



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 14, 2002

Mr. Rex Taylor
City Manager, Utilities Director
City of Vero Beach Municipal Utilities
100 17th Street
P.O. Box 1389
Vero Beach, Florida 32961-1389

Re: Title V Permit Renewal
File No. 0610029-006-AV
Oris Code No. 693

Dear Mr. Taylor:

On July 1, 2002, the department received your timely renewal application for the referenced plant. However, we must deem your application incomplete for the following reasons:

1. We need you to submit an updated acid rain application for the affected acid rain units. The form in Attachment VB-EU3-J15 was submitted with the initial Title V application in 1996. We need an updated form for this Title V permit renewal application. The new form - **DEP 62-210.900(1)(a), Phase II Permit Application** is posted on this web site address: <http://www.dep.state.fl.us/air/forms/acidrain.htm#acidrain>. Please complete, sign, date and submit an updated form.
2. In your application on page 10 under the Subsection labeled C. Facility Supplemental Information you indicated that the compliance certification was submitted previously therefore, not included. On page 11 you checked item 15. - Compliance Certification as being "not applicable." A compliance certification statement must be signed and dated by the responsible official for this renewal application.
3. We question the applicability of the Compliance Assurance Monitoring (CAM) requirements to Unit 5. In Attachment VB-EU5-J10 CAM Plan you indicate that the use of the NOx CEMS satisfies the requirements of 40 CFR 64 therefore, CAM does not apply. The exemption from CAM provided at 40 CFR 64.2(b)(vi) requires a CEMS to be used to demonstrate continuous compliance with the NOx limit. Permit condition E.13 in FINAL Permit No. 0610029-005-AV does not require the NOx CEMS to be used to demonstrate continuous compliance with the NOx limit. If you wish to use this exemption, the permit can be revised thru this renewal process to clearly specify that the

"More Protection, Less Process"

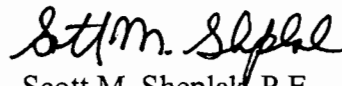
Printed on recycled paper.

Re: Title V Permit Renewal
File No. 0610029-006-AV
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Page 2

NOx CEMS will be used to demonstrate continuous compliance. Otherwise, a CAM plan is required. Please further address CAM applicability to Unit 5.

In order for us to make this permit effective January 1, 2003 for acid rain reasons we request a response from you no later than September 20. If you have any questions, please contact me at 850/921-9532.

Sincerely,



Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/bjf

copy to: Mr. James F. Stevens, Manager of Support Services, Vero Beach Power Plant
Mr. Shuler W. Massey, Designated Representative
Mr. Len Kozlov, P.E., CD
Mr. Ken Kosky, P.E., Golder Associates

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Rex Taylor
 City Manager, Utilities Director
 City of Vero Beach Municipal
 Utilities
 100 17th Street
 P.O. Box 1389
 Vero Beach, Florida 32961-1389

2. Article Number (Copy from service label)

7000 0600 0021 6524 3349

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **GEORGE YOUNG** B. Date of Delivery **8-20-02**

C. Signature **X George Young** Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7000 0600 0021 6524 3349

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To:	
Mr. Rex Taylor	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Name (Please Print Clearly) (to be completed by mailer) Mr. Rex Taylor	
Street, Apt. No., or PO Box No. 100 17th Street - P.O. Box 1389	
City, State, ZIP+4 Vero Beach, Florida 32961-1389	
PS Form 3800, July 1999	
See Reverse for Instructions	

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