

# Florida Department of Environmental Protection

## Memorandum

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TO: Trina Vielhauer, Chief  
Bureau of Air Regulation

FROM: Syed Arif, Acting for Al Linero, Special Project Administrator SA 517  
Teresa Heron, Project Engineer T.H.

DATE: May 7, 2008

SUBJECT: Draft Air Permit No. 0250314-014-AC  
Miami-Dade Water & Sewer Department (MDWASD) - Alexander Orr Jr. Water Treatment Plant  
New Backup Standby Generator No. 6 Equipment Change

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft permit authorizes the change of Unit 6 from General Motors Model No. 20-645F4B to General Motors Model No. 16-710G4C-T2, and the revision of operational restrictions for all units (1-6). Unit 6 received a permit (0250314-009-AC) in 2006 along with Unit 5 to serve as backup to the existing standby generating bank of four units at the Alexander Orr Jr. Water Treatment Plant. The draft permit contains conditions to ensure that the proposed project does not trigger Prevention of Significant Deterioration preconstruction review.

The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The Professional Engineer certification briefly summarizes the proposed project.

We recommend your approval of the attached Draft Permit for this project.

Attachments



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## PERMITTEE

Miami-Dade Water & Sewer Department (MDWASD)  
Alexander Orr Jr. Water Treatment Plant  
P.O. Box 330316  
Miami, Florida 33233-0316

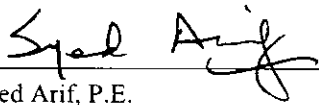
Air Permit No. 0250314-014-AC  
SIC No. 4941  
Backup Standby Generator Unit 6  
Dade County, Florida

## PROJECT DESCRIPTION

The applicant proposes to install one new standby generator to provide redundant capacity for the existing standby generator bank and ensure an uninterrupted potable water supply and pressure. Proposed new generator Unit 6 will consist of a General Motors EMD Model No. 16-710G4CT2 standby generator set rated at 2685 kilowatts. This unit is a more modern version of the existing standby generators and includes CBOI (constant beginning of injection) injectors and 4-pass combustion air after-coolers to reduce nitrogen oxides (NOx) emissions. This unit was permitted in a previous construction permit (0250314-009-AC), but was not installed during the permit effective period.

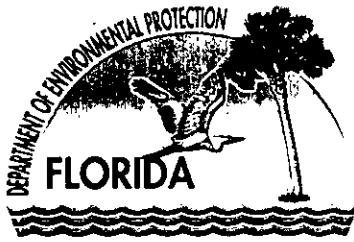
The draft air construction permit includes the following operational restrictions: only diesel fuel with a maximum sulfur content of 0.05% sulfur by weight or less shall be fired; NOx emissions shall not exceed 3.40 pounds per million British thermal units (lb/MMBtu); total fuel consumption of the standby generating bank of six engines shall not exceed 1,200,000 gallons during any consecutive 12 months; and a NOx cap emissions limit of 282 tons per year. Therefore, there will be no significant increase in NOx emissions and the project is not subject to Prevention of Significant Deterioration (PSD) preconstruction review.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*

  
Syed Arif, P.E.  
Registration Number: 51861

5/7/08  
(Date)

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# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor  
Jeff Kottkamp  
Lt. Governor  
Michael W. Sole  
Secretary

May 7, 2008

*Electronically Sent – Received Receipt Requested*

TERRERO@miamidade.gov  
Mr. Rafael A. Terrero, P.E., BCEE, M.ASCE  
Miami-Dade Water & Sewer Department (MDWASD)  
Alexander Orr Jr. Water Treatment Plant  
P.O. Box 330316  
Miami, Florida 33233-0316

Re: Air Construction Permit No. 0250314-014-AC  
Miami-Dade WASD - Alexander Orr Jr. Water Treatment Plant  
New Backup Standby Generator Unit 6 – Equipment Modification and Existing Permit Modifications

Dear Mr. Terrero:

On November 30, 2007 (complete on February 14, 2008 ) you submitted an application for an air construction permit pursuant to the rules for the Prevention of Significant Deterioration (PSD Permit) in accordance with Rule 62-212.400, Florida Administrative Code to construct a diesel-fueled standby generator (Unit 6) at the facility identified above. Enclosed are the following documents:

- The Technical Evaluation and Preliminary Determination;
- Draft Air Permit;
- Written Notice of Intent to Issue Air Permit; and
- Public Notice of Intent to Issue Air Permit. This is the actual notice you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions regarding this matter, please contact the Project Engineer, Mrs. Teresa Heron at (850)921-9529 or Mr. Syed Arif, Acting Program Administrator at (850)921-9528.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

TLV/sa/tmh

Enclosures

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Miami-Dade Water & Sewer Department (MDWASD)  
Alexander Orr Jr. Water Treatment Plant  
P.O. Box 330316  
Miami, Florida 33233-0316

Air Permit No. 0250314-014-AC  
Alexander Orr Jr. Water Treatment  
Plant  
Backup Standby Generator Unit 6  
Dade County, Florida

*Authorized Representative:*

Mr. Rafael A. Terrero, P.E., BCEE, M.ASCE

**Facility Location:** The Miami-Dade Water & Sewer Department operates the existing Alexander Orr Jr. Water Treatment Plant located in Miami at 6800 SW 87<sup>th</sup> Street in Dade County, Florida.

**Project:** The applicant is proposing a change in equipment of the proposed backup standby generating Unit 6 {Emission Unit No. 25} and the revision of operational restrictions for Units 1-6 at the Alexander Orr Jr. Water Treatment Plant. Details of the project are provided in the application and the enclosed "Technical Evaluation and Preliminary Determination".

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

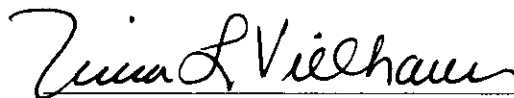
**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 appropriate 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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 Written Notice of Intent to Issue Air Permit. 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.

**Mediation:** Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Permit package (including the Written Notice of Intent to Issue Permit, Public Notice of Intent to Issue Permit, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 5/7/08 to the persons listed below

R. O'Rourke, P.E., MDWASD: [ROROU01@miamidade.gov](mailto:ROROU01@miamidade.gov)

M. Muthiah, DERM: [MuthiM@miamidade.gov](mailto:MuthiM@miamidade.gov)

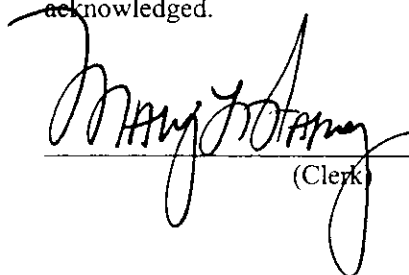
L. Hoefert, FDEP/SED: [Lee.Hoefert@dep.state.fl.us](mailto:Lee.Hoefert@dep.state.fl.us)

Katy Forney: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)

Dee Morse, U.S. National Park Service: [dee\\_morse@nps.gov](mailto:dee_morse@nps.gov)

Clerk Stamp

**FILED AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

5/7/08  
\_\_\_\_\_  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

Draft Air Permit No. 0250314-014-AC

Miami-Dade Water & Sewer Department  
Alexander Orr Jr. Water Treatment Plant

Dade County, Florida

**Applicant:** The applicant for this project is the Miami-Dade Water & Sewer Department. The applicant's authorized representative and mailing address is: Mr. Rafael A. Terrero, P.O. Box 330316, Miami, Florida 33233-0316.

**Facility Location:** The Miami-Dade Water & Sewer Department operates the Alexander Orr Jr. Water Treatment Plant, which is located in Miami at 6800 SW 87<sup>th</sup> Street in Dade County, Florida.

**Project:** The applicant is proposing a change in equipment of the proposed backup standby generating Unit 6 (Emission Unit No. 25) and the revision of operational restrictions for Units 1-6. Proposed new generator Unit 6 consists of a General Motors EMD Model No. 16-710G4C-T2 standby generator set rated at 2865 kW. This unit is a more modern version of the existing standby generators and includes CBOI (constant beginning of injection) injectors and 4-pass combustion air after-coolers to reduce nitrogen oxides (NOx) emissions.

The draft air construction permit includes the following operational restrictions: only diesel fuel with a maximum sulfur content of 0.05% sulfur by weight or less shall be fired; NOx emissions shall not exceed 3.40 pounds per million british thermal unit (lb/MMBtu); total fuel consumption of the standby generating bank of six engines shall not exceed 1,200,000 gallons during any consecutive 12 months and a not to exceed NOx cap of 282 tons per year.

There will be no significant net increase in NOx emissions and the project is not subject to Prevention of Significant Deterioration (PSD) preconstruction review.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site:  
<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

(Public Notice to be Published in the Newspaper)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** 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 with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 appropriate 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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 Public Notice of Intent to Issue Air Permit. 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.

**Mediation:** Mediation is not available for this proceeding.



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**PROJECT**

Alexander Orr Jr. Water Treatment Plant  
ARMS Facility ID No. 0250314

Project No. 0250314-014-AC

Installation of Unit 6 General Motors Electro-Motive Diesel (EMD) Model No. 16-710G4C-T2  
and Minor Permit Operational Modifications

**COUNTY**

Dade County

**APPLICANT**

Miami-Dade Water & Sewer Department (MDWASD)  
Alexander Orr Jr. Water Treatment Plant  
P.O. Box 330316  
Miami, Florida 33233-0316

**PERMITTING  
AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Special Projects Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, FL 32399-2400



May 7, 2008

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 1. GENERAL PROJECT INFORMATION

### Facility Description and Location

The facility is an existing water treatment plant which is categorized under Standard Industrial Classification Code (SIC) No. 4941. The facility is located in Miami at 6800 SW 87<sup>th</sup> Street in Dade County, Florida. The UTM coordinates are Zone 17, 565.9 km East, and 2843.3 km North.

### Regulatory Categories

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.)

PSD: The facility is a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

### Project Description

#### *Background Information*

The existing water treatment plant includes a bank of five 2865 kilowatts (kW) standby generators that are used to provide power generation capacity during the following periods: load-sharing with the local utility (FPL); power failure events; or as needed under other circumstances including severe weather warnings and events of potential electric utility power losses or reductions.

Units 1-4 are standby generators and are regulated under Permit No. PSD-FL-249, which was issued in 1999 to authorize an increase in operation for the existing units. These engines are General Motors EMD model 20-645F4B generators, each with a nominal base load rating of 2865 kW driven by a 4,000 brake horsepower (bhp) prime mover. Each prime mover is a 20 cylinder, 2-cycle turbocharged diesel engine.

Units 5 and 6, also General Motors EMD Model No. 20-645F4B standby generator sets, are rated at 2865 kW, and were permitted under Permit 0250314-009-AC in October 2005. These units are a modern version of the existing standby generators and include CBOI (constant beginning of injection) injectors and 4-pass combustion air after-coolers to reduce nitrogen oxides (NOx) emissions. These units were permitted to provide redundant capacity for the existing standby generator bank and ensure an uninterrupted potable water supply and pressure. Unit 5 started operation in September 2007. Unit 6 was not installed during the previous permit effective period.

#### *Current Proposal*

The applicant proposes the following for this project:

- To change Unit 6 generator General Motors EMD equipment from Model No. 20-645F4B to Model No. 16-710G4C-T2; and
- To remove and/or modify Section III Specific Condition No.4, (4.b, 4.c, 4.d, 4.e) of Permit 0250314-009-AC that restricts fuel consumption and the operating mode of the standby generators bank as follows:
  4. Operational Restrictions, Standby Generating Bank Units 1 -6:
    - 4.a. The hours of operation of are not limited (8760 hours per year).
    - 4.b. ~~No more than four of the six units in the standby generator bank shall operate at any given time except for a brief period, not to exceed 15 minutes per instance, solely for the purpose of replacing a running generator with another unit. In such cases, five units may be in operation while one unit is started up and stabilized, and the unit being replaced is shutdown.~~
    - 4.c. The total combined fuel consumption of the standby generating bank (Units 1 – 6) shall not exceed ~~1,415,000~~ 1,200,000 gallons during any consecutive 12 months.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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4.d. Backup standby generator Units 5 and 6 shall not be used for peak shaving.

4.e. The total combined fuel consumption of backup standby generator Units 5 and 6 shall not exceed 660,000 gallons during any consecutive 12 months.

- To revise Section III, Specific Condition No. 5 of Permit 0250314-009-AC by reducing NOx emissions rate from 4.12 to 3.40 pounds per million British thermal units (lb/MMBtu) and from 403 to 282 tons per year:
  5. NOx Standard: Emissions of nitrogen oxides (NOx) shall not exceed ~~4.12~~ 3.40 lb/MMBtu as determined by the average of three 1-hour compliance test runs conducted in accordance with EPA Method 7 or 7E. {Permitting Note: This is equivalent to a NOx emission rate of approximately ~~44~~ 92.5 pounds per hour at 100% engine load for each unit. NOx emissions from the bank of six standby generators are limited to ~~403~~ 282 tons per year by the conditions of this permit and Permit No. PSD-FL-249.}

As described in the application, this new generator set consists of a turbocharged diesel engine as the prime mover driving a single bearing generator. The engine is cold starting, compression ignition, and has needle valve electronically controlled unit fuel injectors. The pistons are oil-cooled from a direct pressure stream supplied by an engine driven piston cooling oil pump. Cylinder liners are individually removable or can be replaced as part of the power assembly during overhaul level maintenance. The assembled diesel generator set is solidly mounted to a rigid structural steel base. A carefully balanced generator and the inherent smooth operating characteristics of the 2-cycle engine produce minimum equipment vibrations throughout the operating speed range. The assembled diesel generator set is located within an individual enclosed structure. An exhaust stack silencer is mounted horizontally on top of the enclosed structure and the exhaust stack terminates vertically with a rain cap fitted to the end of the exhaust. This engine is equipped with EMD's engine control system and electronic unit injectors (EUI), and is certified for compliance with United State Environmental Protection Agency (USEPA) Tier 2 regulations in accordance with 40 Code of Federal Regulations (CFR) Part 60, Subpart IIII. The diesel engine output at 900 rpm is equal to 4000 bhp (4400 peaking) and 2865 kW (3150 Kw peaking).

The applicant states in the application that although the inclusion of these conditions such as, "no more than four of the six units in the standby generator bank shall operate at any given time...", from the previous permit were acceptable to MDWASD at the time of issuance of permit 0250314-009-AC, changes in operating conditions at the facility have caused them to be a hardship that adversely affects the facility manager's abilities to adequately provide for the needs of the public and to maintain a safe and adequate drinking water supply under all conditions. For example, all standby generator engines would be needed to provide sufficient power under the most extreme conditions, which would include full utility power loss along with a major distribution water main break requiring the use of the backup diesel and gas engines for the pumps.

Therefore, the applicant is proposing additional reductions in limits and fuels to allow greater operational flexibility while still decreasing emissions.

### Application Processing Schedule

11-30-07 Received application.  
12-30-07 Requested additional information.  
02-14-08 Received additional information. Application is complete.

## 2. APPLICABLE REGULATIONS

### State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.).

The proposed limit for NOx of 3.40 lb/MMBtu for each emissions unit (Units 1-6) are more stringent than the NOx Reasonable Available Control Technology (RACT) limit of 4.75 lb/MMBtu specified by Rule 62-296.570(4)(b)7., F.A.C or the existing NOx Best Available Control Technology (BACT) limit of 4.12 lb/MMBtu. The draft permit for

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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this project will require compliance with the more stringent limits (new proposed limit) rather than the existing BACT limit or the RACT limit.

This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Required Permits, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Requirements, and BACT Determinations
62-213	Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

### **PSD Applicability Criteria**

The Department regulates major air pollution sources in accordance with Florida's PSD program under Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories defined in Rule 62-210.200, F.A.C.; or 5 tons per year or more of lead.

For new projects at existing PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions threshold known as the "Significant Emission Rates" (SER) defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and applicants must employ BACT to minimize emissions of each such pollutant, and evaluate the air quality impacts.

Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several regulated pollutants that exceed the Significant Emission Rates.

The only PSD pollutant of concern in this permitting action review is NO<sub>x</sub>.

### *Background PSD Review for Previous Permits*

The existing plant is located in Dade County, which is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal AAQS. Potential NO<sub>x</sub> emissions at the plant exceed 250 tons per year. Therefore, the plant is a PSD major facility and new projects must be reviewed for PSD applicability.

Units 1-4 were permitted in accordance with Permit No. PSD-FL-249. Only potential NO<sub>x</sub> emissions exceeded the PSD significant emissions rates and required a BACT determination. The Department established a NO<sub>x</sub> BACT limit of 4.12 lb/MMBtu based on fuel injection timing retardation and 4-pass turbocharger after-cooling. For operational flexibility, the PSD permit regulated operation of the standby generators as a single bank by restricting fuel consumption to no more than 1,415,000 gallons per year. Based on the permitted fuel cap, the NO<sub>x</sub> BACT limit (4.12 lb/MMBtu), the maximum allowable fuel sulfur content (0.05% sulfur by weight), and AP-42 emissions factors for other pollutants (CO, PM/PM<sub>10</sub>, and VOC), the current potential emissions for the existing generating bank are: 82 tons per year of carbon monoxide (CO); 403 tons per year NO<sub>x</sub>; 7 tons per year of particulate matter (PM/PM<sub>10</sub>); 5 tons per year of sulfur dioxide (SO<sub>2</sub>); and 10 tons per year of volatile organic compounds (VOC). An Air Quality Analysis indicated satisfactory compliance with the PSD requirements based on the potential annual NO<sub>x</sub> emissions resulting from the BACT limit and the restricted fuel consumption.

Units 5 and 6 were permitted in accordance with 0250314-009-AC, these units are an addition to the existing bank of standby generators. These new generators represent a more modern version of the existing generators, and include

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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similar control components to minimize NOx emissions to meet the NOx BACT standards established for existing Units 1-4.

The restrictions in this permit ensured that there will be no increased capacity or utilization of the existing standby generating bank (Units 1-4) caused by the addition of these new units. It was anticipated at that time, that operation of a new backup standby generator would displace operation of an existing standby generator. It was concluded that there will be no net increase in NOx emissions and the project was not subject to PSD preconstruction review.

### *Current PSD Review*

During the review of permit 0250314-009-AC in 2005 under the old PSD regulations, the new units (Units 5 and 6) escaped PSD review as explained above. This permitting action is to further reduce emissions and fuel consumption; it will also reauthorize construction of Unit 6 which has not yet been built.

The applicant has reported that both fuel usage and stack emissions have been trending downward over the periods with the reduction in fuel usage due to ongoing cost-cutting efforts and the reduction in stack emission due to retrofit of emissions-reducing equipment including CBOI injection and 4-pass intercoolers as discussed in the preceding section. Fuel usage is currently level at under 900,000 gallons per year and the trend line for the NOx emissions rate is below the 2007 average value of 2.18 lb/MMBtu.

In the application submitted in November 2007, the applicant presented a Hybrid Test for Multiple Types of Emissions Units in accordance with Rule 62-212.400 (2) (a) 3, F.A.C. In the February 14, 2008 response to the Department's incompleteness letter, the applicant reinterpreted the PSD applicability and stated that the report performed was, in effect, a Baseline Actual-to-Potential Applicability Test for Construction of New Emissions Units pursuant to Rule 62-212.400 (2) (a) 2, F.A.C., with the potential emissions based on the emissions for the entire bank of six (6) EMD generators, four (4) existing and two (2) new proposed, under the modified combined fuel cap and common NOx emissions rate. The baseline actual period considered for Units 1-4 was 1997-1999.

There is no significant emissions increase requested for this project. Because the applicant has requested a revision to the limits imposed in Permit 0250314-009-AC, to avoid PSD, a new emissions cap, fuel reductions and reduced emissions limits will be imposed in this permit to avoid PSD. These limits are more stringent than the prior limits therefore, Source Obligation as defined in Rule 62-212.400(12)(g), F.A.C., is not triggered.

The Department believes that this review involves the Hybrid Test for Multiple Types of Emissions Units as originally proposed since the Baseline Actual-to-Potential Applicability Test for Construction of New Emissions Units involves only new units. Therefore, the Department accepts the values in the application tables: Table 4-1 as Baseline Actual Emissions (Units 1-4); Table 4-2 Projected/Potential Emissions (Units 1-6) and Table 4-3 for the Net Emissions Change analysis. Unit 5 does not have operating history and therefore, is a "new unit" as defined in Rule 62-210.200, F.A.C.

The facility will have a NOx cap of 282 TPY for all six units (Units 1-6). Previous permits had regulated these units as a single bank of generators; this permit will not change this determination.

This is a case-by-case determination based on the unique circumstances of the proposed project. It does not establish a precedent for any other projects regardless of the similarities. Each case must be reviewed and evaluated in accordance with the Department's regulations as well as the project-specific details.

### **Federal Regulations**

The proposed project will not increase the potential emissions of any pollutant, including hazardous air pollutants (HAP). Based on the current Title V air operation permit, the existing facility is not considered a major source of HAP. Therefore, the requirements of 40 CFR 63, NESHAP-Subpart ZZZZ, National Emissions Standards for Reciprocating Internal Combustion Engines (RICE), adopted by reference Rule 62-204.800 F.A.C., do not apply.

This project is subject to applicable requirements of 40 CFR 60, NSPS-Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (ICE), adopted by reference Rule 62-204.800 F.A.C.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### 3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the Draft Permit. This determination is based on a technical review of the application, reasonable assurances provided by the applicant and the conditions specified in the Draft permit.

*Permit Engineer: Teresa Heron*  
*Reviewed By: Syed Arif, P.E.*

# DRAFT PERMIT

## PERMITTEE:

Miami-Dade Water & Sewer Department (MDWASD)  
Alexander Orr Jr. Water Treatment Plant  
P.O. Box 330316  
Miami, Florida 33233-0316

### *Authorized Representative:*

Mr. Rafael A. Terrero, P.E., BCEE, M.ASCE

Air Permit No. 0250314-014-AC Facility ID No. 0250314 SIC No. 4941 Unit 6 - Model Installation Change and Operational Modifications Permit Expires: June 30, 2009
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## PROJECT AND LOCATION

This permit authorizes the construction of a General Motors Model No. 16-710G4C-T2 standby generator (Unit 6) and the modification of some specific conditions of previous permit 0250314-009-AC. Unit 6 is a standby generator rated at 2865 kilowatts (kW) that will serve as a backup to the existing bank of five standby generators. The new equipment will be installed at existing Alexander Orr Jr. Water Treatment Plant located in Miami at 6800 SW 87<sup>th</sup> Street in Dade County, Florida.

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

## CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

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Joseph Kahn, Director  
Division of Air Resource Management

(Date)

## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

The project will add the following new emissions unit.

ID	Emission Unit Description
025	<u>Unit 6</u> : This backup standby generator is a General Motors Electro-Motive Diesel (EMD) Model No. 16-710G4C-T2, with a capacity of 4000 brake horsepower (bhp) diesel fueled internal prime mover coupled to a 2865 kW generator.

### REGULATORY CLASSIFICATION

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The facility is a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

### APPENDICES

The following Appendices are attached as part of this permit.

Appendix A. Citation Formats

Appendix B. General Conditions

Appendix C. Common Conditions

### RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.



## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: All documents related to applications for permits to operate shall be submitted to the Air Resources Section of the Department's Southeast District Office at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida 33401. Copies of all such documents shall also be sent to the Miami-Dade County Department of Environmental Resources Management, Air Quality Management Division, 701 Northwest First Court, Suite 400, Miami, Florida 33136.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's Southeast District Office at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida 33401. Copies of all such documents shall also be sent to the Miami-Dade County Department of Environmental Resources Management, Air Quality Management Division, 701 Northwest First Court, Miami, Suite 400, Florida 33136.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats), Appendix B (General Conditions), and Appendix C (Common Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation: At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12)(b), F.A.C.]
8. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Backup Standby Generator Unit 6

This section of the permit addresses the following emissions unit.

#### Emissions Unit No. 25 – Backup Standby Generator Unit 6

Unit 6: This backup standby generator is a General Motors EMD Model No. 16-710G4C-T2 standby 4000 bhp diesel fueled internal prime mover coupled to a 2865 kW generator.

*{Permitting Note: Existing standby generator Units 1 - 4 (Emissions Units 009 – 012) remain subject to the requirements specified in Permit No. PSD-FL-249 (Project No. 0250314-002-AC), except as specified below. Existing standby generator Unit 5 (Emissions Unit 024) remains subject to the requirements specified in Permit No. 0250314-009-AC, except as specified below.}*

#### ADMINISTRATIVE PERFORMANCE REQUIREMENTS

1. Relation to Other Permits: Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of previous permits, which include other restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc for the existing units. [Rule 62-4.070, F.A.C.]

#### EQUIPMENT SPECIFICATIONS

2. Backup Standby Generator: The permittee is authorized to install one, diesel-fired backup standby generators consisting of a 4000 bhp diesel engine and a 2865 kW (continuous) electrical generator set. This unit shall include CBOI (constant beginning of injection) injectors and 4-pass combustion air after-coolers to reduce nitrogen oxides (NOx) emissions. This unit shall be properly operated, tuned, and maintained to minimize NOx emissions. The new unit shall be added to the existing bank of five standby generators.  
[Application and Design]

#### PERFORMANCE RESTRICTIONS

3. Permitted Capacity: The maximum heat input rate for the unit is 27 Million British thermal units (MMBtu) per hour (approximately 197 gallons per hour). *{Permitting Note: The maximum heat input rate is based on a higher heating value of 19,640 Btu/lb and density of 7.034 pounds per gallon of diesel.}* [Rule 62-210.200(PTE), F.A.C.]
4. Authorized Fuel: The unit shall fire only diesel fuel containing no more than 0.05% sulfur by weight. [Application and Rule 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

5. Best Available Control Technology (BACT) Avoidance: In order to avoid PSD significant increase, NOx emissions limit from Unit 6 shall not exceed 3.40 lb/MMBtu.
6. Reasonable Available Control Technology (RACT) Applicability: This backup generator is a Stationary Compression Ignition Internal Combustion Engine and is subject to the RACT requirements of Rule 62-296.570 (4)(b)7, F.A.C., which limits the emissions of NOx to 4.75 pounds per million British thermal units (lb/MMBtu) from oil fired diesel generators. *{Permitting Note: The NOx emission limit of 3.40 lb/MMBtu is more stringent than the RACT requirements.}*

[RACT requirements of Rule 62-296.570 (4)(b)7, F.A.C., Rule 62-4.070(3), F.A.C., and Applicant request dated November 30, 2007]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. Backup Standby Generator Unit 6**

7. New Source Performance Standards (NSPS) Subpart III Applicability: This backup generator is a Stationary Compression Ignition Internal Combustion Engine (CI ICE) and is subject to 40 Code of Federal Regulations (CFR) Part 60, Subpart III. This Unit shall comply with 40 CFR 60, Subpart III only to the extent that the regulations apply to the emission unit and its operations (e.g. non-road, emergency, displacement, capacity, model year selected).

8. NSPS Subpart III Emissions Standards:

NO <sub>x</sub>	CO	HC	SO <sub>2</sub>	PM/PM <sub>10</sub>
6.9 grams per horsepower-hour (gm/HP-hr)	8.5 gm/HP-hr	1.0 gm/HP-hr	0.05% Sulfur	0.40 gm/HP-hr

Note 1. Hydrocarbons are surrogate for VOC.

{The limits are equal to the values corresponding to the Table 1 values cited in the 40 CFR 60, NSPS Subpart III. Manufacturer certification shall be provided to the Department in lieu of actual testing as provided in this Subpart.}

[40 CFR 60, Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (NSPS); Rule 62-204.800 F.A.C.]

**EMISSIONS PERFORMANCE TESTING**

9. Initial Compliance Tests: The unit shall be tested to demonstrate compliance with the 3.40 lb/MMBtu NO<sub>x</sub> avoidance limit and the NSPS standards for NO<sub>x</sub>, CO, and PM/PM<sub>10</sub> (if manufacturer certification is not provided for the NSPS standards) specified in this permit in accordance with EPA test Methods specified in Appendix A of 40 CFR 60 listed below and adopted by reference in Rule 62-204.800, F.A.C. The tests shall also comply with the applicable test requirements specified in Appendix C of this permit. Sampling of the exhaust gas shall be via a rake probe placed into the engine exhaust outlet. The initial test shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.

[Rules 62-4.070(3), 62-297.310(7)(a), 62-212.400(12)b, F.A.C., 40 CFR 60.8 and 40 CFR 60.4211]

10. Annual NO<sub>x</sub> Compliance Tests: During each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>), the unit shall be tested to demonstrate compliance with the 3.40 lb/MMBtu NO<sub>x</sub> emission standard if the unit operated more than 400 hours during the previous 12 months.

[Rules 62-4.070(3), 62-297.310(7)(a), 62-212.400(12)b, F.A.C., and 40 CFR 60.8]

11. Test Methods: Any required tests shall be performed in accordance with the following reference methods or any other test Method approved by the Department.

Method	Description of Method and Comments
5	Determination of PM Emissions from Stationary Sources
7 or 7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Notes: The method shall be based on a continuous sampling train.}
201	Determination of PM with a Mean Diameter of 10 Microns or Less (PM <sub>10</sub> )

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Backup Standby Generator Unit 6

12. Monitors: The owner or operator shall install, calibrate, operate and maintain monitoring devices to monitor and record the fuel flow and hours of operation. [Rule 62-4.070(3), F.A.C.]
13. Fuel Sulfur Content Tests: The owner or operator shall determine the sulfur content of each delivery of diesel fuel received for these emissions units using ASTM D 4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products; and one of the following test methods for sulfur in petroleum products: ASTM D 129-91, ASTM D 2622-94, or ASTM D 4294-90. These methods are adopted by Rule 62-297.440, F.A.C. 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 specified in this permit. [Rules 62-4.070(3) and 62-297.440, F.A.C.]

#### NOTIFICATION, REPORTING AND RECORDS

14. Test Notification: The owner or operator shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
15. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Compliance Authority on the results of each such test. The required test report shall be filed with the Compliance Authority as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Compliance Authority to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the information required in Rule 62-297.310(8), F.A.C. [Rule 62-297.310(8), F.A.C.]
16. Subpart III Notification, Recordkeeping and Reporting Requirements:
  - (a) Owners and operators of non-emergency stationary CI ICE that are greater than 2,237 KW (3,000 HP), or have a displacement of greater than or equal to 10 liters per cylinder, or are pre-2007 model year engines that are greater than 130 KW (175 HP) and not certified, must meet the requirements of paragraphs (a)(1) and (2) of this section.
    - (1) Submit an initial notification as required in Sec. 60.7(a)(1). The notification must include the information in paragraphs (a)(1)(i) through (v) of this section.
      - (i) Name and address of the owner or operator;
      - (ii) The address of the affected source;
      - (iii) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
      - (iv) Emission control equipment; and
      - (v) Fuel used.
    - (2) Keep records of the information in paragraphs (a)(2)(i) through (iv) of this section.
      - (i) All notifications submitted to comply with this subpart and all documentation supporting any notification.
      - (ii) Maintenance conducted on the engine.
      - (iii) If the stationary CI internal combustion is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards.
      - (iv) If the stationary CI internal combustion is not a certified engine, documentation that the engine meets the emission standards.

[40 CFR 60.4214]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. Backup Standby Generator Unit 6

17. Fuel Records: The owner or operator shall maintain records of the sulfur content of each delivery of diesel fuel received for these emissions units. The owner or operator shall make and maintain daily records of diesel fuel consumption for these emissions units at the end of each day. Within ten days of the end of each month, the owner or operator shall make records of monthly diesel fuel consumption from the daily records, and shall make records of the consecutive 12-month diesel fuel consumption to demonstrate compliance with the fuel consumption limits specified in this permit. [Rule 62-4.070(3), F.A.C.]
18. Records of Maintenance: The owner or operator shall maintain records of maintenance activities conducted on this unit including periodic tuning. [Rule 62-4.070(3), F.A.C.]
19. Annual Reporting: Records required by Unit 6 shall be submitted to the Compliance Authority on an annual basis or upon request. [Rule 62-4.070(3) F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### B. Facility Wide Units 1-6

Specific Conditions 4 and 5 from permit 0250314-009-AC, Section 3. A. will be replaced with the following conditions:

#### PERFORMANCE RESTRICTIONS

1. Operational Restrictions, Standby Generating Bank Units 1 -6:

- a. The hours of operation of Units 1-6 are contingent upon fuel consumption. *{Permitting Note: Based on a total fuel consumption and fuel flow rate of approximately 197 gallons per hour, it equates to 6091 hours per year for all Units.}*
- b. The total combined fuel consumption of the standby generating bank (Units 1 – 6) shall not exceed 1,200,000 gallons during any consecutive 12 months.

[Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400(12)(b), F.A.C.]

#### EMISSIONS LIMITS

2. Facility NOx Emissions Cap – Units 1-6: Emissions of NOx shall not exceed 3.40 lb/MMBtu per each unit. (equivalent to a NOx emission rate of approximately 92.5 pounds per hour at 100% engine load for each unit). NOx emissions from the bank of the six standby generators are limited to 282 tons per year (TPY).

[Application; Rules 62-4.070(3) and 62-212.400(12)(b), F.A.C.]

#### NOTIFICATION, REPORTING AND RECORDS

3. Monitoring, Reporting and Recordkeeping Requirements: To demonstrate compliance with the projected actual NOx emissions cap of 282 tons per year for Units 1-6, the permittee shall do the following:

1. The permittee shall monitor NOx emissions; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.

2. The permittee shall report to the Department within 60 days after the end of each year during which records must be generated under subparagraph 62-212.300(1)(e)1., F.A.C., setting out the units annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

- a. The name, address and telephone number of the owner or operator of the major stationary source;
- b. The annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.;
- c. If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
- d. Any other information that the owner or operator wishes to include in the report.

3. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1. and 2., F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

[Rule 62-212.300 F.A.C.]

4. Annual Reporting: Records required for Unit 1-6 shall be submitted to the Compliance Authority on an annual basis or upon request. [Rule 62-4.070(3) F.A.C.]

## SECTION 4. APPENDICES

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Appendix A. Citation Formats

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Appendix III. NSPS Subpart III Requirements for Reciprocating Internal Combustion Engines (ICE)

**SECTION 4. APPENDIX A**  
**CITATION FORMATS**

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*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

**REFERENCES TO PREVIOUS PERMITTING ACTIONS**

Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* "AC" identifies the permit as an Air Construction Permit  
"AO" identifies the permit as an Air Operation Permit  
"123456" identifies the specific permit project number

New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* "099" represents the specific county ID number in which the project is located  
"2222" represents the specific facility ID number  
"001" identifies the specific permit project  
"AC" identifies the permit as an air construction permit  
"AF" identifies the permit as a minor federally enforceable state operation permit  
"AO" identifies the permit as a minor source air operation permit  
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
"FL" means that the permit was issued by the State of Florida  
"317" identifies the specific permit project

**RULE CITATION FORMATS**

Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7



**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy and records that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of non-compliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

**SECTION 4. APPENDIX B**  
**GENERAL CONDITIONS**

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Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (Not Applicable);
  - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
  - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

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*{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}*

**EMISSIONS AND CONTROLS**

1. **Plant Operation - Problems**: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention**: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed**: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited**: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification**: In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions**: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited**: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
8. **General Visible Emissions**: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions**: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

**TESTING REQUIREMENTS**

10. **Required Number of Test Runs**: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

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11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
- a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
  - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
  - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.
- [Rule 62-297.310(4), F.A.C.]
14. Determination of Process Variables
- a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
- [Rule 62-297.310(5), F.A.C.]
15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

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test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**RECORDS AND REPORTS**

19. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. **Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

## SECTION 4. APPENDIX III

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### NSPS REQUIREMENTS FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES

Unit 6 standby generator is regulated as Emissions Unit 025 for the purposes of the Department's Air Resource Management System (ARMS) database. It is subject to the applicable requirements of 40 CFR 60, Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The provisions of this Subpart may be provided in full upon request and are also available beginning at 40 CFR 60.4200 at:

[www.access.gpo.gov/nara/cfr/waisidx\\_07/40cfr60\\_07.html](http://www.access.gpo.gov/nara/cfr/waisidx_07/40cfr60_07.html)

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Wednesday, May 07, 2008 3:31 PM  
**To:** 'R. O'Rourke, P.E., MDWASD:'; 'M. Muthiah, DERM:'; Hoefert, Lee; 'Katy Forney:'; 'Dee Morse, U.S. National Park Service:'  
**Cc:** Hoefert, Lee; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC  
**Attachments:** 0250314.014.AC.D\_.pdf.zip

Tracking:	Recipient	Delivery
<input checked="" type="checkbox"/>	'R. O'Rourke, P.E., MDWASD:'	
<input checked="" type="checkbox"/>	'M. Muthiah, DERM:'	
<input checked="" type="checkbox"/>	Hoefert, Lee	
<input checked="" type="checkbox"/>	'Katy Forney:'	
<input checked="" type="checkbox"/>	'Dee Morse, U.S. National Park Service:'	
<input checked="" type="checkbox"/>	Hoefert, Lee	
<input checked="" type="checkbox"/>	Walker, Elizabeth (AIR)	
<input checked="" type="checkbox"/>	Gibson, Victoria	Delivered: 5/7/2008 3:31 PM

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

## Harvey, Mary

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**From:** Dee\_Morse@nps.gov  
**Sent:** Wednesday, May 07, 2008 4:43 PM  
**To:** Harvey, Mary  
**Subject:** Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

### Return Receipt

Your Miami-Dade Water & Sewer Department - Air Construction  
document: Permit No. 0250314-014-AC

was Dee Morse/DENVER/NPS  
received  
by:

at: 05/07/2008 02:41:19 PM MDT



## Harvey, Mary

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**From:** <Hoefert, Lee >  
**To:** Harvey, Mary  
**Sent:** Wednesday, May 07, 2008 3:35 PM  
**Subject:** Read: Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

Your message

**To:** 'R. O'Rourke, P.E., MDWASD:>'; 'M. Muthiah, DERM:>'; Hoefert, Lee; 'Katy Forney:>'; 'Dee Morse, U.S. National Park Service:'  
**Cc:** Hoefert, Lee; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC  
**Sent:** 5/7/2008 3:31 PM

was read on 5/7/2008 3:35 PM.

## Harvey, Mary

---

**From:** <Hoefert, Lee  
**Sent:** Wednesday, May 07, 2008 3:41 PM  
**To:** Harvey, Mary  
**Subject:** RE: Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

Lee C. Hoefert, P.E.  
Air Program Administrator  
Florida Department of Environmental Protection  
Southeast District  
400 N. Congress Ave., Suite 200  
West Palm Beach, FL 33401  
561-681-6626(Phone), 561-681-6790(Fax)

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**From:** Harvey, Mary  
**Sent:** Wednesday, May 07, 2008 3:31 PM  
**To:** 'R. O'Rourke, P.E., MDWASD:'; 'M. Muthiah, DERM:'; Hoefert, Lee; 'Katy Forney:'; 'Dee Morse, U.S. National Park Service:'  
**Cc:** Hoefert, Lee; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

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Thank you,

DEP, Bureau of Air Regulation

5/7/2008

## Harvey, Mary

---

**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Thursday, May 08, 2008 7:50 AM  
**Subject:** Read: Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

Your message

**To:** 'R. O'Rourke, P.E., MDWASD:'; 'M. Muthiah, DERM:'; Hoefert, Lee; 'Katy Forney:'; 'Dee Morse, U.S. National Park Service:'  
**Cc:** Hoefert, Lee; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC  
**Sent:** 5/7/2008 3:31 PM

was read on 5/8/2008 7:50 AM.

## Harvey, Mary

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**From:** O'Rourke, Richard M. (WASD) [ROROU01@miamidade.gov]  
**To:** Harvey, Mary  
**Sent:** Wednesday, May 07, 2008 4:57 PM  
**Subject:** Read: Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

Your message

**To:** ROROU01@miamidade.gov  
**Subject:**

was read on 5/7/2008 4:57 PM.

## Harvey, Mary

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**From:** Muthiah P.E., Mallika [MuthiM@miamidade.gov]  
**Sent:** Thursday, May 08, 2008 12:13 PM  
**To:** Harvey, Mary  
**Subject:** RE: Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

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**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Wednesday, May 07, 2008 3:31 PM  
**To:** R.O'Rourke; P.E; O'Rourke, Richard M. (WASD); Muthiah P.E., Mallika; Hoefert, Lee; Katy Forney;; Dee Morse, U.S. National Park Service:  
**Cc:** Hoefert, Lee; Walker, Elizabeth (AIR); Gibson, Victoria  
**Subject:** Miami-Dade Water & Sewer Department - Air Construction Permit No. 0250314-014-AC

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Thank you,

DEP, Bureau of Air Regulation

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5/8/2008