 0250281-006-AC, PSD-FL-248. This permit authorizes the applicant to increase operation of six existing diesel engine generators to provide power generation capacity during periods of load-sharing with the local utility, during power failures and other circumstances including severe weather warnings and events of potential electric utility power losses or reductions. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

C. H. Fancy
for C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6-24-99 to the person(s) listed:

Mr. Robert C. Ready, P.E. *
Ms. Bertha Goldenberg, P.E.
Mr. David Lindberg, P.E., CH2M Hill
Mr. Isidore Goldman, P.E., DEP SED
Mr. Patrick Wong, P.E., DERM
Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

Kari Baker
(Clerk)

6-24-99
(Date)

FINAL DETERMINATION

Miami-Dade Water and Sewer Department
John E. Preston WTP, Standby Diesel Engine Generators
DEP File No. 0250281-006-AC, PSD-FL-248

The Department distributed a public notice package on April 22, 1999 to allow the applicant to increase operation of six existing diesel engine generators at its John E. Preston WTP to provide power generation capacity during periods of load-sharing with the local utility, during power failures and other circumstances including severe weather warnings and events of potential electric utility power losses or reductions. The Preston WTP is located at 110 West 2nd Avenue, Hialeah, Miami-Dade County. The Public Notice of Intent to Issue was published in the Miami Daily Business Review on May 19, 1999.

COMMENTS/CHANGES

No comments were received by the Department from the public, EPA or NPS/FWS.

Comments were received from the applicant by letter and e-mail.

The applicant suggested minor changes to the Technical Evaluation to clarify that the fuel sulfur content shall not exceed 0.05% by weight. The Department does not believe a revision of the Technical Evaluation is needed because the permit clearly states that the sulfur limit is a maximum value.

The applicant suggested that the permit include the word "standby" in the description of the diesel engine generators in Section I and Section III for clarity. The Department will make this change.

The applicant reiterated that the notes associated with specific conditions 2 and 5 should not be construed as additional limitations in the Title V permit issued by the SED. The Department agrees that these are not intended to be limitations and, consequently, should not be included as limitations in the pending Title V permit to be issued by the SE District office. These notes may be included as notes in the Title V permit.

The applicant requested revision of specific condition 7 to clarify that the applicant may demonstrate compliance with the fuel sulfur content limit by receiving records from the fuel supplier that states the sulfur content of the fuel delivered. The Department intended that the applicant could demonstrate compliance in this manner, so it agrees with this request and will clarify the language of this condition.

CONCLUSION

The final action of the Department is to issue the permit with the changes described above.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

Miami-Dade Water and Sewer Department
John E. Preston WTP
4200 Salzedo Street
Coral Gables, Florida 33146-0316

Permit No.	0250281-006-AC, PSD-FL-248
Project	Diesel Engine Generators
SIC No.	4941
Expires:	June 22, 2000

Authorized Representative:

Jorge S. Rodriguez, P.E., Assistant Director, Water

PROJECT AND LOCATION

This permit authorizes Miami-Dade Water and Sewer Department to increase the operation of six existing diesel engine generators, and to modify the engines to comply with the emission limit specified by the BACT determination by retarding the fuel injector timing and installing turbocharger aftercoolers.

This facility is located at 110 West 2nd Avenue, Hialeah, Miami-Dade County. The UTM coordinates are: Zone 17; 571.4 km E and 2856.7 km N.

STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to construct/modify the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

APPENDICES

The attached appendices are a part of this permit:

Appendix BD BACT Determination
Appendix GC General Permit Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

This facility consists of a municipally owned water treatment plant providing potable water to the public. It is adjacent to the applicant's Hialeah Water Treatment Plant, and the diesel engine generators serve both plants.

PROJECT DETAILS

This permitting action is to increase the operation of six existing diesel engine generators, and to modify the engines to comply with the emission limit specified by the BACT determination by retarding the fuel injector timing and installing turbocharger aftercoolers. Emissions units addressed by this permit are:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
006	Standby Diesel Engine Generator #1, EMD model 20-645E4
007	Standby Diesel Engine Generator #2, EMD model 20-645E4
008	Standby Diesel Engine Generator #3, EMD model 20-645E4
009	Standby Diesel Engine Generator #4, EMD model 20-645F4B
010	Standby Diesel Engine Generator #5, EMD model 20-645F4B
011	Standby Diesel Engine Generator #6, EMD model 20-645F4B

All engines are General Motors Electro-Motive Diesel (EMD) generators. Each EMD model 20-645E4 generator has a nominal base load rating of 2.5 megawatts (MW), driven by a 3,600 bhp prime mover. Each EMD model 20-645F4B generator has a nominal base load rating of 2.865 megawatts (MW), driven by a 4,000 bhp prime mover.

REGULATORY CLASSIFICATION

This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

This facility is a major source of hazardous air pollutants (HAPs).

The emissions units included in this project are subject to regulation under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) (version dated 2/5/98).

REVIEWING AND PROCESS SCHEDULE

4/13/98	Received permit application and fee
5/12/98	Department's request for additional information
2/8/99	Received response to request for additional information
2/8/99	Application complete
4/22/99	Distributed Notice of Intent to Issue and supporting documents
5/19/99	Notice of Intent published in the Miami Daily Business Review

SECTION I. FACILITY INFORMATION

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Permit application
- Department's request for additional information
- Applicant's additional information
- EPA's comments dated July 10, 1998
- Department's Technical Evaluation and Preliminary Determination dated April 16, 1999
- Department's Intent to Issue dated April 20, 1999

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

The following specific conditions apply to all emissions units at this facility addressed by this permit.

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, phone number 850/488-0114. All documents related to reports, tests, minor modifications and notifications shall be submitted to the Department's Southeast District office at PO Box 15425, West Palm Beach, Florida, 33416-5425, and phone number 561/681-6600. Copies of all documents should be sent also to the Air Quality Management Division, Miami-Dade County Department of Environmental Resources Management, Suite 900 33 SW Second Avenue, Miami, Florida 33130-1540.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on June 22, 2000. The permittee, for good cause, may request that this construction/PSD permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]

PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)]

BACT Determination: In conjunction with extension of the 18 month periods to commence or continue construction, or extension of the permit expiration date, the permittee may be required to demonstrate

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [40 CFR 52.21(j)(4)]

7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for and receive a Title V operation permit prior to expiration of this permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Southeast District office at PO Box 15425, West Palm Beach, Florida, 33416-5425, and phone number 561/681-6600. Copies of all documents should be sent also to the Air Quality Management Division, Miami-Dade County Department of Environmental Resources Management, Suite 900 33 SW Second Avenue, Miami, Florida 33130-1540. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

EMISSION LIMITING STANDARDS

9. 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% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]
10. Unconfined Emissions of Particulate Matter: [Rule 62-296.320(4)(c), F.A.C.]
 - (a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
 - (b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
 - (c) Reasonable precautions include the following:
 - Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

(d) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

11. General Pollutant Emission Limiting Standards: [Rule 62-296.320(1)(a)&(2), F.A.C.]

- (a) No person shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Note: An objectionable odor is defined in Rule 62-210.200(198), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.]

OPERATIONAL REQUIREMENTS

12. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's district office and, if applicable, appropriate local program. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]

13. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

14. Excess Emissions:

- (a) Excess emissions resulting from start-up, shutdown or malfunction of any emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

- (b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

15. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
16. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
17. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
18. Test Procedures shall meet all applicable requirements of Rule 62-297.310(4), F.A.C. [Rule 62-297.310(4), F.A.C.]
19. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
- (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

20. Required Stack Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. Sampling facilities shall also conform to the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]
21. Test Notification: The owner or operator shall notify the Department's district office and, if applicable, appropriate local program, at least 15 days prior to the date on which each formal compliance test is to begin. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]
22. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

23. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]
24. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
25. Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. [Rule 62-4.130, F.A.C.]

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

26. Excess Emissions Report - Malfunctions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate local program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rule 62-210.700(6), F.A.C.]
27. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the Department's Southeast District office and, if applicable, the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT 0250281-006-AC, PSD-FL-248

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

The following specific conditions apply to the following emissions units after construction:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
006	Standby Diesel Engine Generator #1, EMD model 20-645E4
007	Standby Diesel Engine Generator #2, EMD model 20-645E4
008	Standby Diesel Engine Generator #3, EMD model 20-645E4
009	Standby Diesel Engine Generator #4, EMD model 20-645F4B
010	Standby Diesel Engine Generator #5, EMD model 20-645F4B
011	Standby Diesel Engine Generator #6, EMD model 20-645F4B

All engines are General Motors Electro-Motive Diesel (EMD) generators. Each EMD model 20-645E4 generator has a nominal base load rating of 2.5 megawatts (MW), driven by a 3,600 bhp prime mover. Each EMD model 20-645F4B generator has a nominal base load rating of 2.865 megawatts (MW), driven by a 4,000 bhp prime mover.

[Note: These emissions units are subject to regulation under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) (version dated 2/5/98), and are subject to the requirements of the state rules as indicated in this permit.]

OPERATIONAL REQUIREMENTS

1. Hours of Operation: These emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200, F.A.C., Definitions-potential to emit (PTE)]
2. Diesel Fuel: Each emissions unit shall be fired with diesel fuel with a maximum sulfur content of 0.05 percent, by weight. Fuel consumption of all emissions units combined shall not exceed 1,300,000 gallons of diesel fuel in any consecutive 12-month period. [Rule 62-210.200, F.A.C., Definitions-potential to emit (PTE)]

[Note: At 100% engine load, each model 20-645E4 engine has a fuel consumption of approximately 196.4 gallons per hour, and each model 20-645F4B engine has a fuel consumption of approximately 197.1 gallons per hour, based on a heat input of 27.1 mmBtu/hr and 27.2 mmBtu/hr, respectively, and a 36-degree API diesel fuel higher heating value of 19,640 Btu/lb and density of 7.034 lb/gal.]

3. Operating Procedures: These emissions units shall be properly operated and maintained at all times in a condition to minimize emissions of air pollutants. The owner and operator shall ensure that all facility staff responsible for these emissions units are trained in their operation and maintenance in accordance with the guidelines and procedures as established by the equipment manufacturers. [Rule 62-4.070(3), F.A.C.]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

4. Visible Emissions: These emissions units are subject to the VE requirements of specific condition 9 in Section II of this permit. [Rule 62-296.320, F.A.C.]
5. Emission Limitation, NO_x: Emissions of NO_x are limited as follows:
Emissions of NO_x from each of the model 20-645E4 engines (emissions units 006, 007, 008) shall not exceed 2.15 lb/mmBtu. Emissions of NO_x from each of the model 20-645F4B engines (emissions

SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

units 009, 010, 011) shall not exceed 4.12 lb/mmBtu. [Rule 62-212.400, F.A.C. & BACT Determination for PSD-FL-248]

[Note: This is equivalent to an emission rate of approximately 58.3 lb/hr at 100% engine load for each of the model 20-645E4 engines. This is equivalent to an emission rate of approximately 112.1 lb/hr at 100% engine load for each of the model 20-645F4B engines. Emissions of NO_x are limited to 370 tons per year by the conditions of this permit.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

6. NO_x Emissions Tests: Compliance with the emission limits for NO_x of this permit shall be demonstrated by an annual compliance test using EPA Method 7 or 7E, as described in 40 CFR 60, Appendix A (1997 version), adopted by reference in Rule 62-204.800, F.A.C., and adopted in Rule 62-297.401, F.A.C. Sampling of the exhaust gas shall be via a rake probe placed into the engine exhaust outlet. [Rules 62-4.070(3), 62-204.800, 62-297.340, and 62-297.401, F.A.C.]
7. Fuel Sulfur Content Tests: The owner or operator shall determine the sulfur content of each delivery of diesel fuel received for these emissions units using ASTM D 4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products; and one of the following test methods for sulfur in petroleum products: ASTM D 129-91, ASTM D 2622-94, or ASTM D 4294-90. These methods are adopted by Rule 62-297.440, F.A.C. The owner or operator may comply with this requirement by receiving records from the fuel supplier that indicate the sulfur content of the fuel delivered complies with the sulfur limit of specific condition 2 of this section. [Rules 62-4.070(3) and 62-297.440, F.A.C.]

REPORTING AND RECORD KEEPING REQUIREMENTS

8. Fuel Sulfur Content Records: The owner or operator shall maintain records of sulfur content of each delivery of diesel fuel received for these emissions units, made pursuant to the requirements of specific condition 7 of this section. [Rule 62-4.070(3), F.A.C.]
9. Diesel Fuel Consumption Records: The owner or operator shall make and maintain daily records of diesel fuel consumption for these emissions units at the end of each day. Within ten days of the end of each month, the owner or operator shall make records of monthly diesel fuel consumption from the daily records, shall make records of the consecutive 12 month diesel fuel consumption. [Rule 62-4.070(3), F.A.C.]
10. Records of Maintenance: The owner or operator shall make and maintain records of maintenance on these emissions units sufficient to demonstrate compliance with the operating procedures requirements of specific condition 3 of this section. [Rule 62-4.070(3), F.A.C.]

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

John E. Preston Water Treatment Plant
Miami-Dade Water and Sewer Department
PSD-FL-248 and 0250281-006-AC
Miami-Dade County

1. BACKGROUND

The Miami-Dade Water and Sewer Department (WASD) plans to increase the hours of operation of its six existing standby diesel engine generators at its John E. Preston Water Treatment Plant (WTP) in Miami-Dade County. The units were previously exempt because they were operated as emergency generators. The increase in operation will allow for power generation capacity needed to ensure uninterrupted operation of the WTP. Two different sets of units are present at the Preston plant: three Electro-Motive Diesel generators model 20-645E4 with a nominal base load rating of 2.5 megawatts (MW) each, and three Electro-Motive Diesel generators model 20-645F4B with a nominal base load rating of 2.865 megawatts (MW) each. Each generator is driven by a 3,600 bhp or 4,000 bhp prime mover, respectively. The units burn transportation grade diesel fuel oil with a sulfur content of 0.05 percent or less, by weight. Fuel oil consumption will be limited to 1,300,000 gallons per year. Another existing source of air emissions at this facility is the lime kiln at the adjacent Hialeah WTP which is not part of this project.

WASD has indicated that the maximum annual air pollutant emission rates in tons per year for the six diesel generators, based on consumption of 1,300,000 gallons per year of diesel fuel oil, with a maximum sulfur content of 0.05 percent, by weight, will be:

POLLUTANT	PSD SIGNIFICANCE LEVELS ¹	MAXIMUM EMISSIONS	SUBJECT TO PSD REVIEW?
NO _x	250	370 ²	Yes
CO	100	28.4 ³	No
PM/PM ₁₀	25/15	5.1 ⁴	No
SO ₂	40	4.6 ⁵	No
VOC (NMHC)	40	7.2 ⁶	No

¹ Florida Administrative Code 212.400-2, except for NO_x value which is the PSD major facility criteria.

² Maximum emissions based on operation of model 20-645F4B engines consuming all permitted diesel fuel oil, equivalent to operating each engine 2,245 hours per year. Emissions based on operation of model 20-645E4 engines consuming all permitted fuel are 193 tons per year of NO_x.

³ Maximum emissions based on operation of model 20-645E4 at 25 percent load while firing diesel fuel oil.

⁴ Maximum emissions based on operation of either model engines consuming all permitted diesel fuel oil.

⁵ Maximum emissions based on operation of either model engines consuming all permitted diesel fuel oil (0.05% sulfur by weight).

⁶ Maximum emissions based on operation of either model engines consuming all permitted diesel fuel oil.

Below is the BACT determination proposed by the applicant.

2. DATE OF RECEIPT OF A BACT APPLICATION

April 13, 1998

Additional information received February 8, 1999

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

3. BACT DETERMINATION REQUESTED BY THE APPLICANT

POLLUTANT	EMISSION LIMIT
Nitrogen Oxides	2.15 lb/mmBtu for the model 20-645E4 engines and 4.12 lb/mmBtu for the model 20-645F4B engines, achieved by fuel injection timing retardation and turbocharger aftercooler

The John E. Preston Water Treatment Plant is a major source of air pollution or Title V source. Because emissions of nitrogen oxides from this project are greater than 250 tons per year, it is a major facility with respect to the Prevention of Significant Deterioration (Rule 62-212.400). Because the project will result in a significant increase in nitrogen oxides emissions per Table 62-212.400-2, F.A.C., "Regulated Air Pollutants - Significant Emissions Rates," a BACT determination is required pursuant to Rule 62-212.410, F.A.C.

4. REVIEWER

Joseph Kahn, P.E., prepared BACT determination

5. BACT DETERMINATION PROCEDURE

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as follows:

- *Combustion Products* (e.g., SO₂, NO_x, PM). Controlled generally by good combustion of clean fuels, removal in add-on control equipment.
- *Products of Incomplete Combustion* (e.g., CO, VOC). Control is largely achieved by proper combustion techniques.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis. Although all of the pollutants addressed in

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the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM₁₀, SO₂, H₂SO₄, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

6. BACT POLLUTANT ANALYSIS

For this project the primary pollutant of concern is NO_x, which is a combustion product. Control of NO_x is discussed below. Other combustion products will be controlled through the use of very low sulfur fuel (0.05% sulfur by weight), and through proper engine maintenance and operation. Products of incomplete combustion will also be controlled through proper engine maintenance and operation.

Nitrogen Oxides (NO_x)

Oxides of nitrogen (NO_x) are generated during fuel combustion by oxidation of chemically bound nitrogen in the fuel (fuel NO_x) and by thermal fixation of nitrogen in the combustion air (thermal NO_x). As flame temperature increases, the amount of thermally generated NO_x increases. Fuel type affects the quantity and type of NO_x generated. Generally, natural gas is low in nitrogen. However it causes higher flame temperatures and generates more thermal NO_x than oil or coal, which have higher fuel nitrogen content, but exhibit lower flame temperatures.

NO_x emissions represent a significant portion of the total emissions generated by this project, and must be minimized using BACT. A review of EPA BACT/LAER Clearinghouse (BACT Clearinghouse) information indicates that NO_x emissions at most small facilities are minimized by process control and good combustion practices.

In a diesel engine, injection of fuel into the cylinder starts the combustion process. Retarding the timing of fuel injection until the piston is in its downward motion increases the volume of the combustion chamber, which reduces combustion temperature and pressure, subsequently reducing the formation of NO_x. However, fuel injection timing retardation generally increases black smoke and cold smoke (white smoke during start up) emissions, as well as increasing exhaust temperatures. The increase in exhaust temperatures affect turbocharger performance and may be detrimental to exhaust valve life. A small increase in fuel consumption (about two percent) and a significant increase in particulate emissions (about 25 percent) usually result from the application of fuel injection timing retardation alone to diesel engines. To counteract this problem, it has been demonstrated that the installation of a device to cool the combustion air upstream of the cylinder alleviates most of the negative side effects of IR.

In large bore diesel engines equipped with a turbocharger, the combustion air precooler consists of a heat exchanger, located downstream of the turbocharger, and is typically referred to as an aftercooler. Cooler air box temperatures reduce bulk combustion temperature, which reduces NO_x formation. Because cooler air is denser, the cylinders are charged with a greater mass of air that generally helps reduce emissions of unburned hydrocarbons, carbon monoxide, and particulate matter. Manufacturer's information shows that combining a 4-degree fuel injection timing retardation with the installation of a four pass aftercooler will reduce NO_x emissions by 28 percent and particulate emissions (PM₁₀) by about 7 percent with a slight decrease in fuel consumption (less than 1 percent). The fuel injection timing retardation is easily performed by alteration of the timing sequence of the engine. The installation of the turbocharger aftercooler is also relatively easily accomplished, requiring little engine downtime for completion. Thus, the retrofit is relatively easy to perform, and cost effective as shown below.

The applicant has proposed modification of the combustion process through a combination of fuel injection timing retardation and cooling of combustion air resulting in exhaust temperature reduction. The design specific to these engines includes a 4-degree fuel injection timing retardation and a four pass

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aftercooler circuit. The combination of retarded fuel injection timing and lowered combustion air temperature results in less NO_x formation, and is an effective emissions control technique.

7. BACT DETERMINATION BY DEP

Based on the information provided by the applicant and the information searches conducted by the Department, lower emissions limits can be obtained employing the top-down BACT approach for NO_x.

NO_x Determination

The top-down BACT approach for diesel fired internal combustion engines listed in order from most stringent control to least:

1. Selective Catalytic Reduction (SCR)
2. Combined technologies of fuel injection timing retardation, turbocharger with an aftercooler

The following table summarizes the feasibility of using these control technologies with the EMD models 20-645E4 and 20-645F4B engines for WASD's John E. Preston Water Treatment Plant.

CONTROL TECHNOLOGY	EMISSION REDUCTION (%)	TECHNICALLY FEASIBLE	COST PER TON (\$)	ADVERSE ENVIRON. IMPACTS	ADVERSE ENERGY IMPACTS
SCR with ammonia	85	No	5,169	Yes	N/A
Fuel injection timing retardation; turbo charger aftercooler	28	Yes	174	No	No

SCR is more widely used in Japan and Germany than it is in the United States and the technology is being improved such that the hazards and costs have been reduced. It remains, however, a costly technology for small applications and has potential hazards associated with the use and storage of ammonia. SCR is not generally used with diesel engines of this size. The BACT/LAER database lists only a single facility which uses SCR on diesel engines. SCR was selected in that instance because a local ordinance mandated strict limits on emissions without regard to costs. SCR is not technically feasible for this diesel engine because the exhaust temperatures will be below 550°F for much of the range of normal engine operation. In order for SCR technology to achieve effective reduction of NO_x, the catalyst temperature must be at least 550°F. The exhaust temperature for each engine model is highest at full load, and decreases as the load is reduced. For the model 20-645E4 engines, exhaust temperature ranges from 735°F at full load to 435 °F at 25% load, and for the model 20-645F4B engines, exhaust temperature ranges from 635°F at full load to 335 °F at 25% load. The applicant indicated that average actual operation for 1998 has been only 35% of full load. Thus, the exhaust temperatures, on average, are too low for SCR to be a feasible control technology.

In contrast, the combination of fuel injection timing retardation and turbocharger aftercooling is feasible, as described previously, and as shown above, is cost effective.

For NO_x emissions, the Department accepts the applicant's proposed use of fuel injection timing retardation and cooling of combustion air (aftercooling) as BACT for this project.

The BACT emission levels established by the Department are as follows:

POLLUTANT	EMISSION LIMIT
Nitrogen Oxides	2.15 lb/mmBtu for the model 20-645E4 engines and 4.12 lb/mmBtu for the model 20-645F4B engines, achieved by fuel injection timing retardation and turbocharger aftercooler

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8. COMPLIANCE


Compliance with the NO_x limitations shall be in accordance with the EPA Reference Method 7 or 7E as contained in 40 CFR 60, Appendix A, with sampling via a rake probe.


9. DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Joseph Kahn, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:

for 
C. H. Fancy, P.E., Chief
Bureau of Air Regulation


Howard L. Rhodes, Director
Division of Air Resources Management

06/24/99
Date:

6/24/99
Date:

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X);
 - (b) Determination of Prevention of Significant Deterioration (X); and
 - (c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THRU: Clair Fancy *CLF*
Al Linero *AL*

FROM: Joe Kahn *JK*

DATE: June 23, 1999

SUBJECT: Miami-Dade WASD Preston WTP
0250281-006-AC, PSD-FL-248

Attached for approval and signature is the final PSD permit for the standby diesel generators at Miami-Dade Water and Sewer Department's Hialeah and Preston Water Treatment Plants. The applicant applied on April 13, 1998, to the Department for an air construction permit for its John E. Preston Water Treatment Plant Standby Diesel Engine Generators located at 110 West 2nd Avenue, Hialeah, Miami-Dade County. The permit is to allow the applicant to increase operation of six existing diesel engine generators to provide power generation capacity during periods of load-sharing with the local utility, during power failures and other circumstances including severe weather warnings and events of potential electric utility power losses or reductions. A BACT determination was required for NO_x. NO_x emissions will be controlled by the use of fuel injection timing retardation and turbocharger aftercooling.

Total emissions of pollutants shall not exceed the following annual emission rates in tons per year: NO_x, 370; PM/PM₁₀, 5.1; Sulfur dioxide, 4.6; VOC, 7.2; CO, 28.4.

An air quality impact analysis was conducted. Emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standards.

The public notice requirements have been met by publishing in the Miami Daily Business Review on May 19, 1999.

I recommend your approval and signature.

Attachments

/jk

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Jorge Rodriguez, PE
Miami-Dade W45D
4200 Salzedo St
Coral Gables, FL

33146-0316

4a. Article Number

2 333 618 183

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

6-29-99

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Addressee or Agent)

X

Angelina de Luis

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

2 333 618 183

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Jorge Rodriguez	
Street & Number	
Miami Dade W45D	
Post Office, State, & ZIP Code	
Coral Gables FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

6-24-99

0250281-006-AC

PS Form 3800, April 1995