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September 11, 1997

RECEIVED

SEP 12 1997

BUREAU OF
AIR REGULATION

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

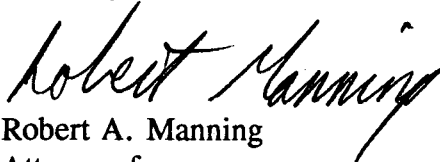
RE: City of Vero Beach Municipal Utilities
Supplemental Comments on DRAFT Title V
Permit No. 0610029-002-AV

Dear Mr. Kahn:

This letter is written to confirm our agreement that, in addition to the other changes to the draft Title V permit that we have already agreed to, an additional condition should be added to the end of Subsection E which would include the language from Rule 62-210.700(1), F.A.C. This condition would provide the clarification that, because Unit 5 contains BACT limits instead of NSPS limits, the state excess emission provision would govern this unit. All other comments and changes previously agreed to should remain the same.

If you have any questions or comments regarding this information, please contact either Mike Siefert at (561) 567-5151 or myself at (850) 425-2263. Thank you again for your cooperation and assistance in processing Vero Beach's Title V Permit.

Sincerely,



Robert A. Manning
Attorney for
City of Vero Beach

cc: Scott Sheplak, P.E. FDEP
Richard M. Siefert, CVB

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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

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

Dear Mr. Kahn:

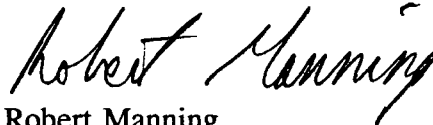
Thank you for sending us a copy of the Proposed Title V Permit for Vero Beach. We appreciate your continuing efforts and cooperation in the Title V permit issuance process. Based on a review of the Proposed permit, Vero Beach submits the following comments:

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.

3. For clarification, Condition F-8 could include the parenthetical "This condition is not 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,

A handwritten signature in cursive script that reads "Robert Manning".

Robert Manning

Attorney for City of Vero Beach Municipal Utilities

cc: Mike Siefert, CVB
Rex Taylor, CVB
Robert Sechen, Esq., CVB
Shuler W. Massey, CVB
Susan C. DeVore, FDEP
Ken Kosky, P.E. Golder