



MIAMI-DADE WATER AND SEWER DEPARTMENT  
P.O. Box 330316, Miami, Florida 33233-0316 • 3575 S. LeJeune Road • Tel: 305-665-7471

RECEIVED

NOV 04 2002

Certified Mail: 7001 0360 0001 6782 8001  
Return Receipt

October 31, 2002

BUREAU OF AIR REGULATION

Mr. Syed Arif, P.E.  
New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Draft Air Construction Permit Comments, Alexander Orr, Jr. Water Treatment Plant, Three Natural Gas Fueled Engine Driven Pump Sets and One Diesel Fueled Standby Generator, DEP File No. 0250314-005-AC

Dear Mr. Arif:

Attached, please find a file copy of the letter that was transmitted via e-mail on October 15, 2002; original sent via regular post on October 18, 2002.

Please contact me at (786) 552-8123 if there are any questions.

Sincerely,

Richard M. O'Rourke, P.E.  
Permitting

RMO/ro

cc: Gracy Danois, EPA Region 4  
Tom Tittle, FDEP/SED  
Mallika Muthiah, M-D/DERM

Attachment: Miami-Dade Water & Sewer Letter Dated October 15, 2002



SERVE • CONSERVE

MIAMI-DADE WATER AND SEWER DEPARTMENT  
P.O. Box 330316, Miami, Florida 33233-0316 • 3575 S. LeJeune Road • Tel: 305-665-7471

October 15, 2002

**ELECTRONIC CORRESPONDENCE**  
**SYED.ARIF@DEP.STATE.FL.US**

Mr. Syed Arif, P.E.  
New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Draft Air Construction Permit Comments, Alexander Orr, Jr. Water Treatment Plant, Three Natural Gas Fueled Engine Driven Pump Sets and One Diesel Fueled Standby Generator, DEP File No. 0250314-005-AC

Dear Mr. Arif:

The Miami-Dade Water and Sewer Department (MDWASD) received the referenced draft air construction permit issued by the Florida Department of Environmental Protection (FDEP) on October 2, 2002.

The following comments pertain to the Specific Conditions for the Caterpillar Model 3508 TA-130 emergency generator in Section III of the DRAFT Permit:

1. Hours of Operation: WASD requests that this condition be changed to read: "1. Hours of Operation: The hours of operation for this emission unit shall not exceed 500 hours in any consecutive 12-month period."
2. Fuel: WASD requests that the last two sentences regarding fuel consumption be removed and the condition be revised to read: "2. Fuel: The emission unit shall be fired with diesel fuel with a maximum sulfur content of 0.05 percent, by weight. {Permitting note: At 100% engine load a Model 3508 engine fuel consumption is 66.5 gallons per hour, based on a 35-degree API diesel fuel with a higher heating value of 18,390 Btu/lb. On this basis, the fuel consumption for 500 hours of operation at 100 percent engine load is approximately 33,250 gallons.}"
9. Fuel Consumption: WASD requests that this condition be changed to: "9. Hours of Operation: The owner or operator shall monitor the hours of operation of the emission units with an hour meter."
10. Meter Fuel Calibration: WASD recommends that this condition be removed in its entirety.

These changes are requested because the emissions of nitrous oxides, the pollutant of concern, in the permit application was based on an hourly emission rate for 500 hours of operation at full load and not on an emission factor for fuel consumption.

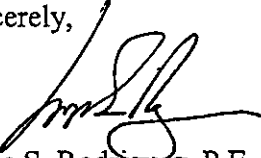
Mr. Syed Arif, P.E., October 15, 2002

Page 2

Draft Air Construction Permit Comments, Alexander Orr, Jr. Water Treatment Plant, Three Natural Gas Fueled Engine Driven Pump Sets and One Diesel Fueled Standby Generator, DEP File No. 0250314-005-AC

As the designated Responsible Official of this facility, I certify this to be true, accurate, and complete based upon information and belief formed after reasonable inquiry. Please contact me at (786) 552-8112 or Mr. Richard M. O'Rourke, P.E. at (786) 552-8123 if there are any questions regarding this letter.

Sincerely,



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

JSR/RMO/ro

- c: Gracy Danois, EPA Region 4
- Tom Tittle, FDEP/SED
- Mallika Muthiah, M-D/DERM

Mr. Syed Arif, P.E., October 31, 2002

Page 2

Draft Air Construction Permit Comments, Alexander Orr, Jr. Water Treatment Plant, Three Natural Gas Fueled Engine Driven Pump Sets and One Diesel Fueled Standby Generator, DEP File No. 0250314-005-AC

bc: W. Brant  
J. Rodriguez  
H. Codispoti  
T. Segars  
M. Berounsky  
J. Epaves  
B. Goldenberg  
D. Edwards



SERVE • CONSERVE

MIAMI-DADE WATER AND SEWER DEPARTMENT  
P.O. Box 330316, Miami, Florida 33233-0316 • 3575 S. LeJeune Road • Tel: 305-665-7471

October 4, 2002

Certified Mail: 7001 0360 0001 6782 7950  
Return Receipt

Mr. Syed Arif, P.E.  
New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Alexander Orr, Jr. Water Treatment Plant, Three Natural Gas Fueled Engine Driven Pump Sets and One Diesel Fueled Standby Generator, DEP File No. 0250314-005-AC

Dear Mr. Arif:

Attached, please find the certified proofs of publication for the "Public Notice of Intent to Issue Air Construction Permit" for the subject Title V Air Construction Permit Application.

Should there be any questions regarding this submission, please contact me at (786) 552-8123.

Sincerely,

Richard M. O'Rourke, P.E.  
Environmental Permits

RMO/ro

c: Tom Tittle, DEP Southeast District  
Patrick Wong, Dade County DERM  
Gregg Worley, EPA Region 4  
Charlie Neese, Poole & Kent

Attachment: Notarized Proof of Publication of Public Notice of Intent to Issue Air Construction Permit, DEP File No. 0250314-005-AC (Two Pages)

RECEIVED

OCT 10 2002

BUREAU OF AIR REGULATION

L0251dep.doc

RECEIVED

OCT 10 2002

BUREAU OF AIR REGULATION

MIAMI DAILY BUSINESS REVIEW

Published Daily except Saturday, Sunday and Legal Holidays  
Miami, Miami-Dade County, Florida

STATE OF FLORIDA  
COUNTY OF MIAMI-DADE:

Before the undersigned authority personally appeared O.V. FERBEYRE, who on oath says that he or she is the SUPERVISOR, Legal Notices of the Miami Daily Business Review f/k/a Miami Review, a daily (except Saturday, Sunday and Legal Holidays) newspaper, published at Miami in Miami-Dade County, Florida; that the attached copy of advertisement, being a Legal Advertisement of Notice in the matter of

NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT TO MIAMI-DADE WATER & SEWER DEPT.

in the XXXX Court,  
was published in said newspaper in the issues of

10/02/2002

Affiant further says that the said Miami Daily Business Review is a newspaper published at Miami in said Miami-Dade County, Florida and that the said newspaper has heretofore been continuously published in said Miami-Dade County, Florida, each day (except Saturday, Sunday and Legal Holidays) and has been entered as second class mail matter at the post office in Miami in said Miami-Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she 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.

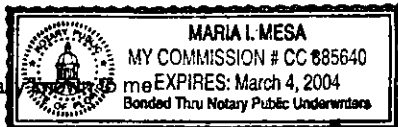
*[Handwritten Signature]*

Sworn to and subscribed before me this  
02 day of OCTOBER, A.D. 2002

*[Handwritten Signature]*

(SEAL)

O.V. FERBEYRE persona



PUBLIC NOTICE OF INTENT TO ISSUE  
AIR CONSTRUCTION PERMIT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0250314-005-AC  
Miami-Dade Water & Sewer Department  
Alexander Orr, Jr. Water Treatment Plant  
Miami-Dade County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Miami-Dade Water & Sewer Department, for the Alexander Orr, Jr. Water Treatment Plant located at 6800 SW 87 Avenue, Miami, Miami-Dade County. The permit is to remove existing pumps and engines numbers 1 and 2, replacing the (pump/generator) capacity of engine number 1 with a diesel fueled engine driven emergency generator set and to replace existing diesel fueled engine driven pump numbers 3, 4 and 5 with three natural gas fueled engine driven pumps. The applicant's mailing address is: 3071 SW 38th Avenue, Miami, Florida 33146-1520. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21: Prevention of Significant Deterioration (PSD).

The existing pump engines are fuel oil fired. The replacement engines have significantly lower air pollutant emissions per unit of work. The replacement emergency generator is restricted to 500 hours of operation annually. This restriction will keep nitrogen oxides emissions below the PSD significance levels. With the exception of carbon monoxide, potential emissions from the new engines are not expected to significantly increase compared to the past actual emissions of the existing engines. Carbon monoxide emissions do not increase above the PSD significance levels. An air quality impact analysis was not required or conducted.

The original permitting was done in 1999. The units proposed in the previous permit were not installed, the emission increment was not consumed and this project replaces the previous one.

The Department will issue the Final permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit modification issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue PSD permit modification. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.