

*City of Vero Beach*

100 - 17th STREET - P.O. BOX 1389  
VERO BEACH, FLORIDA 32961-1389  
Telephone: (561) 978-5050  
Fax: (561) 978-5090

MUNICIPAL POWER PLANT

**RECEIVED**

**MAY 19 1998**

**BUREAU OF  
AIR REGULATION**

May 12, 1998

Mr. Joseph Kahn, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

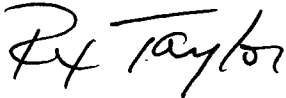
**RE:** City of Vero Beach Title V Permit No. 0610029-002-AV: Request for  
Administrative Permit Correction.

Dear Mr. Kahn:

In accordance with 62-210.360, the City hereby request an Administrative Permit  
Correction to the above mentioned Permit. The City is requesting the addition of ASTM  
Method D5504 under Appendix M, Custom Fuel Monitoring Schedule for Natural Gas.  
Method ASTM D5504 is used for analyzing the natural gas for total sulfurs.

If you have any questions or would like to discuss this further, please contact Mike  
Siefert at 561.978.5020.

Sincerely,



Rex Taylor  
City Manager/Utility Director

Mail Certified Z 389 326 981

Cc: Pete Lindberg  
Mike Siefert



COMMERCIAL TESTING & ENGINEERING CO.  
1212 North 39th Street, Suite 323; Tampa, FL 33605  
Phone: (813)248-6566 Fax: (813)247-2562

From : Michael A. Williams

Office : Tampa

Date : April 28, 1998

Re : NATURAL GAS SULFUR ANALYSIS

To: Mike Siefert  
Vero Beach Power Plant

The test method that determines sulfur compounds in natural gas is ASTM D5504. The method incorporates the use of a GC, gas chromatograph, to identify the sulfur constituents in the sample from a range of 0.01 to 1,000 mg/m<sup>3</sup>.

This is a much more recent publication, 1994, than ASTM D1072, re-approved in 1990. The detection limits for ASTM D1072 are between 25 and 700 mg/m<sup>3</sup>.

Chromatography is more sensitive and limits the amount of indeterminate error. Instrumentation can easily be calibrated with standards to determine the level of accuracy, and using the GC omits the introduction of additional chemicals for reaction purposes. After injecting the sample into the column, the instrument and the detector do most of the work.

ASTM D1072, D3031, D3246 and D4084 are older methodology. D3031 was discontinued according to the 1994 revision.

If you have any questions, feel free to contact me at your convenience.

Member of the SGS Group (Societe Generale de Surveillance)

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Date: 05/04/1998 3:49:26 PM  
From: Amy Hulbert TAL  
Subject: Fuel Sampling for Subpart GG

Hi Susan,

We finally heard back from David McNeal (EPA Region 4) about the ASTM Method D5504 that Vero Beach wants to use for measuring sulfur content of natural gas.

We had determined that Vero Beach probably uses an emission factor of 0.0006 lb SO<sub>2</sub>/mmBtu heat input to calculate their SO<sub>2</sub> emissions for Acid Rain and that therefore, the use of a different ASTM method wouldn't matter for purposes of Title IV.

Part 75 does allow another option for determining SO<sub>2</sub> emissions which involves measuring sulfur content, but most people just use the emission factor. As it turns out, ASTM D5504 is one of the methods allowed by Part 75 for facilities choosing the other option.

David McNeal's position was that if the ASTM method is good enough for Part 75, then it should be ok for Part 60 purposes as well.

Amy

Date: 1/29/98 3:11:37 PM  
From: Al Castro ORL  
Subject: Inquiry Regarding City of Vero Beach Power Plant Cooling Towers  
To: Clair Fancy TAL  
CC: FERRARO C@A1@ORL1  
CC: David York TAL  
CC: Craig Diltz TAL

Thank you for referring the subject inquiry from Mr. Denis Ohlrich to this office via your 1/22/98 memorandum to Vivian Garfein.

Yes, staff from this office, as well as from the Tallahassee Industrial and Domestic Wastewater Sections, are quite familiar with Mr. Ohlrich's concerns regarding the cooling tower in question. Mr. Craig Diltz, Dr. David York, this writer and several other staff individuals have been involved in exhaustive research and written correspondence activities in response to many previous written inquiries and complaints from this individual. His previous correspondences addressed the very same issues forwarded in your memo.

Yesterday evening, Staff from Tallahassee and this office attended a Public Meeting on the Industrial Wastewater Draft Permit for the power plant. Mr. Ohlrich was present and gave oral comments against the draft permit due to those very same issues. Dr. York, also present, did an outstanding job explaining to the citizens present our reuse program and current regulations relative to the use of reclaimed water in cooling towers.

Therefore, we believe it is not necessary to respond to Mr. Ohlrich's latest inquiry since the issues raised therein have already been adequately addressed as noted above.

Joe-  
put in TV permit  
File - *clar*

*Checked*  
*Joe*  
*cyt*

**City of Vero Beach**

# Fax

**To:** Joe Kahn **From:** Mike Siefert

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**Fax:** 850.922.6979 **Pages:** 1

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**Phone:** **Date:** 04/30/98

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**Re:** Vero Beach Proposal

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

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● **Comments:**

Joe,

Please find attached a memo from SGS Commercial Testing and Engineering concerning the natural gas sampling and analysis.

If you have any questions, please contact me at 561.978.5020.

Thanks,

Mike Siefert

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**COMMERCIAL TESTING & ENGINEERING CO.**  
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Date: 12/31/97 2:35:42 PM  
From: Mary Fillingim TAL  
Subject: New Posting  
To: See Below

There is a new posting available on the Florida website.

0610029002AV  
CITY OF VERO BEACH (POWER PLANT)

Final

If you have any questions, please let me know.  
Thanks,

Mary

To: adams yolanda  
To: pierce carla  
To: Barbara Boutwell TAL  
To: Scott Sheplak TAL  
To: Terry Knowles TAL  
To: danois gracy  
To: Elizabeth Walker TAL  
CC: Susan DeVore TAL