

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 21, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert C. Ready, P.E.
Assistant Director of Treatment Facility
Miami-Dade Water & Sewer Department
4200 Salzedo Street
Coral Gables, Florida 33146-0316

Re: DRAFT Permit No. 0250476-002-AC, PSD-FL-240
Central District Wastewater Treatment Plant

Dear Mr. Ready:

The Department has received your application for an air construction/operation permit for Three 3,600-horsepower (hp) Diesel Engine Driven Generator Sets for your Central District Wastewater Treatment Plant. The application was hand delivered to me on June 25, 1997, when I visited the facility. My Secretary contacted your office a few days later requesting additional copies in accordance with our Rule 62-4.050(2), F.A.C., so that Environmental Protection Agency (EPA), National Park Service (NPS), Dade County Department of Environmental Resources Management (DERM) and our Southeast District (SED) office can conduct a simultaneous review. Although we are continuing to review the application, it remains incomplete until we receive some additional technological information and the extra application copies.

We are in contact with CH2M-Hill on these matters. If you have any questions, please call Syed Arif at 904/488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/sa

cc: Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Isidore Goldman, SED
Mr. Patrick Wong, DERM
Mr. David Lindberg, P.E., CH2M-Hill

Is your RETURN ADDRESS completed on the reverse side?

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3. Article Addressed to

Robert C. Ready, PE
 Assistant Director
 Miami-Dade Water &
 Sewer Dept.
 4200 Sabzedo St.
 Coral Gables, FL 33146-0316

4a. Article Number

P 265 659 242

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

7 24 97

5. Received By: (Print Name)

L. Bayfield

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

6. Signature: (Addressee or Agent)

X L. BAYFIELD

PS Form 3811, December 1994

Domestic Return Receipt

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P 265 659 242

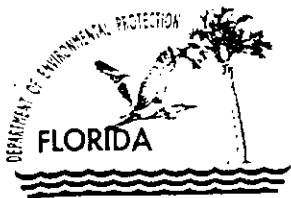
US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	
Robert Ready	
Street & Number	
Miami Dade Water	
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	7-22-97

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 21, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert C. Ready, P.E.
Assistant Director of Treatment Facility
Miami-Dade Water & Sewer Department
4200 Salzedo Street
Coral Gables, Florida 33146-0316

Re: DRAFT Permit No. 0250476-002-AC, PSD-FL-240
Central District Wastewater Treatment Plant

Dear Mr. Ready:

The Department has received your updated application for an air construction/operation permit for Three 3,600-horsepower (hp) Diesel Engine Driven Generator Sets for your Central District Wastewater Treatment Plant. The application was received on July 24, 1997. We need the additional information listed below in order to continue processing this request.

1. Please provide a detailed cost analysis in \$/ton removed based on the vendor information for the chosen control technology (Fuel Injection Timing Retard/Combustion Air Precooling) for NO_x as well as the technology that is economically and technically infeasible (SCR) for this project.
2. Please provide the heat input rate (MMBtu/hr) for each diesel generator and indicate the method of compliance for that heat input rate.
3. Please verify that the g/bhp-hr factor used for the chosen control technology at 100% load is 7.34 for NO_x . Provide the factor as well as emission rates for NO_x if SCR is selected as the control technology.
4. Please indicate if the three diesel generators will be able to comply with the requirements of Chapter 62-297.310(6), F.A.C. If not, how will testing be conducted to show compliance with the NO_x emission limit.
5. The air quality impact analysis did not address the impacts of downwash on the four cogeneration engines or the three diesel blower engines. The impacts of downwash need to be considered for all sources at your facility in order to determine whether any ambient air quality standards or PSD increments are predicted to be exceeded. Please do the modeling with downwash included for these sources and submit these results to the Department.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

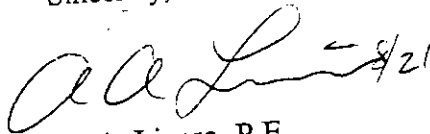
Mr. Robert C. Ready, P.E.

Page Two

Draft Permit No.: 0870004-002-AC, PSD-FL-237

If you have any questions, please call Syed Arif (engineer) or Cleve Holladay (meteorologist) at 904/488-1344.

Sincerely,



A. A. Linero, P.E.
Administrator
New Source Review Section

AAI/sa

cc: Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Isidore Goldman, SED
Mr. Patrick Wong, DERM
Mr. David Lindberg, P.E., CH2M-Hill

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3. Article Addressed to: Robert C. Ready, P.E. Miami-Dade Water & Sewer 4200 Salzedo St. Coral Gables, FL 33146-0316	4a. Article Number P 265 659 443	
5. Received By: (Print Name) L. B. [Signature]	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	
6. Signature: (Addressee or Agent) <input checked="" type="checkbox"/> L. B. [Signature]	7. Date of Delivery 8-25-97	
	8. Addressee's Address (Only if requested and fee is paid)	

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PS Form 3811, Dec 87

Return Receipt

P 265 659 443

US Postal Service
Receipt for Certified Mail
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 Do not use for International Mail (See reverse)

Recipient Name Robert Ready	
Street & Number Miami-Dade	
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	8-22-97

Form 3800, April 1995
 CA 476-102-AC



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 9, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert C. Ready, P.E.
Assistant Director of Treatment Facilities
Miami-Dade Water & Sewer Department
4200 Salzedo Street
Coral Gables, Florida 33146-0316

Re: DEP File No. 0250476-002-AC, PSD-FL-240
PSD Permit for CDWWTP Diesel Generators

Dear Mr. Ready:

The Department sent your office a letter on August 21, 1997 requesting additional information to complete the application for an air construction/operation permit for three 3,600-horsepower (hp) diesel electrical generators for your Central District Wastewater Treatment Plant. We have not received a reply to-date. The generators were constructed some years ago and apparently operated in excess of the hours or emissions triggering the permit requirements for the Prevention of Significant Deterioration of Air Quality (PSD) under Department and Federal regulations.

Please provide the additional information required to complete the application. Otherwise we will initiate procedures leading to the denial of the application. As you are aware, there may be several other diesel engine-driven electric generators at various other installations which may also require additional permitting for the same reasons. We urge you to complete the present application and submit any others required to insure that all comply with the PSD regulations.

If you have any questions regarding this matter, please call Mr. Syed Arif, P.E., at 850/921-8968.

Sincerely,

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

CHF/t

cc: Carlos Rivero de Aguilar, SED
John Renfrow, DERM
Isadore Goldman, SED
Tom Tittle, SED

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Fold at line over top of envelope to the right of the return address

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3. Article Addressed to:
Robert C. Ready, PE
Assistant Director of Treatment
Facilities
Miami-Dade Water & Sewer
4200 Salzedo Street
Coal Gables, FL
33146-0316

4a. Article Number
P 265 659 305

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
3 12 98

5. Received By: (Print Name)
L. Barfield

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

6. Signature: (Addressee or Agent)
X L. Barfield

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 305

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	<i>Robert Ready</i>
Street & Number	<i>Miami-Dade</i>
Post Office, State, & ZIP Code	<i>Water & Sewer</i>
Postage	<i>Coal Gables, FL</i>
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	<i>3-10-98</i>
<i>CG50476-002-AC</i>	
<i>POD-FL-240</i>	

PS Form 3800, April 1995



SERVE • CONSERVE

March 10, 1998

CERTIFIED: Z 427 642 038
RETURN RECEIPT

Mr. Alvaro Linero, P.E.
Administrator
New Source Review Section
Florida Department of Environmental Protection
Tallahassee, FL 32399-2400

RECEIVED
MAR 16 1998
BUREAU OF
AIR REGULATION

RE: DRAFT Permit No. 0250476-002-AC PSD-FL-240 (Re submittal)
Permit No. AC13-81284 (Modification)
Central District Wastewater Treatment Plant

Dear Mr. Linero:

Our revised application to obtain a Prevention of Significant Deterioration (PSD) air construction permit for three standby generators at the above-referenced facility is enclosed along with the ELSA submittal diskettes. This submittal also includes an application to modify our construction permit for four Superior 16GTLB engines and serves as an updated Title V air permit application. An additional fee of \$4,500 is enclosed for the construction permit modification.

We have addressed the issues you raised in your August 21, 1997, letter (Attachment A). A brief discussion of our response to each issue follows.

Item 1. A cost-effectiveness analysis comparison between Fuel Election Timing Retard / Combustion Air Precooling (proposed BACT) and Selective Catalytic Reduction (SCR) is included in Attachment B. Cost-effectiveness for the proposed BACT and SCR alternatives are estimated to be \$126 and \$1,424 per ton NO_x removed, respectively. We claim that technical feasibility problems associated with SCR for our application in combination with its elevated cost-effectiveness makes SCR an unattractive method to control emissions of NO_x.

Item 2. According to information provided by the engine manufacturer (see Attachment 11 of the Air Permit Application-Appendix A), the full load nominal fuel consumption rate of the 20-645E4 engine is 0.375 lb /bhp-hr. This corresponds to a heat input rate of 26.1 million BTU per hour, assuming a gross heating value of 19,340 BTU/lb fuel. No 'method of compliance' testing or monitoring of fuel consumption is proposed in this application. Instead, we propose to monitor generator power output, which is also a reliable indicator of emissions.

Mr. Alvaro Linero, P.E., March 10, 1998

CDWWTP, Title V, PSD Air Construction Permit Application Re submittal

Page 2

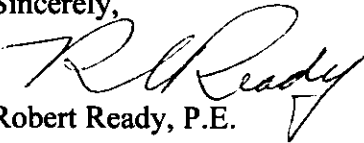
Item 3. Uncontrolled annual emissions of NO, for the proposed level of operation are estimated to be 521 tons (see Attachment B). According to information provided by the engine manufacturer (see Attachment 11 of the Air Permit Application - Appendix A), the 20-645E4 engine emits 10.19 g/bhp-hr power output when tested at 100 percent load. Information is also provided by the manufacturer indicating that adjustment of engine timing (4-degree retarded fuel injection) and installation of turbo charger after coolers will reduce emissions of NOx by 28 percent from uncontrolled levels. It was assumed that SCR would reduce emissions of NO, by 85 percent from uncontrolled levels. Controlled emissions of NOx following installation of proposed BACT would be 7.34 g/bhp-hr and 375 tons per year. Controlled emissions of NOx following installation of SCR would be 1.53 g/bhp-hr and 77.9 tons per year.

Item 4. Regarding requirements for stack sampling facilities, as stated in Chapter 62-297.310(6), Florida Administrative Code, exhaust silencers extending the entire stack length prevent the installation of special sampling ports. We propose to collect exhaust samples through a 'rake probe" apparatus, which composites gas from locations at 33 percent, 50 percent, and 67 percent of the stack diameter. Temporary stack sampling facilities are proposed to satisfy the requirements of part (a) of this rule.

Item 5. The air quality impact analysis has been revised to include effects of building downwash on the superior (cogeneration) engines. The blower engines have been omitted from this application, as they are scheduled to be removed from service in June 1998 upon completion of the oxygenation train at this plant.

We request that all three permits (both construction permits and the Title V permit) be reviewed and issued simultaneously, as minimal construction is necessary and the entire process can be accomplished through a single public notice. If you have any questions about this application, please contact Bertha Goldenberg at (305) 669-5711 or David Lindberg/CH2M HILL at (619) 687-0110.

Sincerely,



Robert Ready, P.E.

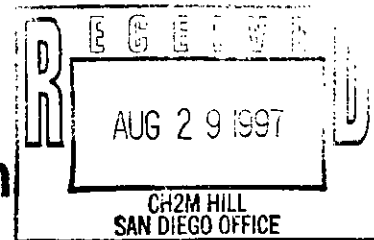
Assistant Director of Treatment Facilities

c: Isidore Goldman, FDEP Southeast District
Patrick Wong, Dade County DERM
David Lindberg, CH2M HILL

ATTACHMENT A
FDEP Letter Request for Information
August 21, 1997



Department of Environmental Protection



Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 21, 1997

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Assistant Director of Treatment Facility
Miami-Dade Water & Sewer Department
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Coral Gables, Florida 33146-0316

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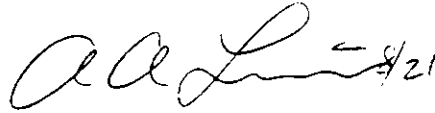
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"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. Robert C. Ready, P.E.
Page Two
Draft Permit No.: 0870004-002-AC, PSD-FL-237

If you have any questions, please call Syed Arif (engineer) or Cleve Holladay (meteorologist) at 904/488-1344.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. A. Linero", with a date "4/21" written at the end of the signature.

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/sa

cc: Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Isidore Goldman, SED
Mr. Patrick Wong, DERM
Mr. David Lindberg, P.E., CH2M-Hill

MIAMI-DADE WATER AND SEWER DEPARTMENT
POOLED CASH FUND
 P.O. BOX 330316 • MIAMI, FLORIDA 33233-0316

CHECK NO.
134046

DATE	PAYEE NAME		
03/04/98	STATE OF FLORIDA DEPARTMENT OF		
INVOICE DATE	INVOICE NUMBER	AMOUNT	PURCHASE ORDER NUMBER
02-27-98	DP002055	4,500.00	DP002055
TOTAL		4,500.00	

The attached check represents the amount due you from Dade County as shown on file in the Clerk's Office. For additional information Contact (305) 665-7471

METROPOLITAN DADE COUNTY, FLORIDA 134046
 MIAMI-DADE WATER AND SEWER DEPARTMENT-POOLED CASH FUND

63-643
 670



VOID AFTER SIX MONTHS
 FIRST UNION NATIONAL BANK
 OF FLORIDA
 MIAMI, FLORIDA 33131

Date	Control Number	Amount of Check
03/04/98	00134046	\$4,500.00

PAY EXACTLY ****4,500 DOLLARS AND 00 CENTS

To
 The
 Order
 Of

STATE OF FLORIDA DEPARTMENT OF
 ENVIRONMENTAL PROTECTION
 2600 BLAIR STONE ROAD
 TALLAHASSEE, FL 32399

METROPOLITAN DADE COUNTY



Joseph J. ... MAYOR
Harvey ... CLERK

⑈ 134046 ⑈ ⑆ 067006432⑆ 2696206503470 ⑈

ATTACHMENT B

Cost Effectiveness Analysis

4-Degree Timing Retard/Combustion Air Precooling vs. Selective Catalytic Reduction

Table B-1

Total Capital Cost Estimates
 Central District WWTP Standby Generators
 Miami-Dade Water and Sewer Department

	4 deg IR + Combustion Air Precoolers		SCR
Direct Costs			
Purchased equipment cost (PEC) ¹	\$	33,103.45	\$ 1,055,000.00
Control device and auxiliary equipment			
Instrumentation			
Sales Taxes (3% of PEC)			
Freight (5% of PEC)			
Direct installation cost ¹	\$	14,896.55	\$ 474,750.00
Foundations and supports			
Handling and erection			
Electrical			
Piping			
Insulation for ductwork			
Painting			
Total Direct Cost	\$	48,000.00	\$ 1,529,750.00
Indirect Costs			
Indirect installation costs ²	\$	10,924.14	\$ 348,150.00
Engineering			
Construction and field expenses			
Contractor fees			
Start-up			
Performance test			
Model study			
Training			
Contingencies ³	\$	6,620.69	\$ 211,000.00
Equipment redesign and modifications			
Cost escalations			
Delays in start-up			
Total Indirect Cost	\$	17,544.83	\$ 559,150.00
TOTAL CAPITAL COST	\$	65,544.83	\$ 2,088,900.00

¹ Includes 3 SCR systems, 3 CEMS, and a 17,000 gallon anhydrous ammonia tank.

² Direct installation cost assumed equal to 45% of PEC.

³ Indirect installation cost assumed equal to 33% of PEC.

⁴ Contingency costs assumed equal to 20% of PEC.

Table B-2

Total Annual Cost Estimates
 Central District WWTP Standby Generators
 Miami-Dade Water and Sewer Department

	Cost	Unit	4 deg IR + Combustion Air Precoolers	SCR
Total Operating Hours (all 3 engines)			12,880	12,880
Direct Annual Costs				
Utilities				
Electricity @ 20 kW ¹	\$ 0.06	kW-hr	\$ -	\$ 15,456.00
Diesel fuel ²	\$ 0.77	gallon	\$ -	\$ 9,612.89
Anhydrous ammonia @ 23 lb/hr each	\$ 275.00	ton	\$ -	\$ 40,733.00
Operating labor				
Operating labor ³	\$ 30.39	hr	\$ -	\$ 4,830.00
Supervising labor ⁴			\$ -	\$ 724.50
Maintenance ⁵			\$ 1,622.42	\$ 51,706.24
Annual compliance test (one engine)			\$ 3,000.00	\$ 3,000.00
Catalyst replacement ⁶			\$ -	\$ 60,650.68
Catalyst disposal ⁷	\$ 0.15	lb	\$ -	\$ 2,880.00
Total Direct Annual Costs			\$ 4,622.42	\$ 189,593.31
Indirect Annual Costs				
Overhead ⁸			\$ 973.45	\$ 31,023.74
Property tax ⁹			\$ 655.45	\$ 20,889.00
Insurance ¹⁰			\$ 655.45	\$ 20,889.00
Administrative charges ¹¹			\$ 1,310.90	\$ 41,778.00
Capital recovery ¹²	0.15582009		\$ 10,213.20	\$ 325,492.59
Total Indirect Annual Costs			\$ 13,808.45	\$ 440,072.33
TOTAL ANNUAL COST			\$ 18,430.87	\$ 629,665.64

¹ Vaporizer and instrumentation electrical requirement, "&G6&" total hours of operation."

² No fuel penalty for IR, fuel penalty of 0.5% for SCR based on 5-inch water backpressure, "&G6&" total" hours of operation, and BSFC = 0.375 lb/bhp-hr.

³ Assumes 3 hrs per 8 hr shift for SCR, "&G6&" hours operation per year. No labor for IR."

⁴ Supervisor labor is 15% of operator labor.

⁵ Maintenance costs are 10% of purchased equipment costs, prorated by the number of hours of operation.

⁶ Catalyst replacement every 8760 hours of operation per engine.

⁷ Assume catalyst density 100 lb/cf. Total weight = (4 modules/engine)(1600 lb/module)(3 engines) = 19,200 lb.

⁸ Overhead charge rate is 60% of maintenance costs.

⁹ Property tax is estimated to be 1% of total capital costs.

¹⁰ Insurance is estimated to be 1% of total capital costs.

¹¹ Administrative costs are estimated to be 1% of total capital costs.

¹² Capital recovery cost is calculated at an interest rate of 9% for a lifetime of 10 years.

Table B-3
 Cost-Effectiveness Comparison
 Central District WWTP Standby Generators
 Miami-Dade Water and Sewer Department

		4 deg IR + Combustion Air Precoolers		SCR
NOx Emissions				
Uncontrolled	tons/yr		520	520
% Reduction			28%	85%
Controlled	tons/yr		375	78
Reduction	tons/yr		146	442
Total Annual Cost	\$000/yr	\$	18.4	\$ 630
Cost-Effectiveness		\$	126	\$ 1,424

Table B-4

Controlled NOx Emissions from Three 20E4 Standby Generators

Central District Wastewater Treatment Plant

Miami-Dade Water and Sewer Department

Compound	Reference	Uncontrolled Emissions			Controlled Emissions			
		Factor (g/bhp-hr)	lb/hr	tons/yr	Control Efficiency	Factor (g/bhp-hr)	lb/hr	tons/yr
SCR	Manufacturer's Data	10.19	80.8	520	85%	1.53	12.1	78.1
Combustion Mods	Manufacturer's Data	10.19	80.8	520	28%	7.34	58.2	374.7



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 17, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert Ready, P.E.
Assistant Director of Treatment Facilities
Miami-Dade Water & Sewer Department
4200 Salzedo Street
Coral Gables, Florida 33146

Dear Mr. Ready:

RE: Revised Application - Central District Wastewater Treatment Plant

The Bureau of Air Regulation received your March 10 letter concerning the above referenced facility. The Department is returning your check number 134046 for \$4,500, which was submitted with your request. There is no additional fee required for this revision of a pending application pursuant to our incompleteness letter dated August 21, 1997.

If you have any questions, please call Syed Arif at (850)488-1344.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/kt

cc: S. Arif, BAR

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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. Robert Ready, P.E. Assistant Director of Treat. Fac. Miami-Dade Water & Sewer Dept. 4200 Salzedo St. Coral Gables, FL 33146		4a. Article Number P265 659 315 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
5. Received By: (Print Name) L. BANFIELD		7. Date of Delivery 3/19/98 8. Addressee's Address (Only if requested and fee is paid)
6. Signature (Date, Name or Agent)		

Thank you for using Return Receipt Service.

Return Receipt

P 265 659 315

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

SENT TO:		Robert Ready
Street & Number		Miami - Dade
Post Office, State, & ZIP Code		Water & Sewer
City		Coral Gables, FL
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		3-17-98

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert C. Ready, P.E.
Assistant Director of Treatment Facility
Miami-Dade Water & Sewer Department
4200 Salzedo Street
Coral Gables, Florida 33146-0316

Re: DRAFT Permit No. 0250476-002-AC, PSD-FL-240
Central District Wastewater Treatment Plant

Dear Mr. Ready:

The Department has received your response to our August 21, 1997 incompleteness letter regarding air construction/operation permit for Three 3,600-horsepower (hp) Diesel Engine Driven Generator Sets. The response also includes a request for modification to your construction permit (AC13-81285) for Four Superior 16GTLB engines at your Central District Wastewater Treatment Plant. The updated application was received on March 16, 1998. The Department will combine the two projects under the same PSD permit and has therefore returned the fee of \$4,500 that was included with the updated application. We will also coordinate with the District Office in issuing the PSD and the Title V operating permit simultaneously. In order to expedite the application, we need the additional information listed below:

1. The response for the cost analysis for SCR technology for the Three 3,600 hp diesel engines includes cost of three SCR's. Please provide the cost analysis in \$/ton removed if the three stacks are combined and a single SCR system is employed to reduce the NO_x emissions to 12.1 lb/hr and 78.1 tons/yr.
2. Table 3-1 of the updated application lists a different emission value for CO at 25% load compared to the original application. Please explain the discrepancy.
3. Please provide past actual emissions for criteria pollutants for the four Superior 16GTLB engines. Also, indicate the future potential emissions for the criteria pollutants for these units. What is the operating hour restrictions on these engines based on the current permit. Rule 62-212.300(3)(a)1 and 2 of the General Preconstruction Review mandates submittal of this information.

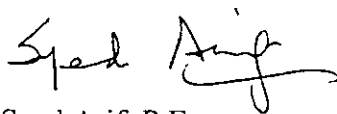
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

4. Please indicate if any physical modifications will be done to the four Superior 16GTLB engines. If so, provide in detail what those modifications will be.
5. In your air quality impact analysis section there was no table summarizing the cumulative PSD increment impact from all sources in the area on the PSD Class I Everglades National Park. You provided modeling results which show that you did a cumulative increment impact analysis and that these values are less than the PSD Class I NO_x increment of 2.5 ug/m^3 . Please submit this summary table in order to complete the air quality impact analysis.

If you have any questions, please call me or Cleve Holladay (meteorologist) at 850/488-1344.

Sincerely,



Syed Arif, P.E.

New Source Review Section

SA/a

cc: Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Isidore Goldman, SED
Mr. Patrick Wong, DERM
Mr. David Lindberg, P.E., CH2M-Hill

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:
 Robert C. Ready, PE.
 Miami Dade Water &
 Sewer Dept.
 4200 Salzedo St.
 Coral Gables, FL
 33146-0316

4a. Article Number
P 265 659 335

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
4 17 98

5. Received By: (Print Name)
L. Banfield

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

6. Signature: (Addressee or Agent)
X L. BANFIELD

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 335

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to:	Robert Ready
Street & Number:	Miami Dade
Post Office, State, & ZIP Code:	Water & Sew Dept. 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 of Date:	4-15-98
	0950476-002-AC
	PSD-FL-240

PS Form 3800, April 1995



SERVE • CONSERVE

MIAMI-DADE WATER AND SEWER DEPARTMENT
4200 Salzedo Street, Coral Gables, Florida 33146 • Tel: 305-669-3700 • Fax: 669-5717

Fax

To: Thomas Tittle	From: Richard O'Rourke
Fax: 1-561-681-6790	Pages: 10 w/cover
Phone: 1-561-681-6760	Date: 05/29/98
Re: Record Keeping at Central District and South District Facilities	CC: Raisa Neginsky

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

● **Comments:**

The following is copy of our responses to the concerns in your letter dated May 7, 1998.

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

SERVE • CONSERVE

May 29, 1998

Mr. Thomas Tittle
Southeast District Office
Florida Department of Environmental Protection
Southeast District
P.O. Box 15425
West Palm Beach, FL 33416

RECEIVED
JUN 04 1998
BUREAU OF
AIR REGULATION

RE: Response to FDEP letter dated May 7, 1998
Record Keeping at Central District and South District Facilities

Dear Mr. Tittle:

PSD-FI-240

The referenced letter was received by the Miami-Dade Water and Sewer Department (MDWASD) on May 11, 1998. Prior to its receipt, action was taken on many of the items contained in the referenced letter. Enclosed, please find our responses to the concerns raised in your letter.

Should you have any questions regarding these responses, please call me at (305) 669-7668 or Mr. Richard M. O'Rourke, P.E. at (305) 669-5749.

Sincerely,



Robert C. Ready, P.E.
Assistant Director,
Treatment Facilities

RCR/RMO/ro

Enclosures

cc: Al Linero, FDEP/TAL
Andrew Nieta, FDEP/WPB

Central District (Va. Key)

Hourly limitations:

During the inspections, the inspector was unable to determine whether or not the four electrical generating units were in compliance with the 8400 hour operation limitation (each). Air Permit A013-244408 specific condition 2.a. states that the "maximum annual hours of operation shall not exceed 8,400 per electrical generating unit (prime mover and associated generator)".

Current logging procedures do not allow the facility to track the total running hours for each engine (i.e. total hours of generating, testing, etc ...). In fact, the operation log for at least one unit showed more hours of operation than the maintenance log. The latter is based on readings of the timing devices (which were required to be installed for each unit) which record the actual time of operation. This indicates that these meters may not be recording properly. Also, some of these logs were not signed or did not indicate when the reading took place, and some pages were missing. In addition, although the replacement date and the last reading of the replaced meters was recorded, the starting reading of the replacement meters was not recorded.

Therefore, these logs are not adequate to assure compliance with the above permit limitation. The data derived from these logs could not verify the compliance status of the units. In accordance with F.S. Ch.403.381, Record and Reports of Operation, "Each licensee [permittee] shall keep and maintain a record of all operations conducted by him or her pursuant to his or her license [permit] showing the method employed, ... the times ... of operation, ... and such other information as may be required by the department and shall report the same to the department at such times as it may require."

In order to provide the Department with the reasonable assurance required to demonstrate compliance with the hourly permit limitation on each electrical generating unit, submit a Standard Procedure document. This document shall specify the record keeping procedure to be followed and documented for each hourly limited unit and the quality assurance procedures which will be followed and documented to assure the recording device is operating properly. Please submit this information to this office no later than May 29, 1998 to avoid possible enforcement action.

Hour meter readings of all major pieces of equipment (which include these engines) are read by plant maintenance personnel on a weekly basis. These hour meter readings, identified by "loop tag" identification numbers, are faxed to the Plant Maintenance Division main offices where data entry and processing is done. These are the logs which were referred to as having missing pages or pages not signed. Daily log sheets are prepared by the operators for each engine when it is operated and they record specific engine operating parameters. These daily log sheets are reviewed and signed by the operators on duty. Unfortunately, time did not allow a detailed review of these daily operating log sheets by your compliance engineer. A review of these daily records might have provided the assurance that the units were in compliance. The generator operators have also been manually keeping separate record of electrical production and hours of production. This record was reviewed and referred to in the letter as not being consistent with the maintenance "loop tag" hour meter readings.

Attached, as exhibit "A", is our proposed interim Standard Procedure to provide the reasonable assurance required to demonstrate compliance with the hourly permit limitation of our operating permit.

EXHIBIT "A"

STANDARD PROCEDURE OPERATING HOUR RECORDS FOR THE CENTRAL DISTRICT WWTP COGENERATION ENGINES AT VIRGINIA KEY

1. Engine hour meter readings are to be taken daily at the beginning of the day by cogeneration plant operators for every cogeneration engine operating at the start of the day and whenever an engine is started or stopped. Both hour meter reading and time that reading was taken shall be entered onto the engine operating log sheet.
2. Engine hour meter readings are to be taken daily at the end of the day by cogeneration plant operators for every cogeneration engine that was operated during the day. Both hour meter reading and time that reading was taken shall be entered onto the engine operating log sheet.
3. Cogeneration plant operators at the end of the day shall calculate the hours of operation based on the elapsed hour meter readings.
4. Cogeneration plant operators shall enter actual engine start and stop times of the cogeneration engines on the respective engine operating log sheet.
5. Cogeneration plant operators at the end of the day shall calculate the hours of operation based on the starting and stop times of the engines.
6. Cogeneration plant operators shall compare the daily hours of operation determined from the start and stop times to the elapsed engine hour meter readings at the end of the day. Unless there is a major discrepancy, the elapsed engine hour meter readings will be considered the actual run time of the engine. Operators are to report any major discrepancies or hour meter failures to Plant Maintenance for repair or replacement of the hour meter.
7. When an hour meter is determined to be defective, the calculated hours of operation based on the engine start and stop time will be considered to be the actual run time of the engine.
8. Maintenance personnel shall notify cogeneration plant operators, prior to starting and stopping any cogeneration engine for maintenance purposes.
9. Both Maintenance and cogeneration plant operators shall note in their respective engine logs and operation log sheet the ending times any hour meters removed and starting times of any hour meters replaced along with the actual time and date of the occurrence.

Central District (Va. Key) continued

Blowers:

During the inspection, the inspector was informed that Blower #2 was going to be retired shortly and the other blowers would be retired sometime this June. These blowers will not need not be tested again if the units are permanently disconnected and the permit is modified to reflect the removal of these blowers. Please note that the muffler system on Blower #2 was broken when it was operated for testing during the inspection. To avoid enforcement, do not operate air pollution units in this manner in the future. Please notify the Department as each unit is disabled. Please provide the Department with notice that Blower #2 is disabled no later than May 29, 1998, so that we may inspect and verify.

All engine driven blowers are to be retired as soon as the plant oxygenation tanks are functionally complete and the MDWASD receives approval to begin operation. Prospective contractors bidding on the removal of these engines have already been on site. Removal of portions of the engine blower intake structure has already begun. Blower #2 has not been run since it was operated for the purpose of testing on April 16, 1998. It is not MDWASD's intent to run blower engine #2 until the hole in the muffler outside the building is repaired, and the engine has been tagged out pending repairs.

MDWASD requests that the FDEP reconsider its request to disable this unit, in that its use may be required to insure proper treatment of wastewater. MDWASD will notify the FDEP when the individual units are retired from service.

South District (Black Point)

Hourly limitations:

This facility has a similar problem with inadequate record keeping as noted during the Department inspection on March 12, 1998. During the inspection, the inspector was unable to determine whether or not the three electrical units were in compliance with the 8400 hour operation limitation (each). Air permit AO-2444406 permit specific condition # 2 a. states that the "maximum total hours of operation shall not exceed 8400 per electrical unit at this facility."

In the logs, the ending hours readings do not usually match the next day's starting hours reading. Because of this, we are not assured that the testing time and idling time, etc., are included in the log book. Also, the last reading of the removed meters was not reflected in the logs at first. Fortunately, the old meters were at the facility and the operator was able to correct this. In addition, each unit at this facility is equipped with two meters, electronic and manual, however, their readings do not match each other. There is no assurance which meter is used to demonstrate compliance and recorded in the log.

In order to provide the Department with the reasonable assurance required to demonstrate compliance with the hourly permit limitation on each electrical unit, submit a Standard Procedure document. This document shall specify the record keeping procedure to be followed and documented for each hourly limited unit and the quality assurance procedures which will be followed and documented to assure the recording device is operating properly. Please submit this information to this office no later than May 29, 1998 to avoid possible enforcement action.

Only a single electronic hour meter is used on the cogeneration engines. The standby generators, which are under permit application, had two hour meters (as described in your letter) on engines #1 through #4, only one meter is being used for recording.

Attached, as exhibit "B", is our proposed interim Standard Procedure to provide the reasonable assurance required to demonstrate compliance with the hourly permit limitation of our operating permit.

EXHIBIT "B"

STANDARD PROCEDURE OPERATING HOUR RECORDS FOR THE SOUTH DISTRICT WWTP COGENERATION ENGINES AT BLACK POINT

1. Engine hour meter readings are to be taken daily at the beginning of the day by cogeneration plant operators for every cogeneration engine operating at the start of the day and whenever an engine is started or stopped. Both hour meter reading and time that reading was taken shall be entered onto the engine operating log sheet.
2. Engine hour meter readings are to be taken daily at the end of the day by cogeneration plant operators for every cogeneration engine that was operated during the day. Both hour meter reading and time that reading was taken shall be entered onto the engine operating log sheet.
3. Cogeneration plant operators at the end of the day shall calculate the hours of operation based on the elapsed hour meter readings.
4. Cogeneration plant operators shall enter actual engine start and stop times of the cogeneration engines on the respective engine operating log sheet.
5. Cogeneration plant operators at the end of the day shall calculate the hours of operation based on the starting and stop times of the engines.
6. Cogeneration plant operators shall compare the daily hours of operation determined from the start and stop times to the elapsed engine hour meter readings at the end of the day. Unless there is a major discrepancy, the elapsed engine hour meter readings will be considered the actual run time of the engine. Operators are to report any major discrepancies or hour meter failures to Plant Maintenance for repair or replacement of the hour meter.
7. When an hour meter is determined to be defective, the calculated hours of operation based on the engine start and stop time will be considered to be the actual run time of the engine.
8. Maintenance personnel shall notify cogeneration plant operators, prior to starting and stopping any cogeneration engine for maintenance purposes.
9. Both Maintenance and cogeneration plant operators shall note in their respective engine logs and operation log sheet the ending times any hour meters removed and starting times of any hour meters replaced along with the actual time and date of the occurrence.

VOC:

Please be reminded that our letter dated June 7, 1997, requested information regarding the VOC emissions resulting from painting activities and solvent use at any one facility and total amount for all MDW&SD facilities. We have not yet received your response. Please provide your best estimate, if more accurate information is not available. Please supply this response by May 29, 1998.

The FDEP Division of Air Resources Management Memo, DARM-PER/V-15, provided guidance to Air Program Administrators and Engineers on the use of the listing of trivial activities listed in the July 3, 1995 Environmental Protection Agency (EPA) memorandum, "Initial Operating Permit Application Compliance Certification Policy,". The EPA listing conditionally includes painting under the category of plant maintenance and upkeep activities as a trivial activity.

MDWASD contends that its painting under the category of plant maintenance and upkeep activities at all of its Title V Facilities is a trivial activity. Enclosed as (EXHIBIT "C") is a tabulation of paint related items issued in Fiscal Year 1995-1996 for the upkeep of all MDWASD facilities. Based on this tabulation, of which the Title V facilities represent a small part, the total emissions are below the thresholds for exemption in Rule 62-213.430(6)(b), F.A.C. As such, painting is included in the application as an exemptible activity.

Emergency generators (all facilities):

Although these units are not yet permitted, the record keeping problems pointed out above should be avoided. The Title V permits will require adequate record keeping to demonstrate compliance with any limitations (hourly, fuel consumption, etc ...) imposed under those permits. Also, please make sure the Title V permit applications address the number and location of the many portable generators operated at each of your facilities. Please address this issue with each person reviewing your Title V applications by May 29, 1998.

The use of trailer mounted generators is primarily limited to emergency use. This is being addressed in an RFI to be issued by FDEP Tallahassee regarding the Alexander Orr, Jr. WWTP in the near future.

EXHIBIT "C"

Paint Related Issues to all WASD Facilities in Fiscal Year 1995-1996

Total Issues	U/I	Part Description	Unit Volume (Gals)	Total Gallons Issued	VOC Content % by volume	Estimated VOC Content Lbs/Gal	Estimated VOC lbs. emitted upon use
125	GL	Acetone, solvent, use as thinner, clea	1.000	125.00		7.3	912.5
282	TU	Adhesive sealant, RTV silicone rubber	0.250	70.53		7.3	514.9
106	PI	Bitumastic, black, super service, 3 T	5.000	530.01	38.60	2.8	1,484.0
6	PL	Bitumastic, super tank solution, black	5.000	30.00	29.00	2.1	63.0
584	TU	Caulking compound, pure white, polyse	0.250	146.06		7.3	1,066.2
29	GL	Cement, Contact, adhesive brushable	1.000	29.00		5.09	147.6
8	PL	Coating, roof, black, 5 GL pail	5.000	40.00		5.09	203.6
18	PL	Emulsion, evergreen, floor latex, 5 G	5.000	90.00	0.08	0.52	46.8
116	CN	Enamel, aluminum/chrome, quick spray	0.063	7.25		2.93	21.2
4	GL	Enamel, cafe noir, polyurethane, oil	1.000	4.00	4.50	2.93	11.7
83	CN	Enamel, chinese red, quick spray, 10	0.063	5.19		2.93	15.2
153	PL	Enamel, EH cork, special floor paint	5.000	765.02		2.93	2,241.5
252	CN	Enamel, flat black, quick spray, 10 oz.	0.063	15.75		2.93	46.1
209	GL	Enamel, glamortex 501, eye rest green	1.000	209.00		2.93	612.4
356	CN	Enamel, gloss black, quick spray, 10	0.063	22.25		2.93	65.2
645	CN	Enamel, Gold, quick spray	0.063	40.31		2.93	118.1
434	CN	Enamel, high gloss equipment yellow	0.063	27.13		2.93	79.5
76	CN	Enamel, royal blue, quick spray, 10 oz.	0.063	4.75		2.93	13.9
450	CN	Enamel, rust preventive, red primer	0.063	28.13		2.93	82.4
397	CN	Enamel, white, quick spray, 10 oz. can	0.063	24.81		2.93	72.7
9	QT	Glazing compound, smooth & ready mixed	0.250	2.25		2.08	4.7
232	PL	Grease coating, no oxide	5.000	1,160.02	0.08	0.52	603.2
841	PL	Latex, acrylic semi-gloss, antique ivory	5.000	4,205.08		2.08	8,746.6
108	GL	Latex, black, 5200 series, white base	1.000	108.00		2.08	224.6
11	GL	Latex, cafe noir, PVA exterior latex	1.000	11.00		2.08	22.9
319	GL	Latex, charcoal gray, 5200 series, white	1.000	319.00		2.08	663.5
256	GL	Latex, dark brown, 5200 series, white	1.000	256.00		2.08	532.5
82	GL	Latex, doeskin, 5200 series, white ba	1.000	82.00		2.08	170.6
32	GL	Latex, effluent brown, 5200 series	1.000	32.00		2.08	66.6
395	GL	Latex, light gray, 5200 series, white	1.000	395.00		2.08	821.6
171	GL	Latex, Medium yellow, 5200 series	1.000	171.00		2.08	355.7
60	GL	Latex, OSHA green, 5200 series, white	1.000	60.00		2.08	124.8
1	GL	Latex, OSHA safety orange, industrial	1.000	1.00		2.08	2.1
2	GL	Latex, OSHA safety purple, 5200 series	1.000	2.00		2.08	4.2
31	GL	Latex, OSHA safety red, 5200 series	1.000	31.00		2.08	64.5
16	GL	Latex, royal blue, 5200 series, white	1.000	16.00		2.08	33.3
14	PL	Latex, traffic marking, black, water	5.000	70.00	0.00	0.009	0.6
537	PL	Latex, white, 5200 series, white base	5.000	2,685.05		2.08	5,584.9
31	GL	Ospho, metal treatment-not a primer	1.000	31.00		2.08	64.5
221	CN	Paint, marking, yellow, spray	0.063	13.81		7.3	100.8
2	PL	Paint, traffic marking, white, solvent	5.000	10.00		7.3	73.0
177	GL	Paint, traffic marking, yellow, latex	1.000	177.00	0.00	0.009	1.6

EXHIBIT "C"

Paint Related Issues to all WASD Facilities in Fiscal Year 1995-1996

Total Issues	U/I	Part Description	Unit Volume (Gals)	Total Gallons Issued	VOC Content % by volume	Estimated VOC Content Lbs/Gal	Estimated VOC lbs. emitted upon use
61	QT	Polyurethane, gloss, clear wood finish	0.250	15.25		5.09	77.6
62	CN	Polyurethane, gloss, clear, coating	0.063	3.88		5.09	19.7
116	QT	Polyurethane, quick dry, primer/sealer	0.250	29.00		5.09	147.6
49	QT	Polyurethane, satin, clear wood finish	0.250	12.25		5.09	62.4
369	GL	Primer, red	1.000	369.00		5.09	1,878.2
1	QT	Putty, white painter's	0.250	0.25		2.08	0.5
20	PL	Roof cement, fibered plastic, PL=5 Gallon	5.000	100.00		5.09	509.0
263	GL	Rust-resistant aluminum, silver brite	1.000	263.00	78.30	5.09	1,338.7
68	GL	Rust inhibitor & primer	1.000	68.00		5.09	346.1
146	GL	Sealant, vinyl patching, elastomeric	1.000	146.00		5.09	743.1
1151	GL	Sealer, acrylic primer and stain kill	1.000	1,151.00		5.09	5,858.6
27	PL	Sealer, protector, elastomeric roof	5.000	135.00	0.01	0.076	10.3
5	GL	Shellac, pigment, stain sealer	1.000	5.00		5.09	25.5
48	GL	Solvent, denatured alcohol, for thinn	1.000	48.00		7.3	350.4
34	QT	Spackling compound, vinyl, ready mixed	0.250	8.50		2.08	17.7
4	QT	Stain, dark walnut	0.250	1.00		5.09	5.1
6	QT	Stain, early american	0.250	1.50		5.09	7.6
12	QT	Stain, golden oak	0.250	3.00		5.09	15.3
6	QT	Stain, special walnut	0.250	1.50		5.09	7.6
22	ST	Wall-nu, brushable gray, UN=1/2 gallon	0.500	11.00		2.08	22.9
38	ST	Wall-Nu, trowelable gray, UN=2 Gallon	2.000	76.00		2.08	158.1
			Total	15,569.54		Total	37,687.18

MDWASD has numerous minor facilities such as pump stations, water storage facilities as well as office buildings in addition to the 5 Major Title V Facilities that are being maintained using these supplies.

Assuming that all of these supplies are divided equally & used among these 5 Title V Facilities and using extremely conservative values for VOC content (7.3 lbs/gal in some products), the estimated uncontrolled emissions related to painting for plant maintenance and upkeep activities is:

$$37,687.18 / 5 = 7,537.44 \text{ lbs}$$

or

3.77 tons



SERVE • CONSERVE

July 8, 1998

RECEIVED

JUL 13 1998

BUREAU OF
AIR REGULATION

Mr. Laxmana Tallum
District Air Program
Florida Department of Environmental Protection
Southeast District
P.O. Box 15425
West Palm Beach, FL 33416

RE: North District Wastewater Treatment Plant
Title V Operating Permit Application (File No. 0250600-002-AV)
Construction Permit Application (File No. 0250600-003-AC)

Dear Mr. Tallum:

I am sending you this letter to inform you that we are currently evaluating changes to the approach of our application for the above referenced facility based on your Request for Additional Information, dated 11 May 1998. As you are aware, we have received a similar request for the South District Wastewater Treatment. We intend to use a consistent approach for all of our facilities, including the 3 PSD permit applications submitted to Tallahassee.

We will provide a written response to the request for additional information for this facility by July 31, 1998. If you have any questions regarding these applications, please call Ms. Bertha M. Goldenberg, P.E. at 305/669-5711 or David Lindberg, P.E. of CH2M HILL at 619/687-0110.

Sincerely,

Robert C. Ready, P.E.
Assistant Director, Treatment Facilities

RCR/RMO/ro

cc: Alvaro Linero, P.E., FDEP Tallahassee
Patrick Wong, Miami-Dade DERM
David E. Lindberg, P.E., CH2M HILL



SERVE • CONSERVE

July 30, 1998

RECEIVED

AUG 04 1998

BUREAU OF
AIR REGULATION


Mr. Laxmana Tallum
District Air Program
Florida Department of Environmental Protection
Southeast District
P.O. Box 15425
West Palm Beach, FL 33416

RE: South District Wastewater Treatment Plant, Title V Operating Permit Application
(File No. 0250520-002-AV), Construction Permit Application (File No. 0250520-003-AC)
North District Wastewater Treatment Plant, Title V Operating Permit Application
(File No. 0250600-002-AV), Construction Permit Application (File No. 0250600-003-AC)

Dear Mr. Tallum:

I am sending you this letter to advise you that the revisions to the applications for the above referenced facilities and our responses to the Requests for Additional Information will be delayed. We should provide the written response to the request for additional information for the facilities by August 14, 1998.

Sincerely,


Richard M. O'Rourke, P.E.
Permitting Engineer

ro

cc: Alvaro Linero, P.E., FDEP Tallahassee
Patrick Wong, Miami-Dade DERM
David E. Lindberg, P.E., CH2M HILL



Department of Environmental Protection

Lawton Chiles
Governor

September 22, 1998

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert C. Ready, P.E.
Assistant Director of Treatment Facility
Miami-Dade Water & Sewer Department
4200 Salzedo Street
Coral Gables, Florida 33146-0316

Re: Central District Wastewater Treatment Plant
DEP File 0250476-002-AC (PSD-FL-240)

Dear Mr. Ready:

On April 15, 1998 the Department requested submittal of additional information to process the referenced application request. To-date we have not received additional information. Please note that per Rule 62-~~5~~055(1): ⁴

"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department. If an applicant requires more than ninety days in which to respond to a request for additional information, the applicant may notify the Department in writing of the circumstances, at which time the application shall be held in active status for one additional period of up to ninety days. Additional extensions shall be granted for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested information shall constitute good cause. Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."

Over ninety days have transpired since our request for additional information. Because the rule provision was not in-effect when we requested the additional information, it will not be used at this time to deny the permit request. The nature of the information is such that a diligent effort would have yielded it by now and would certainly yield it in the next thirty days. Therefore, we are providing Miami-Dade Water & Sewer Department a period of an additional 30 days from the day this letter is received to provide the requested information or show good cause that an extension is required.

If you have any questions regarding this matter, please call Syed Arif at 850/921-9528.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/sa

cc: Mr. Isidore Goldman, DEP/SED
Mr. Patrick Wong, DERM
Mr. David Lindberg, P.E., CH2M-Hill

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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: <i>Mr. Robert C. Roody P. E.</i> <i>Asst. Director of Treatment Facility</i> <i>Miami-Dade Water & Sewer Dept</i> <i>4200 Salsedo St.</i> <i>Coral Gables, FL 33146</i>	4a. Article Number <i>Z 333 612 515</i>	
	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	
5. Received By: (Print Name) <i>J. DANFELD</i>	7. Date of Delivery <i>9 24 98</i>	
6. Signature: (Addressee or Agent) <i>X</i> <i>J. Danfeld</i>	8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Z 333 612 515

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	<i>Robert Roody</i>
Street & Number	<i>Miami Dade Water & Sewer</i>
Post Office, State, & ZIP Code	<i>Coral Gables</i>
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	<i>Z 333 612 515</i>

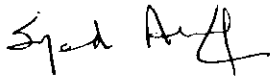
PS Form 3800 April 1995

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy

THRU: Al Linero

FROM: Syed Arif 

DATE: December 28, 1998

SUBJECT: Miami-Dade Water and Sewer Department / Central District
Wastewater Treatment Plant / 0250476-002-AC (PSD-FL-240)

Attached is the Public Notice package for increasing the hours of operation of three existing 2.5 MW each diesel electric generators at the above referenced facility.

The only pollutant that underwent PSD review was NO_x. The diesel generator will be fired with No. 2 fuel oil with a sulfur content of 0.05 percent or less, by weight. The NO_x controls will be timing retardation and turbocharger aftercoolers.

Additionally, the hourly and annual emissions of NO_x for the four digester gas generators (1.2 MW ea.) will be reduced to a level more appropriate for clean burn engines.

I recommend your approval and signature.

SA

Attachments



SERVE • CONSERVE

December 24, 1998

CERTIFIED: Z 427 642 136

RETURN RECEIPT
RECEIVED

Mr. Laxmana Tallum
Air Permitting Engineer
F.D.E.P Southeast District
P.O. Box 15425
West Palm Beach, FL 33416

DEC 31 1998

BUREAU OF
AIR REGULATION

Miami-Dade

RE: Modifications to Title V Air Permit Application, Central District Wastewater Treatment Plant
FDEP File No. 0250476-001-AV

PSD-FI-240

Dear Mr. Tallum:

We would like FDEP to issue the draft PSD and Title V permits for the above-referenced facility concurrently, and we would like to conduct public notice periods for both permits simultaneously. In order to make this possible, we request that our Title V application submitted to your office in June 1996 be amended for consistency with the PSD application submitted to the New Source Review Section in Tallahassee in February 1998.

PSD application No. 0250476-002-AC PSD-FL-240 requests an initial permit to construct three existing 3,600 brake-horsepower (bhp) diesel engines and modifications to construction permit AO13-244408 for the four 1,200 bhp digester gas engines. Please assimilate the conditions requested in this construction permit application directly into our Title V permit application.

If you have any questions about these applications, please contact Bertha Goldenberg at (305)669-5711 or David Lindberg/CH2M HILL at (619)687-0110.

Sincerely,

Robert C. Ready, P.E.
Assistant Director
Treatment Facilities

cc: Syed Arif, P.E. / FDEP Tallahassee
Patrick Wong, P.E. / DERM
David E. Lindberg, P.E. / CH2M HILL

cc: S. Arif, BAR