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September 24, 1997

Mr. Joseph Kahn, P.E.
Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

SEP 25 1997

BUREAU OF AIR REGULATION

RE: Comments on PROPOSED Title V Permit for Vero Beach No. 0610029-002-AV

Dear Mr. Kahn:

JAMES S. ALVES

BRIAN H. BIBEAU

RALPH A. DEMEO

THOMAS M. DEROSE

FRANK E. MATTHEWS RICHARD D. MELSON

MICHAEL P. PETROVICH DAVID L. POWELL WILLIAM D. PRESTON CAROLYN S. RAEPPLE DOUGLAS S. ROBERTS

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CHERYL G. STUART

KATHLEEN BLIZZARD

ELIZABETH C. BOWMAN

RICHARD S. BRIGHTMAN

PETER C. CUNNINGHAM

Thank you for sending us a copy of the Proposed Title V Permit for Vero Beach. We appreciate your continuing efforts and cooperation in the Title V permit issuance process. Based on a review of the Proposed permit, Vero Beach submits the following comments:

- 1. Vero Beach would like a formal notice of the date that DEP posted the Proposed Permit determination on the World Wide Web for EPA review. This posting date is important as it starts the 55 day clock for the issuance of the Final Permit.
- 2. On page 22 of 37, Condition E-17. The inclusion of this condition regarding excess emission specifically conflicts with Condition E-18, which excludes the applicability of this rule language to this emission unit. As confirmation of our prior conversations, the State excess emission provisions do not apply to Unit 5 because it is subject to the excess emission provisions under the federal New Source Performance Standards. Therefore, Vero Beach requests that Condition E-17 be deleted.

For clarification, Condition F-8 could include the parenthetical "This condition is not **3**. applicable to emissions Unit 005."

Thank you for your continued cooperation and consideration of these comments. If you have any questions, please contact either myself at (850) 222-7500 or Mike Siefert at (561) 978-5020.

Sincerely,

Robert Manning

Attorney for City of Vero Beach Municipal Utilities

Mike Siefert, CVB cc:

Rex Taylor, CVB

Robert Sechen, Esq., CVB

Shuler W. Massey, CVB

Susan C. DeVore, FDEP

Ken Kosky, P.E. Golder

Date:

9/24/97 3:38:44 PM Elizabeth Walker TAL

From: Subject:

Corrected Posting

To:

See Below

There is a new updated posting for 0610029002AV CITY OF VERO BEACH (POWER PLANT) (Proposed permit). The new posting addresses some typographical errors in the file 0610029p.doc.

Please let me know if you have any questions.

Thanks, Elizabeth

To: adams yolanda To: pierce carla

To: Barbara Boutwell TAL To: Scott Sheplak TAL Terry Knowles gates kim To:

To:

Joseph Kahn TAL CC:

Date: From: 9/19/97 3:48:11 PM Elizabeth Walker TAL

Subject: To: New posting See Below

There is a new posting available on the Florida Website.

CITY OF VERO BEACH (POWER PLANT)

0610029002AV Proposed

If you have any questions please let $\ensuremath{\text{me}}$ know. The notification letter is encoded and attached.

Thanks, Elizabeth