

# INTEROFFICE MEMORANDUM

**Date:** 17-Jun-1999 04:24pm  
**From:** Richard M. O'Rourke  
richor@co.miami-dade.fl.us

**Dept:**  
**Tel No:**

**To:** Joseph Kahn TAL ( KAHN\_J@A1 )  
**CC:** David Lindberg ( dlindber@ch2m.com )  
**CC:** Bertha Goldenberg ( bmg@co.miami-dade.fl.us )

**Subject:** Re: Preston PSD

Joe,

Here are some my comments with regards to the Draft Title V Air Construction Permit 0250281-006-AC, PSD-FL-248 and related technical documents for the Preston WTP:

Regarding the Technical Evaluation (TE) and Preliminary Determination:

1. The word "maximum" should be inserted before "0.05%" in the last paragraph in Section 6. "Air Pollution Control Techniques", which states "...very low sulfur diesel fuel (0.05% sulfur by weight)" for consistency within the TE and with the application. This may eliminate the SED issuing a compliance requirement of "below 0.05%.." instead of say.. "...not to exceed 0.05% sulfur by weight..".

Regarding the Draft Air Construction Permit 0250281-006-AC, PSD-FL-248:

1. Include the word "Standby" before "Generator" in all of the emissions unit descriptions found in Section I, "Facility Information" and Section III, "Emissions Unit Specific Conditions". This is minor issue at this plant, as there are no other emergency generators or primary generators as there are at other MDWASD plants.

2. The note at the end of Section III, Operational Requirement, condition 2 is acceptable as stated, as long as it is not construed as an additional operational limitation in the Title V operating permit issued by FDEP SED.

3. The note at the end of Section III, condition 5 is acceptable as stated, as long as it is not construed as an additional emission limitation in the Title V operating permit issued by FDEP SED.

4. Revise the last sentence of condition 7 to state, "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." Indicate, show, or demonstrate..

I'm sure no one ever said permit writing was easy. - Richard

Joseph Kahn TAL wrote:

> Richard,  
>  
> The 30 day period for public comments on the Preston PSD permit will expire on  
> Friday, and I'd like to get the final out sometime next week. Did you consider  
> any options to the current language on fuel sulfur content testing and record  
> keeping of specific condition 7 of section III? The permit as written requires  
> WASD to determine the sulfur content of each fuel delivery using ASTM methods,  
> but allows WASD to comply by receiving such records from the fuel supplier. I  
> figured that WASD would demonstrate compliance through records from the  
> supplier. I did not intend that the supplier test each delivery, but could

> rely on analysis performed for the larger volume of oil received at its  
> facility. Perhaps I could revise the last sentence of condition 7 to state,  
> "The owner or operator may comply with this requirement by receiving records  
> from the fuel supplier showing that the sulfur content of the fuel delivered  
> complies with the sulfur limit of specific condition 2 of this section." I  
> don't believe that would be an extreme burden.  
>  
> Let me know how you want to go on this. Otherwise, I'll have to leave it as it  
> exists in the draft permit.  
>  
> -Joe

# INTEROFFICE MEMORANDUM

**Date:** 08-Jun-1999 02:02pm  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Richard M. O'Rourke ( richor@co.miami-dade.fl.us )

**Subject:** Re: Title V John E. Preston

The comments and revised RO pages for Preston arrived today at last! Regarding the comments:

1. I will change the RO.
2. I agree that the hourly heat input rates and fuel consumption rates should not be made a limitation in the Title V permit. Be sure to review the draft Title V permit from the district office regarding this.
3. Specific condition 7 in Section III does allow for WASD to comply with the fuel sulfur records by receiving certification by the fuel supplier, provided the supplier utilizes the ASTM test methods. I see that the condition as written implies that each delivery must be tested, although that was not necessarily the intent if the fuel supplier certifies the sulfur content. I will consider rephrasing this condition so that the supplier may certify the sulfur content of each delivery, without being required to test each load. Do your purchase records specify the sulfur content? Do they mention any test methods?



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MIAMI-DADE WATER AND SEWER DEPARTMENT  
4200 Salzedo Street, Coral Gables, Florida 33146 • Tel: 305-669-3700 • Fax: 669-3788

May 24, 1999

CERTIFIED MAIL  
RETURN RECEIPT  
JUN 07 1999

**RECEIVED**  
BUREAU OF  
AIR REGULATION

Mr. Alvaro A. Linero, P.E.  
Administrator, New Source Review Section  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Comments and Revisions to Draft Air Construction Permit for John E. Preston WTP  
Standby Diesel Engine Generators (DEP File No. 0250281-006-AC, PSD-FL-248)

Dear Mr. Linero:

The Miami-Dade Water and Sewer Department (MDWASD) has received a copy of the above referenced draft construction permit and technical evaluation issued by the Florida Department of Environmental Protection (FDEP). Our comments on the draft permit are as follows:

1. The responsible official for the John E. Preston WTP has changed. Four signed revised permit application sheets are attached.
2. The heat input rates of the diesel engines are acceptable as stated in Section III, Operational Requirement 2. However, the hourly heat input (and fuel consumption) rates noted should not be included as an operational limitation in the Title V operating permit issued by FDEP Southeast District.
3. The fuel sulfur content testing and testing recording requirement found in requirements 7 and 8 create an extreme burden to MDWASD and suppliers. Currently, MDWASD is complying with the fuel maximum sulfur content limitation by purchasing lo-sulfur grade diesel. Requirement 7 should be modified to allow the facility to demonstrate compliance with the maximum sulfur content limitation by maintaining records on the type of fuel delivered as indicated on the shipping manifests by the supplier or suppliers transporter. This method of certification by the supplier is preferred as the testing of each individual tank truck delivery, and references to the testing methods on the shipping manifests presents an undue burden on MDWASD and suppliers.

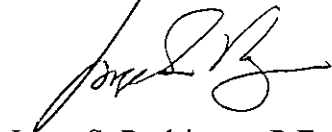
Mr. Alvaro A. Linero, P.E., May 24, 1999

Comments and Revisions to Draft Air Construction Permit for John E. Preston WTP

Page 2 of 2

We request that you revise the draft permit and technical evaluation. If you have any questions regarding the requested changes, please call Ms. Bertha M. Goldenberg, P.E. at (305) 669-5711 or Mr. David Lindberg, P.E. at (619) 687-0110.

Sincerely,



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

JSR/BMG/rmo

Attachments

cc: Isidore Goldman, FDEP Southeast District  
Manuel Delosantos, FDEP/WPB  
Patrick Wong, Miami-Dade County DERM  
David Lindberg, CH2M HILL

cc: J. Kahn, BAR  
EPA  
NPS

**ATTACHMENT A**

FDEP Permit Application Form 62-210.900

(revised pages only)

Draft Permit No. 0250476-002-AC PSD-FL-248

John E. Preston Water Treatment Plant

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official :	
Name :	Jorge S. Rodriguez, P.E.
Title :	Assistant Director, Water
2. Owner or Authorized Representative or Responsible Official Mailing Address :	
Organization/Firm :	Miami-Dade Water & Sewer Dept.
Street Address :	4200 Salzedo Street
City :	Coral Gables
State :	FL
Zip Code :	33146-0316
3. Owner/Authorized Representative or Responsible Official Telephone Numbers :	
Telephone :	(305)669-7602
Fax :	(305)669-5796
4. Owner/Authorized Representative or Responsible Official Statement :	
<p><i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.</i></p>	
Signature	Date

\* Attach letter of authorization if not currently on file.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official :	
Name :	Jorge S. Rodriguez, P.E.
Title :	Assistant Director, Water
2. Owner or Authorized Representative or Responsible Official Mailing Address :	
Organization/Firm :	Miami-Dade Water & Sewer Dept.
Street Address :	4200 Salzedo Street
City :	Coral Gables
State :	FL
Zip Code :	33146-0316
3. Owner/Authorized Representative or Responsible Official Telephone Numbers :	
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Signature	Date

\* Attach letter of authorization if not currently on file.



**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Jorge S. Rodriguez, P.E.  
Title : Assistant Director, Water

2. Owner or Authorized Representative or Responsible Official Mailing Address :

Organization/Firm : Miami-Dade Water & Sewer Dept.  
Street Address : 4200 Salzedo Street  
City : Coral Gables  
State : FL Zip Code : 33146-0316

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (305)669-7602 Fax : (305)669-5796

4. Owner/Authorized Representative or Responsible Official Statement :

*I, the undersigned, am the owner or authorized representative\* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.*

Signature

Date

\* Attach letter of authorization if not currently on file.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official :	
Name :	Jorge S. Rodriguez, P.E.
Title :	Assistant Director, Water
2. Owner or Authorized Representative or Responsible Official Mailing Address :	
Organization/Firm :	Miami-Dade Water & Sewer Dept.
Street Address :	4200 Salzedo Street
City :	Coral Gables
State :	FL
Zip Code :	33146-0316
3. Owner/Authorized Representative or Responsible Official Telephone Numbers :	
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Signature	Date

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**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official :	
Name :	Jorge S. Rodriguez, P.E.
Title :	Assistant Director, Water
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Signature	Date

\* Attach letter of authorization if not currently on file.



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MIAMI-DADE WATER AND SEWER DEPARTMENT  
4200 Salzedo Street, Coral Gables, Florida 33146 • Tel: 305-669-3700 • Fax: 669-3788

May 24, 1999

CERTIFIED: Z 427 642 179  
RETURN RECEIPT

Mr. Alvaro A. Linero, P.E.  
Administrator, New Source Review Section  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RECEIVED**

**MAY 26 1999**

**BUREAU OF  
AIR REGULATION**

Subject: Draft Title V Construction Permit for John E. Preston WTP  
Standby Diesel Engine Generators (DEP File No. 0250281-006-AC, PSD-FL-248)

Dear Mr. Linero:

Attached, please find an original certified proof of publication of the "Public Notice of the Intent to Issue Title V Air Construction Permit" for the referenced facility, as required by Section 403.815, Florida Statutes.

Should you have any questions, please call me at (305) 669-5749.

Sincerely,

Richard M. O'Rourke, P.E.  
Environmental Permits

ro  
Attachment

c: Isidore Goldman, FDEP/WPB  
Manuel Delosantos, FDEP/WPB  
Patrick Wong, Miami-Dade County DERM  
David Lindberg, CH2M Hill, San Diego

EPA  
NPS

Joe Kahn, BAR

## MIAMI DAILY BUSINESS REVIEW

Published Daily except Saturday, Sunday and  
Legal Holidays  
Miami, Dade County, Florida.

STATE OF FLORIDA  
COUNTY OF DADE:

Before the undersigned authority personally appeared Octelma V. Ferbeyre, who on oath says that she is the Supervisor, Legal Notices of the Miami Daily Business Review f/k/a Miami Review, a daily (except Saturday, Sunday and Legal Holidays) newspaper, published at Miami in Dade County, Florida; that the attached copy of advertisement, being a Legal Advertisement of Notice in the matter of

**PUBLIC NOTICE OF INTENT TO  
ISSUE AIR CONSTRUCTION PERMIT  
MIAMI-DADE WATER & SEWER DEPT.  
DEP FILE NO. 0250281-006-AC,  
PSD-FL-248**

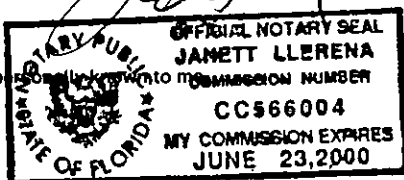
in the .....XXXXX..... Court,  
was published in said newspaper in the issues of  
May 19, 1999

Affiant further says that the said Miami Daily Business Review is a newspaper published at Miami in said Dade County, Florida, and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day (except Saturday, Sunday and Legal Holidays) and has been entered as second class mail matter at the post office in Miami in said Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

19 .....  
Sworn to and subscribed before me this  
May ..... 99  
day of ..... A.D. 19.....

(SEAL)

Octelma V. Ferbeyre personally known to me



## **PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION DEP FILE NO. 0250281-006-AC, PSD-FL-248 MIAMI-DADE WATER AND SEWER DEPARTMENT JOHN E. PRESTON WATER TREATMENT PLANT STANDBY DIESEL ENGINE GENERATORS MIAMI-DADE COUNTY**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Miami-Dade Water and Sewer Department, for the John E. Preston WTP located at 110 West 2nd Avenue, Hialeah, Miami-Dade County. The permit is to allow the application 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. The applicant's mailing address is: 4200 Salzedo Street, Coral Gables, Florida 33146-0316. A Best Available Control Technology (BACT) determination was required for nitrogen oxides (NOx) pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). Nitrogen Oxides (NOx) 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: NOx, 370; PM/PM<sub>10</sub>, 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 maximum predicted PSD NO<sub>2</sub> increment consumed by all sources, including this project, in the nearest Class I (Everglades National Park) and Class II areas will be as follows:

Averaging Time And Class	Allowable Increment (µg/m³)	Increment Consumed (µg/m³)	Percent Consumed
Annual - Class I	2.5	0.84	34
Annual - Class II	25	23.9	96

The Department will issue the Final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S. or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Dept. of Environmental Protection Southeast District 400 North Congress Avenue West Palm Beach, Florida 33401 Telephone: 561/681-6600	Dade County Department of Environmental Resources Mgmt. Suite 600, 33 Southwest 3rd Avenue Miami, Florida 33130-1540 Telephone: 305/372-6925
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The complete project file includes the application, technical evaluations, Draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114 for additional information.