



Florida Department of Environmental Protection

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December 18, 2007

Electronically Sent – Received Receipt Requested

terrero@miamidade.gov

Mr. Rafael A. Terrero, P.E.
Assistant Director Water
Miami-Dade Water & Sewer Department
3071 S.W. 38 Avenue
Miami, Florida 33146

Re: Generator Unit 6 (EU 025) Model 16-710G4C-T2/DEP File No. 0250314-010-AC
Related DEP Files No. 0250314-009-AC
Alexander Orr Water Treatment Plant

Dear Mr. Terrero:

The Department has received your application for the construction/installation of one diesel fueled standby generator Model 16-710G4C-T2. The application was received on November 30, 2007. In order to continue processing your application, the Department will need the additional information below. Should your response to any of the following items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

The application as presented concluded that no significant increase occurred and no review under the prevention of significant deterioration was required. Although, this conclusion appears to be correct, we would like to evaluate the following data as mentioned in the application.

The application contains three Tables: Table 4-2 (Page 20 of the report); Table 4-3 (Net Emissions Change) and Table A-2 (Net Emissions Change) that appears to contain conflicting information:

1. Table A-2 refers to the four (4) existing generators with a listed NO_x emissions of 517.347 TPY. How this number compares to the baseline NO_x emissions of 258.67 TPY in Table 4-3 Net Emissions Change?
2. Table A-2 refers to the four (4) existing generators with a listed fuel consumption of 2,294.266 gal/yr. How this number compares to the baseline fuel consumption of 1,147,133 gal/yr in Section FI for each pollutant?
3. Are the emissions from Unit 5 considered in the overall baseline summary or in the projected summary? Are emissions from Unit 5 considered as an existing unit or as a new unit in Table 4-3 Net Emissions Change?
4. What is the unit maximum heat input rate of proposed Unit 6?
5. Pursuant to Rule 62-210.400(2)(a)3, F.A.C Hybrid Test for Multiple Types of Emissions Units. Please present an emissions scenario when the existing units will be operating concurrently with the proposed unit as described in the application. If the existing five units are operating at the same time

with new Unit 6, please resubmit the operating emissions scenario and calculations in Table 4-3 Net Emissions Change. Refer to Rule 62-210.209(179)(f) "Net Emissions Increase".

6. If any of the pollutants exceed the PSD significant threshold level due to the new calculations, please submit the appropriate BACT analysis for that pollutant. Please refer to Rule 62-212.400 (2)3. Hybrid Test for Multiple Types of Emissions Units and to the Rule 62-210.200 (34) "Baseline Actual Emissions" and "Baseline Actual Emissions for PAL"; Rule 62-210.200 (179) "Net Emissions Increase".

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."

I will be happy to meet and discuss the details with you and your staff. If you have any questions, please call Teresa Heron at 850/921-9529.

Sincerely,



A. A. Linero, P.E. Administrator
New Source Review Section

CC:

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