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MIAMI-DADE WATER AND SEWER DEPARTMENT
4200 Salzedo Street, Coral Gables, Florida 33146 • Tel: 305-669-3700 • Fax: 669-3788

June 21, 1999

CERTIFIED: Z 427 642 184
RETURN RECEIPT

Mr. Alvaro A. Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JUN 28 1999

BUREAU OF
AIR REGULATION

RE: Comments and Revisions to Draft Air Construction Permit for Alexander Orr, Jr. WTP
Standby Diesel Engine Generators (DEP File No. 0250314-002-AC, PSD-FL-249)

Dear Mr. Linero:

The Miami-Dade Water and Sewer Department (MDWASD) has received a copy of the above referenced draft construction permit and technical evaluation issued by the Florida Department of Environmental Protection (FDEP). Our comments are as follows:

Regarding the Technical Evaluation (TE) and Preliminary Determination:

1. In the first paragraph in Section 4. "Project Emissions", the number of generators is four.
2. The word "maximum" should be inserted before "0.05%" in the last paragraph in Section 6. "Air Pollution Control Techniques", which states "...very low sulfur diesel fuel (0.05% sulfur by weight)" for consistency within the TE and with the application.
3. The paragraph in Section 7.7 "AAQS Analysis" refers to "standby" generators, this is correct, in that the generators serve as standby power to allow for continuous operations, but is not consistent with the naming found in the rest of the document. To clarify this, our recommendation is to include the word "standby" before the word "generator" whenever referring to emissions units nos. 009, 010, 011 and 012 (General Motors Electro-Motive Diesels (EMD) model 20-645F4B).

Regarding the Draft Air Construction Permit 0250314-002-AC, PSD-FL-249:

1. Include the word "Standby" before "Generator" in the footer of the permit and in all of the emissions unit descriptions found in Section I, "Facility Information" and Section III, "Emissions Unit Specific Conditions".
2. The note at the end of Section III, Operational Requirement, condition 2 is a correct operational characteristic of a single EMD engine, but not an operational requirement. It needs be placed under the emission unit description, so it is not construed as an additional operational limitation in the Title V operating permit to be issued by FDEP Southeast District.
3. The note at the end of Section III, Emission Limitations and Performance Standards, condition 5 merely restates the limitation in other forms. The note is better suited in the technical evaluation and it needs to be removed from the final permit for clarity.

Mr. Alvaro A. Linero, P.E., June 21, 1999

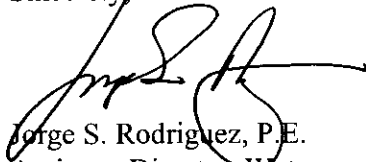
AOWTP, Draft Title V Air Construction Permit, DEP File No. 0250314-002-AC, PSD-FL-249

Page 2

4. Revise the last sentence of condition 7 to state, "The owner or operator may comply with this requirement by receiving records from the fuel supplier that indicate the sulfur content of the fuel delivered, complies with the sulfur limit of specific condition 2 of this section."

We request that you revise the permit and technical evaluation as noted. If you have any questions regarding the requested changes, please call Mr. Richard M. O'Rourke, P.E. at (305) 669-5749 or Mr. David Lindberg, P.E. at (619) 687-0110.

Sincerely,



Jorge S. Rodriguez, P.E.
Assistant Director, Water

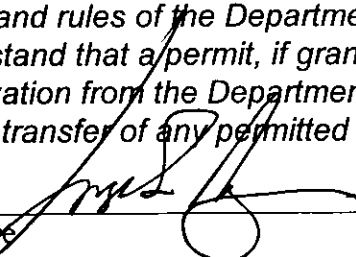
JSR/BMG/rmo

Attachments

cc: Joseph Kahn, FDEP/TAL
Isidore Goldman, FDEP/WPB
Manuel Delosantos, FDEP/WPB
Patrick Wong, Miami-Dade County DERM
David Lindberg, CH2M HILL

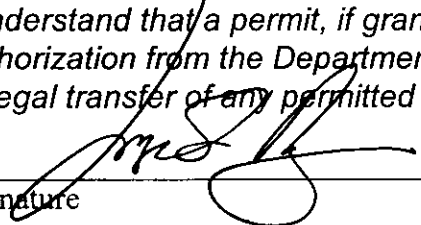
cc: File
EPA
NPS

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :	
Name :	Jorge S. Rodriguez, P.E.
Title :	Assistant Director, Water
2. Owner or Authorized Representative or Responsible Official Mailing Address :	
Organization/Firm :	Miami-Dade Water & Sewer Dept.
Street Address :	4200 Salzedo Street
City :	Coral Gables
State :	FL
Zip Code :	33146-0316
3. Owner/Authorized Representative or Responsible Official Telephone Numbers :	
Telephone :	(305)669-7602
Fax :	(305)669-5796
4. Owner/Authorized Representative or Responsible Official Statement :	
<p><i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.</i></p>	
Signature	
Date	6/22/99

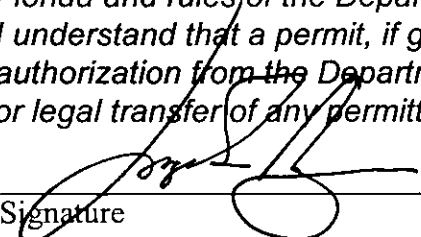
* Attach letter of authorization if not currently on file.

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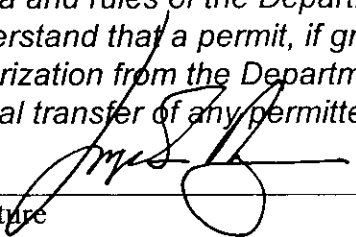
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