

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 23-Mar-1999 07:37am  
**From:** Mary Fillingim TAL  
FILLINGIM\_M  
**Dept:** Air Resources Management  
**Tel No:** 850/488-0114

**To:** See Below  
**Subject:** New Posting #0250013

1/25/99

There is an updated PROPOSED Permit for the above-reference AIRS ID# on Florida's website.

0250013001AV G W IVEY POWER PLANT

REVISED PROPOSED

The notification letter is encoded and attached. If you have any questions, feel free to contact me.

Thanks, Mary

## Distribution:

**To:** pierce carla ( pierce.carla@epa.gov@in )  
**To:** Barbara Boutwell TAL ( BOUTWELL\_B )  
**To:** Scott Sheplak TAL ( SHEPLAK\_S )  
**To:** danois gracy ( danois.gracy@epa.gov@in )  
**To:** Elizabeth Walker TAL ( WALKER\_E )  
**To:** huey.joel@epa.gov@in  
**To:** BARTLETT.ELIZABETH@EPA.GOV@IN  
**CC:** Bruce Mitchell TAL ( MITCHELL\_B )

# INTEROFFICE MEMORANDUM

**Date:** 10-Mar-1999 01:41pm  
**From:** Bruce Mitchell TAL  
MITCHELL\_B  
**Dept:** Air Resources Management  
**Tel No:** 850/488-1344

**To:** Mary Fillingim TAL ( FILLINGIM\_M )  
**CC:** Scott Sheplak TAL ( SHEPLAK\_S )

**Subject:** Reposting of G. W. Ivey PROPOSED Title V permit pkg: 0250013-001-AV.

3/10/99

Dear Mary,

Please repost the above referenced permit package found under  
v:Bruce/permits/0250013. Many thanks.

Bruce

**Florida's PROPOSED Permit Electronic Notification Cover**  
**Memorandum**

**TO:** EPA Region 4 Gracy Danois, U.S.

**CC:** EPA Region 4 Carla E. Pierce, U.S.

**THRU:** Bureau of Air Regulation Scott Sheplak P.E.,

**FROM:** Engineer Bruce Mitchell, Permit

**DATE:** 03/10/99

**RE:** Operation Permit Review U.S. EPA Region 4 PROPOSED Title V

The following PROPOSED Title V operation permit(s) revision and associated documents have been posted on the DEP World Wide Web Internet site for your review.

Please provide any comments via Internet E-mail, within forty five (45) days of receiving this notice, to Scott Sheplak, at "SHEPLAK\_S@dep.state.fl.us".

<u>Applicant Name</u> <u>Name(s)</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File</u>
Homestead City Utilities Gordon W. Ivey Municipal Power Plant	Dade	INTERNET	0250013p.zip

This zipped file contains the following electronic files:

0250013.sob  
0250013.pd  
0250013p.doc  
0250013u.doc  
0250013h.doc

Date: 01/26/1999 9:43:21 AM  
From: Ed Svec TAL  
Subject: Posting of new PROPOSED Title V Permit  
To: Mary Fillingim TAL  
To: Elizabeth Walker TAL  
CC: Bruce Mitchell TAL  
CC: Scott Sheplak TAL

Please note!!!!

I am doing this for Bruce Mitchell

Please post PROPOSED Title V Permit 0250013-001-AV to the EPA website and notify the EPA that it has been posted. The files referenced in the notification memo can be found on the V drive under "Bruce" in folder 0250013.

**Florida's PROPOSED Permit Electronic Notification Cover Memorandum**

**TO:** Gracy Danois, U.S. EPA Region 4  
**CC:** Carla E. Pierce, U.S. EPA Region 4  
**THRU:** Scott Sheplak P.E., Bureau of Air Regulation  
**FROM:** Bruce Mitchell, Permit Engineer  
**DATE:** 01/26/99  
**RE:** U.S. EPA Region 4 PROPOSED Title V Operation Permit Review

The following PROPOSED Title V operation permit(s) revision and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, within forty five (45) days of receiving this notice, to Scott Sheplak, at "SHEPLAK\_S@dep.state.fl.us".

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Homestead City Utilities Gordon W. Ivey Municipal Power Plant	Dade	INTERNET	0250013p.zip

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0250013h.doc

Date: 01/26/1999 11:47:58 AM  
From: Mary Fillingim TAL  
Subject: New Posting #0250013  
To: See Below

There is a new posting on Florida's website.

0250013001AV  
G W IVEY POWER PLANT

Proposed

The notification letter is encoded and attached. If you have any questions,  
feel free to contact me.

Thanks,  
Mary

3-10-99

To Mary Fillingim @  
2:40 pm. spoke to her later  
and she said that she had  
received the message and  
would be posting it/typing  
today or tomorrow a.m.  
BDM

## Florida's PROPOSED Permit Electronic Notification Cover Memorandum

**TO:** Gracy Danois, U.S. EPA Region 4  
**CC:** Carla E. Pierce, U.S. EPA Region 4  
**THRU:** Scott Sheplak P.E., Bureau of Air Regulation  
**FROM:** Bruce Mitchell, Permit Engineer  
**DATE:** 03/10/99  
**RE:** U.S. EPA Region 4 PROPOSED Title V Operation Permit Review

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**Florida's PROPOSED Permit Electronic Notification Cover Memorandum**

**TO:** Gracy Danois, U.S. EPA Region 4  
**CC:** Carla E. Pierce, U.S. EPA Region 4  
**THRU:** Scott Sheplak P.E., Bureau of Air Regulation  
**FROM:** Bruce Mitchell, Permit Engineer  
**DATE:** 01/26/99  
**RE:** U.S. EPA Region 4 PROPOSED Title V Operation Permit Review

The following PROPOSED Title V operation permit(s) revision and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, within forty five (45) days of receiving this notice, to Scott Sheplak, at "SHEPLAK\_S@dep.state.fl.us".

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Homestead City Utilities Gordon W. Ivey Municipal Power Plant	Dade	INTERNET	0250013p.zip

This zipped file contains the following electronic files:

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0250013u.doc  
0250013h.doc



*Bruce Mitchell*

**STATEMENT OF BASIS**

Homestead City Utilities  
Gordon W. Ivey Municipal Power Plant  
**Facility ID No.:** 0250013  
Dade County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 0250013-001-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consist of sixteen (16) unregulated dual fuel fired engine generators, two (2) unregulated cooling towers and various unregulated fuel oil and miscellaneous storage tanks. The fuels fired are natural gas and distillate No. 2 fuel oil.

A Fax was received on October 8, 1998, from the Acid Rain Program Division of the U.S. EPA in Washington , D.C., of a revised Table 2 - Phase II Allowance Allocations. The Gordon W. Ivey Municipal Power Plant has been removed from the listing and is no longer considered to be an Acid Rain affected source.

Based on the initial Title V permit application received June 10, 1996, this facility is not a major source of hazardous air pollutants (HAPs).



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

January 25, 1999

CERTIFIED MAIL - Return Receipt Requested

Mr. James L. Swartz  
Director of Utilities  
City of Homestead  
675 North Flagler Avenue  
Homestead, Florida 33030

Re: PROPOSED Title V Permit No.: 0250013-001-AV  
Gordon W. Ivey Municipal Power Plant

Dear Mr. Swartz:

One copy of the "PROPOSED PERMIT DETERMINATION" for the Gordon W. Ivey Municipal Power Plant located at 660 N.E. 1 Road, Homestead, Dade County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www2.dep.state.fl.us/air/enhanced/Title V Permits>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Bruce Mitchell at 850/921-9506.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/BM/m

Enclosures

cc: Mr. Ivan L. Clark, P.E., R. W. Beck, Inc.  
Mr. H. Patrick Wong, DCDERM  
Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Gracy R. Danois, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

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

Printed on recycled paper.

## **PROPOSED PERMIT DETERMINATION**

### **Gordon W. Ivey Municipal Power Plant**

**PROPOSED Permit No.: 0250013-001-AV**

#### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" for the Gordon W. Ivey Municipal Power Plant located at 660 N.E. 1 Road, Homestead, Dade County, was clerked on October 14, 1998. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in The Miami Herald on October 12, 1998. The DRAFT Title V Air Operation Permit was available for public inspection at the Dade County Department of Environmental Resources Management in Miami and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on January 22, 1999.

#### **II. Comments.**

No comments were received during the 30 (thirty) day public comment period. Since no comments were received, the DRAFT Title V Air Operation Permit becomes the PROPOSED Title V Air Operation Permit. However, due to informal comments received on other PROPOSED Title V permits, EPA Region 4's address was updated (see Facility-wide Condition No. 10). Also, the facility description was altered to reflect the non-fuel oil storage tanks as "miscellaneous storage tanks".

#### **III. Conclusion.**

Since there were no comments received during the Public Notice period, no changes, except for what is noted above, were made to the DRAFT Title V Permit and the permitting authority hereby issues the PROPOSED Title V Permit, No. 0250013-001-AV.

Homestead City Utilities  
G. W. Ivey Power Plant  
**Facility ID No.:** 0250013  
Dade County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 0250013-001-AV  
**Facility ID No.:** 0250013

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Telephone: 850/488-1344  
Fax: 850/922-6979

Compliance Authority:

Dade County Department of Environmental Resources Management  
Air Quality Management Division  
Suite 900  
33 Southwest Second Avenue  
Miami, Florida 33130-1540  
Telephone: 305/372-6925  
Fax: 305/372-6954

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 0250013-001-AV  
**Facility ID No.:** 0250013

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Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

**Permittee:**  
Homestead City Utilities  
675 North Flagler Avenue  
Homestead, Florida 33030

**PROPOSED Permit No.:** 0250013-001-AV  
**Facility ID No.:** 0250013  
**SIC Nos.:** 49, 4911  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the G. W. Ivey Power Plant. This facility is located at 660 NE 1 Road, Homestead, Dade County; UTM Coordinates: Zone 17, 553.8 km East and 2813.3 km North; Latitude: 25° 28' 24" North and Longitude: 80° 27' 53" West.

**STATEMENT OF BASIS:** This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**

Appendix U-1, List of Unregulated Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

**Effective Date:** March 22, 1999

**Renewal Application Due Date:** September 21, 2003

**Expiration Date:** March 21, 2004

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Howard L. Rhodes, Director  
Division of Air Resources Management

HLR/sms/bm

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of sixteen (16) unregulated dual fuel fired engine generators, two (2) unregulated cooling towers and various unregulated fuel oil and miscellaneous storage tanks.

Based on the initial Title V permit application received June 10, 1996, this facility is not a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

Unregulated Emissions Units and/or Activities

<u>E.U. ID No.</u>	<u>Brief Description of Emissions Units and/or Activity</u>
-002	2070 kW Dual Fuel Diesel Generator #2
-003	2070 kW Dual Fuel Diesel Generator #3
-008	2500 kW Dual Fuel Diesel Generator #8
-009	2500 kW Dual Fuel Diesel Generator #9
-010	2500 kW Dual Fuel Diesel Generator #10
-011	3270 kW Dual Fuel Diesel Generator #11
-012	3270 kW Dual Fuel Diesel Generator #12
-013	2070 kW Dual Fuel Diesel Generator #13
-014	2070 kW Dual Fuel Diesel Generator #14
-014	2070 kW Dual Fuel Diesel Generator #15
-016	2070 kW Dual Fuel Diesel Generator #16
-017	2070 kW Dual Fuel Diesel Generator #17
-018	8800 kW Dual Fuel Diesel Generator #18
-019	8800 kW Dual Fuel Diesel Generator #19
-020	6485 kW Dual Fuel Diesel Generator #20
-021	6485 kW Dual Fuel Diesel Generator #21
-xxx	Two (2) Cooling Towers for Units Nos. 18 and 19
-xxx	Various Storage Tanks for Diesel Fuel, Lube Oil and Solvents

***Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.***

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received June 10, 1996.

Fax received from U.S. EPA on October 8, 1998.



## **Section II. Facility-wide Conditions.**

### **The following conditions apply facility-wide:**

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.  
[Rule 62-213.440(1), F.A.C.]

**6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.** The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

{Permitting note: Nothing has been deemed or ordered necessary by the Department to date.}

[Rule 62-296.320(1)(a), F.A.C.]

**7. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: paved fuel delivery roads and parking lots.  
[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the initial Title V permit application received June 10, 1996]

**8.** When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.  
[Rule 62-213.440, F.A.C.]

**9.** The permittee shall submit all compliance related notifications and reports required of this permit to the Dade County Department of Environmental Resources Management office.

Dade County Department of Environmental Resources Management  
Air Quality Management Division  
Suite 900  
33 Southwest Second Avenue  
Miami, Florida 33130-1540  
Telephone: 305/372-6925  
Fax: 305/372-6954

**10.** Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Air and EPCRA Branch  
Air Compliance Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9099  
Fax: 404/562-9095

**Appendix U-1, List of Unregulated Emissions Units and/or Activities.**

Homestead City Utilities  
G. W. Ivey Power Plant

**PROPOSED Permit No.:** 0250013-001-AV  
**Facility ID No.:** 0250013

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Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

<u>E.U. ID No.</u>	<u>Brief Description of Emissions Units and/or Activity</u>
-002	2070 kW Dual Fuel Diesel Generator #2
-003	2070 kW Dual Fuel Diesel Generator #3
-008	2500 kW Dual Fuel Diesel Generator #8
-009	2500 kW Dual Fuel Diesel Generator #9
-010	2500 kW Dual Fuel Diesel Generator #10
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-014	2070 kW Dual Fuel Diesel Generator #14
-014	2070 kW Dual Fuel Diesel Generator #15
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