

9/29/97

CITY OF LAKE WORTH, T/C

JOE KAHN, SUSAN DEVORE, DEP.

MARGARET JOHNSTONE, BILL MICHAEL, CLW

ANGELA MORRISON, HGSS

DISCUSS DEP LETTER OF SEPT. 23RD

- HEAT INPUT

PTE LIMIT NOT REQUIRED PER A.M.

CAPACITY COULD BE LIMITED BY MW OUTPUT - LW WOULD PREFER. MW - GROSS - LIMIT PER UNIT.

PROBLEMS W/ INCR. EFFICIENCY

POTENTIAL FOR TD HEAT INPUT FOR PURPOSES OF TESTING - ADD SPECIFIC LANGUAGE.

- MW RATING OF COMBINED CYCLE UNIT
NEW PAGES of RO CERT COMING.

- CWD. 6, SECT 4 ^{GWL} VOCs
DEL. b, c. ~~D~~ TO CLEANUP NOT "WANE"

- ANNUAL TESTING

REM. DATES FROM ENF. CONDITIONS TO ALLOW MORE OPERATIONAL FLEXIBILITY. SCHEDULE FLEXIBILITY.

DISCUSS W/ SECT.

- Annual Conditions, SECT. A, B, C, D

E.2 INTO TWO PARTS (A) - 2 HRS SECT A & D

(B) - UNLIM B & C

LW WILL SEND CLARIFYING LANGUAGE

- FUEL SAMPLING

PROPOSED LANG. IS OK BUT NO NEED TO FIX

OK
FED. FISCAL
YEAR.

PPSC
CJ/KNEW
SKINNER

PPSC AND I.6 OF PPSC PA 74-05.
PPSC COULD BE CLARIFIED IF NO COST TO CITY.
INCL. "AUTOMATIC LANGUAGE" AT SAME TIME.

EXEMPT UNITS
WAITING FOR SCOT TO FORMALIZE LANGUAGE.

PPSC COMMENTS
CAND. B.2, C.2, D.2
ENTER MAX ... MAY BE LIMITED ... -DEL- ENTIRELY

~~ENTER~~

C.13 IF A CEMS FOR NOX
TABLE FOR CEMS IF INSTALLED
YES, FOR ACID RAIN

Scott

RECEIVED

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SEP 26 1997

BUREAU OF
AIR REGULATION

In the Matter of an
Application for Permit by:

OGC No. _____

City of Lake Worth Utilities
1900 2nd Avenue North
Lake Worth, Florida 33461

DRAFT Permit No.: 0990045-002-AV
Tom G. Smith Power Plant and
Lake Worth Water Treatment Plant
Palm Beach County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, City of Lake Worth Utilities (Lake Worth) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including November 17, 1997, in which to file a Petition for Administrative Proceedings or a Request for Mediation in the above-styled matter. As good cause for granting this request, Lake Worth states the following:

1. On or about August 20, 1997, Lake Worth received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0990045-002-AV) for the Tom G. Smith Power Plant and Lake Worth Water Treatment Plant in Palm Beach County, Florida. Along with the Intent to Issue, Lake Worth received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. On September 2, 1997 Lake Worth requested an extension until October 3, 1997. While an order officially granting these requests has not yet been issued, representatives from the Department orally agreed to the extensions until October 3, 1997.

3. Based on Lake Worth's preliminary review, the draft permit and associated documents contain several provisions that warrant clarification or correction.

4. Lake Worth has corresponded and is continuing to correspond with the Department in an effort to resolve all issues.

5. This request is filed simply as a protective measure to avoid waiver of Lake Worth's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing or formal mediation.

6. Joseph Kahn with the Department's Bureau of Air Regulation agreed to the extension to and until November 17 on behalf of the Department. Counsel for Lake Worth has attempted without success to contact Jeffrey Brown with the Department's Office of General Counsel regarding this request.

WHEREFORE, Lake Worth respectfully requests that the time for filing of a Petition for Administrative Proceedings or a Request for Mediation in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0990045-002-AV be formally extended to and including November 17, 1997.

Respectfully submitted this 25th day of September, 1997.

HOPPING GREEN SAMS & SMITH, P.A.



Angela R. Morrison, Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500


Attorney for CITY OF LAKE WORTH
UTILITIES

CERTIFICATE OF SERVICE

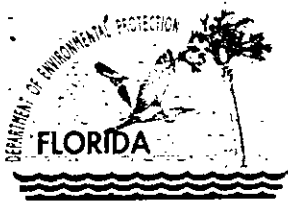
I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following
by U.S. Mail on this 25th day of September, 1997:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

Jeffrey Brown
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600



97998



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 23, 1997

Ms. Margaret Johnstone
Environmental Compliance Officer
City of Lake Worth Utilities
1900 2nd Avenue North
Lake Worth, FL 33461

Re: Comments on DRAFT Title V Permit
File No. 0990045-002-AV
City of Lake Worth Utilities, Palm Beach County

Dear Ms. Johnstone:

We received your comments dated September 10, 1997 on the Draft Title V permit for the City of Lake Worth Utilities. The following comments are in response to your comments, with additional comments where we identified additional changes required to the Draft permit. We included revised language where necessary to clearly show the revisions or changes to the permit. We often did not include the revised language when we agreed with the requested change. Nothing in the following changes will require the publication of a new Notice of Intent to Issue, nor will they prevent the issuance of the Proposed permit.

Address

The facility address will be corrected to 117 College Street.

Alternate Sampling Procedure

The Scrivener's Order dated July 9, 1997 correcting ASP 97-B-01 will be listed on the placard page.

Facility Description

The facility description will be revised as requested.

Heat Input Rates/Limits

The heat input rates are required to establish the capacity of each emissions unit for the purpose of limiting potential emissions and to define capacity for the purposes of compliance testing. It is appropriate to the Title V program to limit potential emissions since the Title V permit is not a mechanism to allow for any increase in emissions. Each individual emissions unit must be limited to achieve these objectives, so a facility cap is not possible. All permits issued by this office for electric utilities carry these capacity limitations. These capacity limitations have been reviewed by EPA and are considered federally enforceable limitations. Thus, we will not delete these limitations, nor will we mark them "not federally enforceable".

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

To clarify that the heat input limitation is not intended to limit the current electric power production capacity of the City, we will change the description of each unit to identify it is "nominally rated" at its MW rating.

Diesel Engine Generators

Although the application refers to these units as diesel generators, we will clarify the description as requested.

MW Rating of Combined Cycle Unit

The application describes the generator nameplate rating of this emissions unit as 20 MW (Section C, Emissions Unit Information Section 6 of 9, page 172) and the Department's database lists this unit as a 20 MW unit. The permit is based on that information, although the PPSC refers to the unit as a nominal 29.5 MW unit. The confusion may result from the steam generator being unfired. We will revise the description as requested upon receipt of a revised application page along with a certification from the RO. The revised description should be included in the Operating Capacity Comment, and the Generator Nameplate Rating should also be revised as needed.

General VOC Standards

Condition 6 will not be changed to remove subparagraphs a. through d. Although not required previously, these conditions are reasonable and are deemed necessary by this permit. Because not required previously, this condition is marked "Not Federally Enforceable".

Unconfined Particulate Matter

Paragraphs a., c. and e. will be revised as requested.

A note will be added to specific condition 7 to clarify that it effectively supersedes condition 57 of Appendix TV-1: "{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4. F.A.C. (condition 57 of Appendix TV-1, dated 8/11/97).}"

"Day One" for Recording and Reporting

This condition was added to all Title V permits issued out of Tallahassee at the request of EPA Region 4. It is meant to address any requirements that refer to a certain number of days after the effective date of the permit. Since this permit refers to calendar events, it would appear the condition is not applicable to this permit. The condition cannot, however, be removed or revised because EPA required it.

EPA Address

1. The address in the Draft permit is the address identified by EPA Region 4. Note that this condition was added to all Title V permits issued out of Tallahassee at the request of EPA Region 4 and the Region 4 staff did not identify a different address for acid rain submittals. Please check with EPA to determine the correct address for acid rain submittals to EPA Region 4.

Annual Testing

The City previously agreed to perform testing of its emissions units by February 28th of each year, and at least one previous Department permit (0990045-001-AO) recognized this agreement in its requirements. A date certain is placed into Department permits to ensure that a source does not fall delinquent on its requirements to test annually each federal fiscal year. The requirement to test annually no later than a given month is reasonable and we believe should remain in this permit. If the previous date is inappropriate, we may be able to accommodate a different date for annual testing.

While Subsection E is titled "Common Conditions", all conditions of the permit that are not in Appendix TV-1 are specific conditions, so the requested clarification is not precisely correct. The common conditions, in other words, are specific conditions of this permit. We propose to not make the requested change.

NOx Testing Requirements

As identified in previous Department permits, conditions A.4, B.12, C.15 and D.9 will be revised to include, "Annual compliance testing while firing oil is not required for units that operated on oil for less than 400 hours in the previous federal fiscal year (ending September 30th)."

Fuel Consumption Records

Condition A.5.b. is intended to demonstrate that the units only burn diesel fuel in accordance with Condition A.1. This condition is not intended to require that separate records be made for fuel consumption of each unit. Specific condition A.5.b. will be changed to read, "The total fuel consumption of all five units combined each calendar month."

Common Conditions for Sections A, B, C and D

Specific condition E.2 will be amended to include startup, shutdown or malfunction of any emissions unit, to match the language of Rule 62-210.700(1), F.A.C. Specific condition E.3 will include the parenthetical language: (This condition does not apply to emissions units 001 - 005, 006 and 011.)

Specific conditions E.3, E.9, E.10, E.11 and E.18 will include clarifying language to identify applicability.

Specific conditions A.6 and D.10 will be changed to the following:

A.6/D.10. This emissions unit is also subject to conditions E.1 through E.19, **except for conditions E.3, E.10, E.11 and E.18, contained in Subsection E. Common Conditions.**

Conditions B.13 and C.17 will be changed to the following:

B.13. This emissions unit is also subject to conditions E.1 through E.19, **except for E.9 and E.18, contained in Subsection E. Common Conditions.**

C.17. This emissions unit is also subject to conditions E.1 through E.19, **except for E.9, contained in Subsection E. Common Conditions.**

Fuels

Note that the current language ("any combination") includes the combinations of 100% fuel or gas. However, this minor clarification will be added per your request.

Fuel Sampling and Analysis

You are correct in stating fuel quantity and density are not relevant to demonstrating compliance with the fuel sulfur limitations of this permit. However, condition I.6. of PPSC PA 74-05 requires record keeping for Units S-3, S-4 and GT-2/S-5 to enable calculations of sulfur dioxide emissions. Condition B.10 is not derived from the PPSC conditions and shall be revised to (note also that the ASTM methods have been updated to be consistent with other permits issued by this office):

B.10. Fuel Sampling & Analysis - Sulfur. For this emissions unit, the following fuel sampling and analysis protocol shall be used to demonstrate compliance with the fuel sulfur limitation of specific condition B.7 of this permit:

- a. Sample the as-fired fuel oil each day fuel oil is fired.
- b. Composite the daily samples and each month determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a representative sample of the composited as-fired fuel oil.

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

Conditions C.12 and D.7 shall be revised as follows:

C.12./D.7. Fuel Sampling & Analysis - Sulfur. For each emissions unit, the following fuel sampling and analysis protocol shall be used to demonstrate compliance with the fuel sulfur limitation of specific condition C.8/D.4 of this permit:

- a. Sample the as-fired fuel oil each day fuel oil is fired.
- b. Composite the daily samples and each month determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a representative sample of the composited as-fired fuel oil. Each composite sample shall also be analyzed for heating value.
- c. Record monthly the amount of each fuel fired, and maintain records of the monthly analyses of the heating value of each fuel, and the percent sulfur content by weight of each fuel, to enable calculations of sulfur dioxide emissions.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and PPSC PA 74-05]

The changes to conditions C.12 and D.7 will automatically cause condition I.6. of PPSC PA 74-05 to be revised to match.

Sootblowing/Load Change

The referenced excess opacity provisions (greater than 60%) are only available to units which have or are committed to have continuous opacity monitors, whether or not these monitors are required by some other rule such as the Acid Rain program. To resolve the uncertainty regarding these monitors for Unit S-4 we will change the last paragraph and note of specific condition C.5 as follows:

(The following paragraph is applicable to emissions unit 009 (Unit S-3) and will become applicable to emissions unit 010 (Unit S-4) only upon installation of an operational continuous opacity monitor at Unit S-4.) Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed by this condition.

[Rule 62-210.700(3), F.A.C., Note: Unit S-3 has an operational continuous opacity monitor. Unit S-4 may install an operational continuous opacity monitor in the future, and at that time be allowed visible emissions greater than 60% opacity pursuant to Rule 62-210.700(3), F.A.C., and specific condition C.5 of this permit.]

NOx CEM

The requested changes to specific condition C.16 to match the rule requirements and clarify that CEMS data need not be regularly submitted to the Department will be made.

Stack Sampling Facilities

The requested change to specific condition E.16 will be made. We agree with your conclusion that installation of permanent facilities will be burdensome at this facility.

Annual Statement of Compliance

To clarify that condition A.4 in the Acid Rain subpart is generally applicable, it will be moved to Section II, Facility-wide Conditions, and numbered condition 10.

Fast-Track Revisions of Acid Rain Parts

We agree that this rule is applicable regardless of its inclusion into the permit. However, we will include the following condition in the Acid Rain Section IV, which will replace the existing condition A.4 which is being moved as described above:

A.4. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62- 214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts.

Exempt Units

Changes that are made by the Department prior to the issuance of the final permit to Appendix E-1 will be incorporated into the City's permit. Changes made after that may be incorporated at the City's request as an administrative permit correction.

Federal Enforceability

Changes that are made by the Department prior to the issuance of the final permit of the permit to Appendix TV-1 will be incorporated into the City's permit. Changes made after that may be incorporated at the City's request as an administrative permit correction.

Permit History

The permit history has been revised to reflect the NO_x RACT operation permit and the related PPSC revisions.

Summary Tables

Table 1-1 will not be changed as requested because the tables are not an enforceable part of this permit. Note that there is a note for all tables on page S6 of 10 that states that the "Equivalent Emissions" listed are for informational purposes only.

The frequency base date for Table 2-1 will not be deleted. The Department requires annual testing by this date as described above, and its purpose is evident to compliance staff.

Table 2-1 for emissions units 009 and 010 for sulfur dioxide CMS will be changed to "no^a" with the following footnote:

Note for EU 009 & 010:

a A continuous monitor for SO₂ is operated by the City for emissions unit 009. Compliance with the fuel sulfur limitation is not via the continuous monitor.

The pollutant column for Table 2-1 for emissions units 006 and 011 will be changed to note that the sulfur dioxide information is for emissions unit 011 only.

Palm Beach County Comments

We had additional comments from the Palm Beach County Health Department that will result in the following additional changes.

The Health Department commented that the listing of emissions units in Subsections A and B is redundant. We will revise the listing in Subsection A to the following:

This facility is an electric power generating plant and an adjacent potable water treatment facility and consists of:

Five 2000 kW diesel engine generators; Fossil Fuel Steam Generating Units 1 (S-1), 3 (S-3) and 4 (S-4); Gas Turbine # 1, (GT-1); and a Combined Cycle Unit, (GT-2/S-5).

We will revise the Health Department's ZIP code to 33402-0029 in specific condition 9 of Section II.

The Health Department would like a reference to the general VE standard for each regulated emissions unit that does not have a specific VE limit. We will add a note in Subsections A and D, respectively, under **Emission Limitations and Standards** as follows:

{Note: Emissions units 001 through 005 are also subject to the visible emissions standard of specific condition 3 of this permit.}

{Note: Emissions unit 006 is also subject to the visible emissions standard of specific condition 3 of this permit.}

The Health Department requests the reference to the operating rate limitation after testing be made more clear. Specific conditions B.2, C.2 and D.2 will be changed to, "The maximum heat input may be further limited as a result of stack testing. See specific condition E.14."

The Health Department agrees with monthly fuel compositing and recording fuel usage, density and sulfur content monthly. The Department and the City have agreed to continue monthly compositing and to record fuel usage, density and sulfur content on a monthly basis.

The Health Department commented that Unit S-4 must install a NO_x monitor pursuant to the Acid Rain program, and that NO_x monitor, when installed, should become the compliance method under the NO_x RACT rule. The Department understands the City may pursue with EPA an exemption from the Acid Rain program for Unit S-4, but the Health Department's comment is valid. The Health Department, in another comment, requests that a description of the continuous monitors maintained for each unit be included in the description. The following changes will be made to Subsection C and Table 2-1.

{Permitting note(s): The emissions units are regulated under Acid Rain, Phase II, Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators The permittee reported it operates the following continuous monitors for Unit S-3: SO₂, NO_x, CO₂, flow, visible emissions, and temperature.}

C.13. NO_x Testing. Compliance with the NO_x emission limitation shall be demonstrated by annual emission testing in accordance with EPA Test Method 7E, for emissions unit 010. If a continuous emission monitoring system (CEMS) is installed at emissions unit 010, compliance shall then be demonstrated by the CEMS. Compliance with the NO_x emission limitation shall be demonstrated by a CEMS for emissions unit 009. See specific conditions C.15 and C.16. [Rule 62-296.570, F.A.C.]

C.15. Annual NO_x Tests Required - Unit 4 (S-4, Emissions Unit 010). For emissions unit 010, emission testing for NO_x shall be performed annually, no later than February 28th of each year, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service. Annual compliance testing while firing oil is not required for units that operated on oil for less than 400 hours in the previous federal fiscal year (ending September 30th).

Should the owner or operator install a continuous emission monitoring system (CEMS) for NO_x emissions at emission unit 010, compliance with the NO_x limitation shall be demonstrated with the CEMS. Compliance shall be based on a 30-day rolling average. The CEMS shall be properly maintained and operated and shall meet the performance specifications of 40 CFR 60, Appendix B, or 40 CFR 75. The CEMS data shall be maintained on site for inspection by the Department.

[Rules 62-4.070(3), 62-213.410, F.A.C. and 62-296.570(4)(a)3. & 4.]

Table 2-1 for emissions units 009 and 010 will be changed to read, "Yes (for Acid Rain)" in the CMS column for SO₂, and the table for NO_x for emissions unit 010 will be revised:

NOx (EU 010)	Oil, Natural Gas	EPA Test Method 7E (If CEMS installed see next row)	Annual	February 28th	3 hours	No	C.13 & C.15
NOx (EU 010)	Oil, Natural Gas	CEMS (If installed)	Continuous			Yes	C.13 & C.15

The Health Department commented on the fact that emissions unit 011 has a fuel sulfur limit established by applicable requirement, while emissions unit 006 does not, even though emissions unit 006 has a higher heat input rating. The Department made no changes as a result of this comment.

The Health Department questioned whether specific condition D.5 should include a means to prorate the emission limitation when a combination of fuels are fired, and what effect this might have on the compliance demonstration. (This, of course, is only applicable to emissions unit 011 which can fire a combination of fuels.) The Department and Health Department have subsequently agreed that no changes to this specific condition are necessary since the unit ordinarily burns natural gas and testing is required on both fuels when fuel oil is fired for less than 400 hours in a federal fiscal year.

In Table 1-1 for emissions units 006 and 011, under the Standard(s) column, the order of NOx standards for oil and gas will be reversed to maintain consistency with the Fuel(s) column.

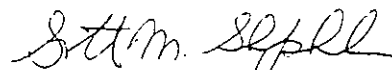
In Table 2-1 for emissions units 007, 009 and 010, and 006 and 011, the "Frequency" for units subject to sampling and analyzing for fuel sulfur will read, "Sampling - daily, analysis - monthly composite".

Department Changes

The Department identified another change that was needed. The citation for specific condition C.16 was amended to add the NOx RACT rule, Rule 62-296.570(4)(a)4, F.A.C.

Please advise if your comments have been adequately addressed, or if you have comments on the other changes so that we may proceed to the Proposed permit stage. If you should have any questions, please call Joseph Kahn, P.E., or Susan DeVore at 850/488-1344.

Sincerely,


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

SMS/jk

copy to:

Mr. James Stormer, Palm Beach County Health Department
 Mr. Isidore Goldman, DEP, SE District, Air Section

Scott



CITY OF

LAKE WORTH

1900 2ND AVENUE NORTH
LAKE WORTH, FLORIDA 33461

RECEIVED

UTILITIES
DEPARTMENT

September 10, 1997

Clair H. Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

SEP 12 1997

BUREAU OF
AIR REGULATION

(561) 586-1666
FAX (561) 586-1702

RE: Tom G. Smith Power Plant and Lake Worth Water Treatment Plant
Draft Title V Permit No. 0990045-002-AV
Palm Beach County, Florida

Dear Mr. Fancy:

The City of Lake Worth Utilities received the above-referenced draft Title V permit on August 20, 1997. While the draft permit is largely consistent with the facility's current air operation permits and site certification, the draft permit includes certain conditions that should be revised or clarified, and certain important conditions appear to have been omitted. The issues that have been identified by Lake Worth regarding these conditions are included in an attachment.

We look forward to working with you and your staff in resolving these issues in a timely manner. Because the extension of time we have been granted expires relatively soon, we would appreciate receiving a response from the Department regarding the issues we have identified within the next two weeks. If you have any questions in the meantime, please do not hesitate to call me at 561-533-7384, or Bill Michael at 561-586-1703.

Sincerely,
CITY OF LAKE WORTH UTILITIES

Margaret Johnstone
Margaret Johnstone
Environmental Compliance Officer

cc: Howard L. Rhodes, DEP
Patricia Comer, DEP OGC
Scott M. Sheplak, DEP
Joseph Kahn, DEP
Harvey F. Wildschuetz, Utilities Director, Lake Worth Utilities
Bill Michael, Lake Worth Utilities

Clair H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
September 10, 1997
Page 2

bcc: Angela Morrison, HGSS
Raytheon

Tom G. Smith Power Plant and Lake Worth Water Treatment Plant
Draft Title V Permit No. 0990045-002-AV

City of Lake Worth Utilities' Comments

- **Address**--The facility address is 117 College Street, Lake Worth. It was incorrectly listed as 1900 2nd Avenue North, which is where correspondence should be sent. (Cover page)
- **Alternate Sampling Procedure**--To help clarify that the July 9, 1997 Scrivener's Order correcting an error in ASP No. 97-B-01 is part of the permit, the Scrivener's Order should be listed on the cover page of the permit, as an attachment to the permit.
- **Facility Description**--To more accurately describe the facilities covered by the Title V permit, Lake Worth suggests a slight rewording of the first sentence in Section I, Subsection A, Facility Description, as follows:

"This facility is an electric power generating plant and an ~~located~~ adjacent ~~to~~ a potable water treatment facility and consists of: . . ."

(Page 2 of 22)

- **Heat Input Rates/Limits**--Historically heat input rates for the emission units at the Tom G. Smith Power Plant have not been limited. Further, the Department's rules do not require the establishment of heat input limits for these units. While Lake Worth understands the Department's desire to establish the maximum capacity of units for purposes of determining potential to emit, there is no regulatory requirement to establish such limits for existing units in Title V permits. Lake Worth therefore requests that the Department delete all references to the heat input rates of these units as well as the proposed limits on such heat input rates under Section I, Subsections A and B; Subsection B and condition B.1; Subsection C and condition C.1; and Subsection D and condition D.1. If it is necessary to limit the capacity of these units, Lake Worth would consider the establishment of limits on the total net megawatt output of each of the units (007, 009, 010, 006, and 011). For example, Lake Worth would consider the inclusion of the following limit, as an example:

B.1 Permitted Capacity: The maximum net megawatt output limit is 7.5, for both natural gas and/or fuel oil use.

(Pages 2, 8, 10, and 13 of 22; Tables 1-1 and 2-1). Further, if conditions limiting the capacity of the units are included, such conditions should be marked "not federally enforceable" since there is no basis under the Clean Air Act for these limitations.

- **Diesel Engine Generators**--The descriptions of the five diesel engine generators should be slightly revised to more accurately describe the units, as follows:

"Five 2000 Kw diesel engine generators (Emissions Units 001-005);"

This change should be made throughout the permit, at the following locations: Page 2 of 22, Subsections A and B; page 6 of 22 (description); and Appendix S, Tables 1-1 and 2-1.

- **MW Rating of Combined Cycle Unit**--Throughout the permit, the description of the combined cycle unit (GT-2/S-5, Emissions Unit 011) should be revised to more accurately describe the unit and the MW output from each of the components, as follows:

"Combined Cycle Unit, (GT-2/S-5, Emissions Unit 011), consisting of a combustion turbine rated at a nominal 21 MW, and a non-fired heat recovery steam generator rated at a nominal 10 MW (for a total nominal rating of 31 MW) rated at 20 MW, 317.6 mmBtu/hr,"

This change should be made on page 2 of 22, subsections A and B; page 13 of 22; and Appendix S, Tables 1-1 and 2-1.

- **General VOC Standards**--In condition 6 under the Section II (facility-wide conditions), the draft permit lists several specific requirements to minimize volatile organic compound (VOC) and organic solvent (OS) emissions. The Department has not previously issued an order deeming these particular requirements "necessary" at the Power Plant or Water Treatment Plant under Rule 62-296.320(1)(a), F.A.C. Lake Worth therefore respectfully requests that paragraphs a. through d. under condition 6 be deleted. The facility is not located within an ozone nonattainment area, and the VOC emissions from the facility are quite minor. Unless these requirements are justified, they should be deleted. (Page 4 of 22)

- **Unconfined Particulate Matter**--Condition 7 under Section II (facility-wide conditions) lists eight specific precautions that must be taken to prevent emissions of unconfined particulate matter at this facility. While two of these precautions were proposed by Lake Worth and are acceptable (paragraphs g. and h.), others should be deleted or revised. (Page 5 of 22)

Specifically, paragraph a. should be revised to clarify that the facility constructs temporary sandblasting enclosures when practical and necessary to prevent unconfined particulate emissions, rather than when necessary to perform sandblasting:

"When performing sandblasting on fixed plant equipment, the facility shall construct temporary sandblasting enclosures when practical and necessary, in order to prevent unconfined particulate emissions perform sandblasting on fixed plant equipment."

In addition, paragraph c. should be revised to delete the requirement to mow grass, which is not related to unconfined particulate emissions:

"Regular mowing of grass and care of vegetation."

Paragraph e. should be revised to delete the requirement to store bagged chemical products in "weather-tight" buildings. While bagged chemicals are stored in buildings, such buildings may not constitute "weather-tight" buildings under such a condition:

"Bagged chemical products shall be are stored in ~~weather-tight~~ buildings until they are used."

To clarify and explain that this specific condition 7 supersedes the general condition 57 in Appendix TV-1, Lake Worth requests that the following sentence be added to condition 7 (consistent with representations made to the Florida Electric Power Coordinating Group, Inc., of which Lake Worth is a member, at a meeting with the Department on August 5, 1997):

"This facility-wide specific condition 7, which implements Rule 62-296.320(4)(c), F.A.C., supersedes and effectively replaces general condition 57 included as part of Appendix TV-1."

- **"Day One" for Recording and Reporting**--Specific condition 8 under Section II states that the effective date of the permit will define "day one" for any recording, monitoring, or reporting requirements that are time-specific. It is unclear what is meant by this condition and what effect, if any, it would have on reporting requirements that are based on calendar months, calendar quarters, or calendar years. Lake Worth requests that this condition be revised to clarify what is meant by this condition. (Page 5 of 22)

- **EPA Address**--Currently, Lake Worth submits acid rain data to Region IV of the U.S. Environmental Protection Agency at a different street address in Atlanta than the one provided under condition 9 of Section II. This acid rain data is the only information required to be submitted to EPA. Lake Worth requests confirmation that the address listed in the permit is the correct address for submittal of acid rain data. (Page 5 of 22)

- **Annual Testing**--The draft permit conditions for the individual emission units attempt to require that annual testing be performed "no later than February 28 of each year." Because there is no basis for this requirement in the Department's rules, Lake Worth respectfully requests that this clause be deleted from the permit in conditions A.4, B.12, C.15, and D.9:

"emissions testing for . . . shall be performed annually, ~~no later than February 28th of each year,~~ except for . . ."

Further, to help clarify that conditions E.6 through E.8 are common conditions, Lake Worth requests that the conditions be referred to as such rather than as "specific conditions."

"Except as provided in common ~~specific~~ conditions E.6 through E.8 . . ."

(Pages 6, 9, 12, and 14 of 22)

- **NO_x Testing Requirements**--Consistent with Rule 62-296.570(4)(a)3, F.A.C., and the current permits for the facility, the Title V permit should include conditions in Subsections A, B, C, and D stating that "annual compliance testing while firing oil is unnecessary for units operating on oil for less than 400 hours in the current federal fiscal year." This language could be included in conditions A.4, B.12, C.15, and D.9 or as separate conditions within those sections of the permit.

- **Fuel Consumption Records**--Lake Worth requests that paragraph b. under condition A.5. be deleted. (Page 6 of 22) This paragraph requires that the amount of diesel fuel used each month be recorded for each of the five diesel generators separately. The number of hours of operation is recorded for the units on a monthly basis, and this provides sufficient information on the usage of these units. Because there is no limit on the quantity of fuel that may be used, because this condition is not required under the Department's regulations, and because this condition would create an unnecessary burden and expense, Lake Worth requests that it be deleted.

- **Common Conditions for Section A and Section D**--Conditions A.6 and D.10 provide that common conditions E.1 through E.19 all apply to the diesel engine generators and the combustion turbines. (Pages 7 and 14 of 22) Several of these common conditions, however, do not apply, and one should be revised. Specifically, condition E.3, which quotes Rule 62-210.700(2), F.A.C., applies only to existing fossil fuel fired steam generators, and does not apply to diesel engine generators or combustion turbines. The excess emission provisions under condition E.2 would therefore need to be revised and expanded to cover not only malfunctions but startup and shutdown as well, quoting directly from Rule 62-210.700(1), F.A.C.

As stated in the condition itself, condition E.10 does not apply to diesel engine generators or combustion turbines, and this should be clarified in conditions A.6 and D.10 as well. Since EPA Method 9 must be used for the annual visible emissions testing on the diesel engine generators and combustion turbines, condition E.11 regarding DEP Method 9 does not apply, and this should be clarified.

Condition E.18 applies only to units subject to emission limiting standards under Rule 62-296.405(1), F.A.C. Since this rule does not apply to the diesel engine generators or combustion turbines (it applies only to fossil-fuel fired steam generators with greater than 250 mmBtu/hour heat input), it should be clarified that condition E.18 does not apply to these units.

Conditions A.6 and D.10 should therefore be revised, and new conditions A.7 and D.11 should be added, as follows:

"This emissions unit is also subject to conditions E.1 through E.8, E.10 through E.17, and E.19 contained in Subsection E. Common Conditions."

(Page 9 of 22)

- **Sootblowing/Load Change**--To clarify that unit S-4 is not currently required to install a continuous opacity monitor under the acid rain program (because it is currently not operational and could qualify as a natural gas unit), Lake Worth requests that the note under condition C.5 be changed as follows:

"[Rule 62-210.700(3), F.A.C., Note: unit S-3 has an operational continuous opacity monitor, and unit S-4 may in the future be is required to install an operational continuous opacity monitor to comply with federal acid rain requirements.]"

(Page 11 of 22)

- **NO_x CEM**--To be consistent with Rule 62-296.570(4)(c), F.A.C., Lake Worth requests that condition C.16 be revised to recognize the exception for startup, shutdown, and malfunctions. Further, to be consistent with Rule 62-296.570 and the current permits for Unit 3 (Emissions Unit 009), Lake Worth requests that condition C.16 clarify that the CEMS data is not required to be submitted to the Department unless specifically requested.

"Compliance shall be based on a 30-day rolling average, excluding periods of startup, shutdown, or malfunction as provided by Rule 62-210.700, F.A.C. . . . The CEMS data shall be maintained on site for inspection by the Department and need not be submitted to the Department unless specifically requested."

(Page 12 of 22)

- **Common Conditions Under Section C**--Lake Worth requests that condition C.17 be revised to clarify that condition E.9 does not apply to the units subject to Subsection C.

"This emissions unit is also subject to conditions E.1 through E.8 and E.10 through E.19 contained in Subsection E. Common Conditions."

(Page 12 of 22)

- **Stack Sampling Facilities**--Lake Worth requests clarification that temporary stack sampling facilities can be used on the units at the Tom G. Smith Power Plant, due to the historically low utilization of these units and the historically limited use of fuel oil. While common condition E.16 attaches Appendix SS-1, which quotes the Department's Rule 62-297.310(6), F.A.C., a clarification in condition E.16 that temporary stack sampling facilities may be used

would be helpful to eliminate the potential inference that could be drawn from the language that permanent stack sampling facilities are needed. Specifically, Lake Worth suggests the following language be added to condition E.16:

"Temporary stack sampling facilities under Rule 62-297.310(6)(b), F.A.C., may be used in lieu of permanent facilities."

These units are relatively small and stack tests are typically not required to be conducted on an annual basis. When testing is required at the plant, temporary stack testing facilities have successfully been used. The burden and expense of constructing permanent facilities is not justified and is not required under the Department's rules. The additional language being requested would simply clarify this in the permit. (Page 20 of 22)

- **Annual Statement of Compliance**--In condition A.4 of the acid rain part of the permit, page 22 of 22, the draft permit states that the annual statement of compliance required under Title V must be submitted within 60 days after the end of the calendar year. This condition cross-references the general requirement to submit the statement under general condition 51 of Appendix TV-1. Because this is a generally applicable requirement under Title V and is not specifically related to the acid rain part of the permit, it may be more logical to include the timing requirements for annual compliance statements as part of general condition 51 of Appendix TV-1 rather than in acid rain condition A.4.

- **Fast-Track Revisions of Acid Rain Parts**--To confirm that the provisions of Rule 62-213.413, F.A.C. (regarding fast-track revisions of acid rain parts) apply, Lake Worth requests that a reference to this rule be included in the acid rain part of the permit (on page 22 of 22). While Lake Worth believes that this rule will apply regardless of its inclusion in the permit, a sentence explaining that these provisions apply may help prevent confusion in the future. Other permit revision procedures under Chapter 62-213, F.A.C., were included in Appendix TV-1, and a reference to the fast-track revision procedures would be consistent with that approach.

- **Exempt Units**--Based on our understanding of the outcome of the meeting between the Florida Electric Power Coordinating Group, Inc. (FCG), and the Department on August 5, 1997, we understand that the Department has agreed to include additional language from Rule 62-213.430(6)a, F.A.C., in Appendix E-1 clarifying that exempt emission units or activities that are added to a Title V source after issuance of the Title V permit shall be incorporated into the permit at the next renewal, provided that such units are eligible for exemption. Please add this language to Appendix E-1.

- **Federal Enforceability**--Lake Worth is concerned that several of the general conditions listed under Appendix TV-1 are not appropriately marked "not federally enforceable." The FCG is continuing to pursue this issue with the Department, and Lake Worth requests that any changes to Appendix TV-1 made as a result of these negotiations be incorporated into its

permit as well. Lake Worth specifically requests that the Department mark condition 1, 3, 4, 10, 11, 12, 17, and 23 as "not federally enforceable" since the Department's rules which form the bases of these conditions have not been approved as part of Florida's State Implementation Plan.

- **Permit History**--In the permitting history for Emissions Unit 011, Lake Worth noted that the most recent revision dated March 27, 1996, had been omitted.

- **Summary Tables**--Under Appendix S, Permit Summary Tables, Table 1-1, Lake Worth requests that the "equivalent emissions" column be deleted. If the Department continues to include this column, Lake Worth requests that a footnote be added to clarify that this information is provided for informational purposes only and is not to be interpreted as emission "limits."

Also, under Table 2-1, the column entitled "frequency base date" should be deleted since it is not required under the Department's rules and its purpose is not explained within the table.

Under Table 2-1 for Emission Units 009 and 010, a "yes" was included in the column for continuous monitoring system for sulfur dioxide. Because the frequency of sampling is on an "as-fired" and not a "continuous" basis, Lake Worth requests that a "no" be inserted in the CMS column.

For Emission Units 006 and 011, Table 2-1 states that fuel sampling and analysis is required for sulfur dioxide. Because this sampling and analysis is required only for unit 011 and not 006, Lake Worth requests that this clarification be made in the pollutant column.



CITY OF LAKE WORTH

1900 2ND AVENUE NORTH
LAKE WORTH, FLORIDA 33461-4298

Utilities Administration

FAX

To: _____
Joseph Kahn

DEP

 Phone: *904-488-1344*
 Fax phone: *904-922-6979*
 CC: _____

Date: 9-11-97
 Number of pages including cover sheet: 11
 From: _____
Margaret Johnstone

 Phone: (407) 586-1666
 Fax phone: (407) 586-1702

REMARKS: Urgent For your review Reply ASAP Please comment

..

Fax copy of comments to Draft Title V Permit

Hard copies for all DEP Personnel listed

Send Express Mail 9-10-97 to Mr. Fancy.

Please review as we will set up a time

for conference call when ready.

Thank you.

Scott

RECEIVED

SEP 05 1997

BUREAU OF AIR REGULATION

THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

OGC No. _____

City of Lake Worth Utilities
1900 2nd Avenue North
Lake Worth, Florida 33461

DRAFT Permit No.: 0990045-002-AV
Tom G. Smith Power Plant and
Lake Worth Water Treatment Plant
Palm Beach County

_____ /

REQUEST FOR EXTENSION OF TIME

9/26
not
10/3

By and through undersigned counsel, City of Lake Worth Utilities (Lake Worth) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time, to and including October 3, 1997, in which to file a Petition for Administrative Proceedings or a Request for Mediation in the above-styled matter. As good cause for granting this request, Lake Worth states the following:

1. On or about August 20, 1997, Lake Worth received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0990045-002-AV) for the Tom G. Smith Power Plant and Lake Worth Water Treatment Plant in Palm Beach County, Florida. Along with the Intent to Issue, Lake Worth received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."

2. Based on Lake Worth's preliminary review, the draft permit and associated documents contain several provisions that warrant clarification or correction.

3. Lake Worth is in the process of developing a letter to the Department describing these issues and suggesting changes to the draft permit.

4. Representatives of Lake Worth intend to discuss this matter with staff of the Department's Bureau of Air Regulation in the near future in an effort to resolve all issues.


5. This request is filed simply as a protective measure to avoid waiver of Lake Worth's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing or formal mediation.

6. Joseph Kahn with the Department's Bureau of Air Regulation agreed to a 30-day extension on behalf of the Department. Counsel for Lake Worth has attempted without success to contact W. Douglas Beason with the Department's Office of General Counsel regarding this request.

WHEREFORE, Lake Worth respectfully requests that the time for filing of a Petition for Administrative Proceedings or a Request for Mediation in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0990045-002-AV be formally extended to and including October 3, 1997.

Respectfully submitted this 29th day of August, 1997.

HOPPING GREEN SAMS & SMITH, P.A.


Angela R. Morrison, Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for CITY OF LAKE WORTH
UTILITIES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following
by U.S. Mail on this 29th day of August, 1997:

Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

W. Douglas Beason
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

A handwritten signature in cursive script, reading "Angelle R. Morrison", is written over a horizontal line.

97998



CITY OF

LAKE WORTH

1900 2ND AVENUE NORTH
LAKE WORTH, FLORIDA 33461

UTILITIES
DEPARTMENT

(561) 586-1666
FAX (561) 586-1702

August 28, 1997

RECEIVED

AUG 29 1997

BUREAU OF
AIR REGULATION

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

Subject: Proof of Publication for Intent to Issue Title V Air Operation Permit for
Tom G. Smith Power Plant and Lake Worth Water Treatment Plant

Dear Mr. Kahn:

Please find enclosed a copy of the proof of publication of the public notice of intent to issue Title V air operation permit for the above facility. The public notice ran in the Palm Beach *Post* on Monday, August 25, 1997.

If you have any questions or require additional information, please do not hesitate to call me at (561) 533-7384.

Sincerely,
CITY OF LAKE WORTH UTILITIES

Margaret Johnstone
Margaret Johnstone
Environmental Compliance Officer

enclosure

cc: Harvey Wildschuetz, Utilities Director
William Michael, Mechanical Systems Engineer
Angela Morrison, Hopping, Green, Sams & Smith

9/2/97

Joe Kahn
Scott Sheplak

THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared **Chris Bull** who on oath says that she is **Classified Advertising Manager** of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being a Notice in the matter of Intent to Issue Title V Air Operation Permit in the --- Court, was published in said newspaper in the issues of August 25, 1997.

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Chris Bull

Sworn to and subscribed before me this 25 day of August A.D. 1997

[Signature]

Personally known XX or Produced Identification _____
Type of Identification Produced _____

NOTARY PUBLIC
STATE OF FLORIDA
Karen McLinton
Notary Public, State of Florida
Commission No. CC 591337
My Commission Exp. 11/15/2000
1-800-3-NOTARY Fla. Notary Service & Bonding Co.

NO. 370734
PUBLIC NOTICE OF INTENT
TO ISSUE TITLE V
AIR OPERATION PERMIT
STATE OF FLORIDA
DEPARTMENT
OF ENVIRONMENTAL
PROTECTION
Title V DRAFT Permit No. 0990048-002-AV
Tom G. Smith Power Plant and
Lake Worth Water Treatment
Plant
Palm Beach County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Lake Worth Utilities for the Tom G. Smith Power Plant and Lake Worth Water Treatment Plant located at 117 South College Street, Lake Worth, Palm Beach County, Florida. The applicant's name and address are: Lake Worth Utilities, 1900 2nd Avenue North, Lake Worth, FL 33461.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-6730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or

- notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
 - (d) A statement of the material facts disputed by the petitioner, if any;
 - (e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;
 - (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,
 - (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460. A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive,
Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979
Affected District:
Local Program:
DEP Southeast District
400 North Congress Avenue
West Palm Beach, FL 33401
Telephone: 561/681-6600
Fax: 561/681-6755
Palm Beach County
Health Department
901 Evernia Street,
P.O. Box 29
West Palm Beach, FL 33401
Telephone: 561/355-3070
Fax: 561/355-2442
The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.
PUB: The Palm Beach Post
August 25, 1997

PALM BEACH NEWSPAPERS, INC.

The Palm Beach Post

2751 S. Dixie Hwy., West Palm Beach, FL 33405

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Fax: (407) 820-4345

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Thursday

Monday 3PM

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Wednesday 3PM

Amount: \$441.00

Saturday

Thursday 3PM

Sunday

Thursday 3PM

Published: August 25, 1997

City of Lake Worth
1900 2nd Ave. N.
Lake Worth, FL 33461



August 22, 1997

RECEIVED

AUG 29 1997

**BUREAU OF
AIR REGULATION**

Joe Kahn, P.E.
Title V Permitting Section
Bureau of Air Regulation - DEP
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Comments on Title V Draft Permit, City of Lake Worth Utilities

Dear Mr. Kahn:

The Health Department has reviewed this Draft Permit and offers the following minor comments:

Page 2

Why describe the emissions units in Subsection A when they are fully described in the following Subsection B?

Page 5

The Health Department's P.O. Box zip code is 33402-0029.

Page 6

Our compliance inspectors would like the general visible emissions standard of 20% opacity stated for each permitted, regulated unit if it applies. We realize this is a repeat of the facility-wide conditions, but it would make it more clear.

Page 8

B.2 I suggest adding, "The maximum heat input may be further limited as a result of stack testing. See specific condition E.14."

B.10 I think it's great to sample daily and analyze the composite samples monthly to show compliance with the limit on sulfur content. I also think it would be reasonable to allow them to record the fuel usage, density, and sulfur content monthly rather than daily.

Page 12

C.13 Both of these units are subject to NOx RACT and the Acid Rain Program. Acid Rain requires the installation of a NOx CEM, so both units should demonstrate compliance by monitor, not testing. Change EU-010 to be the same as EU-009.

C.15 Typo: Delete second "28th".

Page 13

D.4 EU-011 has a sulfur limit of 0.35% by weight, the result of a previous permit applicable requirement. EU-006 has no such applicable requirement, although it has about a 35% higher heat input rating.... interesting.

Page 2
Mr. Kahn

Page 14

D.5 Should this condition include prorating the emission limit based on proportional amounts of fuel if combinations of natural gas and oil are burned? How would this affect testing requirements?

Appendix S

EU-006,011: I suggest under the column of "Fuels" switching the order of oil/gas to gas/oil to be consistent with the rest of the table.

Also suggest the following for "Frequency" for units subject to sampling and analyzing:

Frequency
Sampling - daily
Analysis - monthly composite

Other Comments:

We realize there is an ongoing debate on whether or not CEMs required by the Acid Rain Program can be used to determine compliance with other applicable standards. We also realize that this data may be used as "credible evidence" and therefore may not need to be specifically stated in the permit as the appropriate compliance method. However, our inspectors believe it would be helpful if any required CEMs were described for each emission unit under the appropriate subsection. For example:


EU-009 Fossil Fuel Steam Generating Unit 3 (S-3) rated at 26.5 MW, 325.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil, with emissions exhausted through a 113 foot stack.

Continuous monitors for SO₂, NO_x, and opacity are required by the Acid Rain Program.

In summary, it was a finely crafted document. I put it on my "must read" list. If you have any questions about these comments, please contact me at the number below.

Sincerely,

For the Division Director
Environmental Health & Engineering



Jeffery F. Koerner, P.E.
Air Permitting Supervisor
Air Pollution Control Section - PBCHD
Phone: (561) 355-4549
Fax: (561) 355-2442