

-91-

City of Vero Beach
100 - 17th STREET - P.O. BOX 1389
VERO BEACH, FLORIDA - 32961-1389
Telephone: (772) 978-5050
Fax: (772) 978-5090

MUNICIPAL POWER PLANT

RECEIVED

NOV 24 2003

BUREAU OF AIR REGULATION

ARNS
UPDATED
12-1-03
TC

November 19, 2003

Mr. Scott M. Sheplak, Administrator
Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

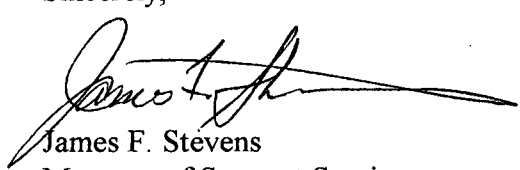
Subject: Title V Permit No. 0610029-006-AV Responsible Official change for Vero Beach
Municipal Power Plant Oris Code 693

Dear Mr. Sheplak,

Please find the enclosed Department of Environmental form DEP 62-213.900(8). The Responsible Official for Vero Beach Municipal Power Plant has changed. Mr. Thomas R. Nason is the Interim City Manager / Utilities Director and is the Primary Responsible Official. Mr. Peter N. Lindberg is being added at this time as an Additional Responsible Official. Mr. Lindberg is the Designated Representative for the City of Vero Beach.

If you have any questions, please contact me at (772) 978-5051.

Sincerely,

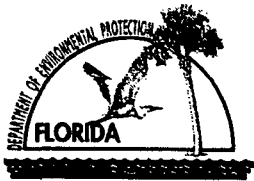


James F. Stevens
Manager of Support Services

Enclosures

Mail Certified 7002 2030 0003 2158 7206

Cc: Peter N. Lindberg
File



Department of Environmental Protection

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NOV 24 2003

Division of Air Resource Management RESPONSIBLE OFFICIAL NOTIFICATION FORM

BUREAU OF AIR REGULATION

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: City of Vero Beach	
2. Site Name: City of Vero Beach Municipal Utilities	2. County: Indian River
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0610029-006-AV	

Notification Type (Check one or more)

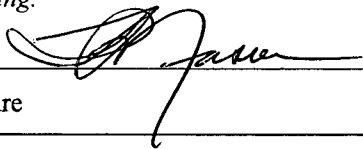
<input type="checkbox"/>	INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	CHANGE:	Notification of change in responsible official(s).
		Effective date of change in responsible official(s) <u>11/19/2003</u>

Primary Responsible Official

1. Name and Position Title of Responsible Official: Thomas R. Nason Interim City Manager / Utilities Director
2. Responsible Official Mailing Address: Organization/Firm: City of Vero Beach Municipal Utilities Street Address: 100 17th Street – P.O. Box 1389 City: Vero Beach State: Florida Zip Code: 32961 - 1389
3. Responsible Official Telephone Numbers: Telephone: (772) 978- 4710 Fax: (772) 978- 4790
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

5. Responsible Official Statement:

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.


Signature

11/20/03
Date

Additional Responsible Official

1. Name and Position Title of Responsible Official:

Peter N. Lindberg

2. Responsible Official Mailing Address:

Organization/Firm: **City of Vero Beach Municipal Utilities**

Street Address: **100 17th Street – P.O. Box 1389**

City: **Vero Beach**

State: **Florida**

Zip Code: **32961 - 1389**

3. Responsible Official Telephone Numbers:

Telephone: **(772) 978 - 5050**

Fax: **(772) 978 - 5090**

4. Responsible Official Qualification *(Check one or more of the following options, as applicable):*

For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official:

2. Responsible Official Mailing Address:

Organization/Firm:

Street Address:

City:

State:

Zip Code:

3. Responsible Official Telephone Numbers:

Telephone: () -

Fax: () -

4. Responsible Official Qualification *(Check one or more of the following options, as applicable):*

For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

The designated representative at an Acid Rain source.

City of Vero Beach

1053 - 20th PLACE - P.O. BOX 1389
VERO BEACH, FLORIDA 32961-1389
Telephone: (772) 978-4710 • Fax: (772) 778-3866
e-mail: citymgr@covb.org

OFFICE OF THE
CITY MANAGER /
UTILITIES DIRECTOR

September 30, 2002

RECEIVED

OCT 10 2002

BUREAU OF AIR REGULATION

Scott M. Sheplak
Administrator
Title V Section
State of Florida, Department of Environmental Protection
Mail Station # 5505
2600 Blair Stone Road
Tallahassee, FL 32399

Subject: Title V Permit Renewal No. 0610029-006-AV: Vero Beach Municipal Power Plant

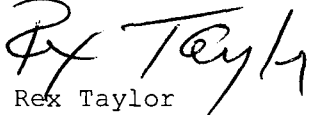
Dear Mr. Sheplak,

The City of Vero Beach is submitting comments on the Draft Title V Permit No. 0610029-006-AV. Subsection D. Miscellaneous (page 4 of 40): This is new language regarding permitting notes. While it is agreed that these "permitting notes" are not conditions, they do provide guidance or clarification of the meaning of conditions. We suggest adding the following language: "The use of "Permitting Notes" throughout this permit are for informational and clarification purposes of specific conditions and not permit conditions."

Condition E.15 and Appendix M. Five years ago in the initial Title V Permit No. 06100029-002-AV Appendix M, a custom fuel monitoring schedule for natural gas was established as a part of the Title V Permit. The City of Vero Beach has followed Appendix M for the testing of natural gas supplied to our Facility. The Draft Permit states " the custom fuel monitoring schedule shall become effective on the date this permit is effective." This language means that the City of Vero Beach would be required to begin anew to perform testing to a schedule that we are now complying with. A substantial change in the fuel quality has not been noticed, therefore the City of Vero Beach is requesting that we continue to monitor the natural gas supplied to this Facility twice per year. Testing will be performed during the first and third quarter of the calendar year as stated in Appendix M (2)(c.). This custom fuel monitoring schedule will only be valid when pipeline supplied natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO₂ emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

If you have any questions, please contact Jim Stevens at (772) 978-5051.

Sincerely,



Rex Taylor
City Manager/Utilities Director/Responsible Official

Mail Certified 7001 1940 0004 0079 1960

Cc: Mr. L. T. Kozlov FDEP Central District
Ken Kosky Golder Associates Inc.
Peter N. Lindberg
James F. Stevens
File

-file-

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

August 27, 2002

RECEIVED

SEP 03 2002

BUREAU OF AIR REGULATION

Mr. Scott M. Sheplak, Administrator
Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

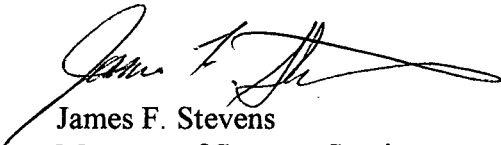
Subject: Title V Permit No. 0610029-005-AV Permit Renewal Vero Beach Municipal Power Plant Oris Code 693

Dear Mr. Sheplak,

On August 19, 2002, the City received a notice that the Title V renewal application for the Vero Beach Power Plant was deemed incomplete. This submittal is a response to the three items identified in your letter of August 14, 2002 to Mr. Rex Taylor, the Responsible Official for the City of Vero Beach. Mr. Taylor has signed the certifications needed for renewal. A revised page 11 of the renewal application, attachment VB-EU3-5-J15 the Phase II Acid Rain Application, attachment VB-FI-C15 the statement of compliance - Title V Source, and attachment VB-EU5-J13 the Compliance Assurance Monitoring Plan for Unit 5 gas turbine are enclosed for your review. In March 2001 the Designated Representative and the Alternate Designated Representative assignments were changed at this facility and the forms were submitted to Region IV. The Designated Representative is Peter N. Lindberg AAR ID number 966 and the Alternate Designated Representative is Richard M. Siefert ALT ID number 618.

If you have any questions, please contact me at (772) 978-5051.

Sincerely,



James F. Stevens
Manager of Support Services

Enclosures

Mail Certified 7001 1940 0004 0079 1922

Cc: Mr. L. T. Kozlov FDEP Central District
4 Copies FDEP Tallahassee
2 Copies Golder Associates Inc.
File

TITLE V RENEWAL APPLICATION
REVISED
PAGE 11

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: [X] Attached, Document ID: <u>VB-FI-C8</u> [] Not Applicable
9. List of Equipment/Activities Regulated under Title VI: [X] Attached, Document ID: <u>VB-FI-C9</u> [] Equipment/Activities On site but Not Required to be Individually Listed [] Not Applicable
10. Alternative Methods of Operation: [] Attached, Document ID: _____ [X] Not Applicable
11. Alternative Modes of Operation (Emissions Trading): [] Attached, Document ID: _____ [X] Not Applicable
12. Identification of Additional Applicable Requirements: [X] Attached, Document ID: <u>VB-FI-C12</u> [] Not Applicable
13. Risk Management Plan Verification: [X] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: <u>June 21, 1999</u>) [] Plan to be submitted to CEPPO (Date required: _____) [] Not Applicable
14. Compliance Report and Plan: [X] Attached, Document ID: <u>VB-FI-C14</u> [] Not Applicable
15. Compliance Certification (Hard-copy Required): [X] Attached, Document ID: <u>VB-FI-C15</u> [] Not Applicable

ATTACHMENT VB-EU3-5-J15
PHASE II ACID RAIN PART APPLICATION

Phase II Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name, State, and ORIS code from NADB

Plant Name City of Vero Beach	State FL	ORIS Code 693
--------------------------------------	-----------------	----------------------

STEP 2 Enter the unit ID#

for each affected unit and indicate whether a unit is being repowered and the repowering plan being renewed by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e.

a	Compliance Plan		d	e
Unit ID#	b	c	New Units Commence Operation Date	New Units Monitor Certification Deadline
	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	Repowering Plan		
3	Yes	NO		
4	Yes	NO		
5	Yes	NO	12/92	1/96
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3

Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that is being repowered, the Repowering Extension Plan form is included.

STEP 4
Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Plant Name (from Step 1)

Standard Requirements

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the Department; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain part application, the Acid Rain part, or an exemption under 40 CFR 72.7, 72.8, or 72.14 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the Department:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7, 72.8 or 72.14, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.

(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or an exemption under 40 CFR 72.7, 72.8, or 72.14 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

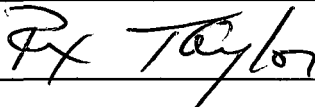
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Mr. Rex Taylor, City Manager / Utilities Director	
Signature 	Date 8/30/02

Acid Rain Program

Instructions for

Phase II Acid Rain Part Application

(40 CFR 72.30 - 72.31 and Rule 62-214.320, F.A.C.)

The Acid Rain Program regulations require the designated representative to submit an Acid Rain part application for Phase II for each source with an Acid Rain unit. A complete Phase II part application is binding on the owners and operators of the Acid Rain source and is enforceable in the absence of an Acid Rain part until the permitting authority either issues an Acid Rain part to the source or disapproves the application.

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the title V permitting authority.

STEP 1 Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4 digit number assigned by the Energy Information Agency (EIA) at the U.S. Department of Energy to power plants owned by utilities. If the plant is not owned by a utility but has a 5 digit facility code (also assigned by EIA), use the facility code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 426-1234 (for ORIS codes), or (202) 426-1269 (for facility codes).

STEP 2 For column "a," identify each Acid Rain unit at the Acid Rain source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation, with unit identification numbers listed in NADB (for units that commenced operation prior to 1993), and with unit identification numbers used in reporting to DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements. NADB is the National Allowance Data Base for the Acid Rain Program, and can be downloaded from the Acid Rain Program Website at "www.epa.gov/acidrain/" or obtained on diskette by calling the Acid Rain Hotline. This data file is in dBase format for use on an IBM-compatible PC and requires 2 megabytes of hard drive memory.

For column "c," enter "yes" only if a repowering technology petition has been approved for the unit by U.S. EPA, an initial repowering extension plan was approved by the title V permitting authority and activated by the designated representative, and a repowering extension plan renewing the original repowering extension plan has been included with the current acid rain part application for that unit.

For columns "d" and "e," enter the commence operation date(s) and monitor certification deadline(s) for new units in accordance with 40 CFR 75.4. If the commence operation date or monitor certification date changes after the Phase II part is issued, the designated representative must submit a request for an administrative correction under Rule 62-214.370(6), F.A.C.

Submission Deadlines

For new units, an initial Phase II part application must be submitted to the title V permitting authority at least 24 months before the date the unit commences operation. Phase II acid rain renewal applications must be submitted at least 6 months in advance of the expiration of the acid rain portion of a title V permit, or such longer time as provided for under the title V permitting authority's operating permits regulation.

Submission Instructions

Submit this form and 1 copy to the appropriate title V air permitting authority. If you have questions regarding this form, contact your local, State, or EPA Regional acid rain contact, or call EPA's Acid Rain Hotline at (202) 564-9620.

**ATTACHMENT VB-FI-C15
STATEMENT OF COMPLIANCE- TITLE V SOURCE**



Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

Annual Requirement	Transfer of Permit	Permanent Facility Shutdown
REPORTING PERIOD*		REPORT DEADLINE**
<u>As of the date of submission of the Title V Renewal Application</u>		<u>Not Applicable</u>

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: City of Vero Beach

Site Name: City of Vero Beach, Municipal Utilities Facility ID No. 0610029 County: Indian River

COMPLIANCE STATEMENT (Check only one of the following three options)

- A.** This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.
- B.** This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:
1. Date of report previously submitted identifying the incident of deviation.
 2. Description of the incident.
- C.** This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:
1. Emissions unit identification number.
 2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
 3. Description of the requirement of the permit condition.
 4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
 5. Beginning and ending dates of periods of noncompliance.
 6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
 7. Dates of any reports previously submitted identifying this incident of noncompliance.

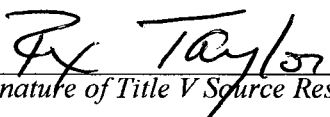
For each incident of deviation, as described in paragraph **B.** above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.



(Signature of Title V Source Responsible Official)

8/30/02
(Date)

Name: Mr. Rex Taylor Title: City Manager / Utilities Director

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.



(Signature of Acid Rain Source Designated Representative)

8-27-02
(Date)

Name: Mr. Peter N. Lindberg Title: Director of Power Resources

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency(EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}

**ATTACHMENT VB-EU5-J13
COMPLIANCE ASSURANCE MONITORING PLAN**

ATTACHMENT VB-EU5-J13**COMPLIANCE ASSURANCE MONITORING PLAN**

Unit 5 Gas Turbine: City of Vero Beach

I. Background**A. Emissions Unit**

Description:	Combined Cycle Gas Turbine
Identification:	Emission Unit ID No. 005
Stack designation:	HRSG Stack
Facility ID No.	0610029
Facility:	City of Vero Beach Municipal Utilities Vero Beach, Florida

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.:	Permit No. 0610029-007-AV
Regulated pollutants:	Nitrogen Oxides (NO _x)
Emission limit:	42 ppmvd at 15% O ₂
Monitoring requirements in permit:	40 CFR Part 75 CEM

C. Control Technology: Water Injection**II. Monitoring Approach**

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table 1.

III. Monitoring Approach Justification

A. Background

This facility consists of 5 regulated emission units that consist of 4 fossil fuel steam generators (Units 1-4) and a combined cycle gas turbine (Unit 5). Unit 5 is rated at a 38 MW with heat inputs of 414 MMBtu/hr when firing natural gas and 455 MMBtu/hr when firing distillate oil. Emissions of NO_x are controlled using dry low-NO_x (DLN) combustors when firing natural gas and water injection when firing fuel oil. The NO_x emission limits are 25 ppmvd corrected to 15% oxygen when firing natural gas and 42 ppmvd corrected to 15% oxygen when firing distillate oil. The emission unit is authorized to co-fire natural gas and distillate oil with a prorated emission rate based on heat input of fuel. The use of DLN when firing only natural gas is an inherent process control and not a "control device" defined under the CAM regulations in 40 CFR Part 64, Section 64.1. The use of water injection when firing oil, or using water injection when co-firing natural gas and oil, is considered a control device under the Part 64 regulations and CAM would apply. This CAM Plan applies to the use of water injection.

B. Rationale for Selection of Performance Indicators

The emission unit is equipped with a CEM meeting the performance requirements of 40 CFR Part 75. Pursuant to 40 CFR 64.3(d) the use of CEMs to meet the requirements of 40 CFR Part 64 is required if a CEM is required pursuant to other authority under the Act or state law. Since a CEM to meet the requirements of 40 CFR Part 75 has been installed and is also required to provide monitoring data pursuant to the Title V permit. A 40 CFR Part 75 CEM presumptively meets the requirements of 40 CFR Part 64.

C. Rationale for Selection of Indicator Ranges

The indicator ranges and averaging times proposed for the indicator ranges are consistent with the emission limiting standards and monitoring requirements. The indicator range will be NO_x emissions of 42 ppmvd corrected to 15% oxygen when firing distillate oil. If co-firing natural gas with distillate oil, a prorated, value calculated based on the heat input of natural gas and distillate oil will be used as the indicator range.

TABLE 1. COMPLIANCE ASSURANCE MONITORING APPROACH, UNIT 5 CITY OF VERO BEACH

	Indicator No. 1	
I. Indicator Measurement Approach	NOx emission rate.	
	NOx emission rate will be monitored by 40 CFR Part 75 CEM.	
II. Indicator Range	An excursion is defined as a NOx emission rate of 42 ppmvd corrected to 15% oxygen on a one-hour average basis, excluding periods of startup, shutdown and malfunction; excursions trigger an inspection and corrective action. The NOx emission rate will be prorated if co-firing occurs.	
III. Performance Criteria A. Data Representativeness B. Verification of Operational Status C. QA/QC Practices and Criteria D. Monitoring Frequency Data Collection Procedure Averaging Period	The CEMs is located in the exhaust stack and provides a direct measurement of the NOx concentration.	
	Not applicable	
	QA/QC practices will follow the requirements of 40 CFR Part 75	
	Measured continuously.	
	Recorded pursuant to 40 CFR Part 75.	
	One-hour average.	

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

JUL 01 2002

June 27, 2002

Florida Department of Environmental Protection
Title V Section
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Attention: Mr. Scott Sheplak

SUBJECT: TITLE V OPERATING PERMIT RENEWAL
CITY OF VERO BEACH MUNICIPAL UTILITIES
PERMIT NO. 0510029-005-AV

Dear Mr. Sheplak:

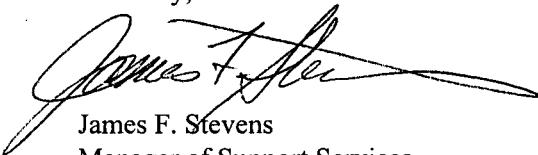
Please find enclosed four (4) copies of an air permit application to renew the Title V operating permit for the City of Vero Beach Municipal Utilities. One (1) additional copy of the application has been sent to the Central District office. The current Title V permit, Permit No. 0510029-005-AV, expires December 31, 2002. As a result, the deadline for the renewal application submittal is July 5, 2002.

Please note that Tank No. 3, a fuel oil storage tank with a 350,000-gallon capacity, has been removed from the facility. The No. 3 fuel tank was an unregulated emission unit that is currently listed in Appendix U-1 of the Title V permit. This tank should be removed from the list of unregulated emission units in Appendix U-1.

In addition, a 750 kW emergency diesel generator will soon be added to the wastewater treatment facility. This generator will operate 4 hours per month for testing and maintenance. The generator is categorically exempt from permitting as per Rule 62-210.300, F.A.C. and should be included in Appendix I-1 of the Title V permit.

Please feel free to contact me at (772) 978-5051 or the engineer on record, Ken Kosky, at (352) 336-5600 if you have questions concerning this application.

Sincerely,



James F. Stevens
Manager of Support Services
Vero Beach Power Plant

Enclosures

cc: L. Kozlov, FDEP - Central District
K. Kosky, Golder Associates