

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

June 10, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jorge S. Rodriguez, P.E.
Assistant Director - Water
Miami-Dade Water & Sewer Department
3071 SW 38th Avenue
Miami, Florida 33146-1520

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

Dear Mr. Rodriguez:

The Department has received your application for installation of three natural gas fueled engine driven pump sets and one diesel fueled standby generator to replace existing five diesel engine driven pump sets. The application was received on May 13, 2002. In order to continue processing your application, the Department will need the additional information below. Should your response to any of the following items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The cover page of the application refers to replacement of four existing diesel fueled engine driven pumps and generator whereas the cover letter alludes to the replacement of five existing diesel fueled engine driven pump sets. Please provide clarification.
2. The application under II. A. 7. Facility Comment (page 7) refers to six standby generators providing standby electrical power while the facility plot plan under Attachment 2 indicates only 4 standby generators. Please provide clarification.
3. Were/are the existing pumps subject to NO_x RACT? Please confirm that no pump engine set can generate electrical power other than set number 1.
4. The application on page 6 under Construction/Modification Information section refers to engine driven pumps No. 3, No. 4 and No. 5 are proposed as replacements while under III. A. 9. General Emissions Unit Information (page 12) indicates pump engine nos. 2, 3 & 4 will be replaced. Please provide clarification.
5. The application on page 20 uses 1.8 g/bhp-hr CO emission factor. Please indicate the basis for using that number.
6. The application on page 44 under section 3 shows the potential emissions for CO to be 42.924 tons/year. Please indicate how was that number arrived at.

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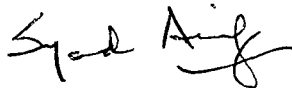
7. Page 1 of Attachment 3 lists past actual emissions for all the pollutants. Please show all the calculations in arriving at tons per year numbers for NOx for pump engines 1, 3, 4 and 5.
8. Please indicate whether the emission factors used in the calculations were based on emissions testing or manufactured supplied data. Please provide necessary documentation to verify the emission factors used in the application.
9. Please indicate the load percent at which the engines will be operating most of the time. If the engines will be operating at less than 100% load some of the time, provide the actual operating hours under those conditions.
10. The Department in a telephonic conversation with Mr. Richard O'Rourke of your staff understands that the request for concurrent review of Title V air operation permit revision and air construction permit application will be withdrawn. The Department is anticipating a letter of withdrawal. The Department will proceed with the review of the air construction permit application and you will submit a separate application at a later date for Title V air operation permit revision.
11. The Department understands in conversations with Mr. Richard O'Rourke that a narrative description of the project will be submitted. This should be of the same style as one used for PSD applications.

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

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

I will be happy to meet and discuss the details with you and your staff. If you have any questions, please call me at 850/921-9528.

Sincerely,



Syed Arif, P.E.

New Source Review Section

sa

cc: Tom Tittle, DEP Southeast District
Patrick Wong, Dade County DERM
Gregg Worley, EPA Region 4
Richard O'Rourke, WASD (via e-mail)

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1. Article Addressed to:

Jorge S. Rodriguez, P.E.
 Assistant Director - Water
 Miami-Dade Water & Sewer Department
 3071 SW 38th Avenue
 Miami, FL 33146-1520

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