TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Wheelabrator South Broward, Inc.
4400 South State Road 7
Fort Lauderdale, Florida 33414

South Broward Waste-to-Energy Facility
Facility ID No. 0112119

PROJECT

Draft Permit No. 0112119-017-AC/PSD-FL-105E
Application for Minor Source Air Construction (AC) Permit
Waste (Fuel Slate) Changes & Miscellaneous Revisions

COUNTY

Broward County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

November 14, 2013

1. GENERAL PROJECT INFORMATION

1.1. Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U.S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

1.2. Facility Description and Location

This facility is an existing municipal waste combustor (MWC) facility categorized under Standard Industrial Classification No. 4953. The existing South Broward Waste-to-Energy Facility is located in Broward County at 4400 South State Road 7, Fort Lauderdale, Florida.

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

1.3. Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- This facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

1.4. Project Description

The applicant applied on August 13, 2013, to the Department for a minor source air construction permit. The minor source air construction permit is for combustion of higher rates of non municipal solid waste (MSW) materials ("non-hazardous solid and liquid wastes"), waste (fuel slate) revisions and a miscellaneous revision at the existing municipal waste combustor facility. The higher rate requested is to increase of the total quantity of non-MSW materials received as segregated loads from 5% to 20%. The miscellaneous revision is for removal of the beryllium emission limit.

1.5. Application Processing Schedule

- Application for Air Construction Permit received on August 13, 2013.
- 1st Request for Additional Information (RAI) sent on August 28, 2013.
- Additional Information Response from Applicant received on September 24, 2013 (complete).

{Documents specifically related to this project are posted and available on the Department's world wide website at http://appprod.dep.state.fl.us/air/emission/apds/default.asp by entering the project number shown above.}

1.6. Relevant Documents

- PSD-FL-105 (Municipal Solid Waste Combustor Unit Nos. 1, 2 & 3).
- PSD-FL-105B (Added waste (fuel slate) specific conditions).
- Permit No. 0112119-015-AV, Current Title V Air Operation Permit.
- HB 503, an amendment to Section 403.707(1), F.S. (2012).

2. PSD APPLICABILITY

2.1. General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source 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 following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" (SERs) defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as PM; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average. **Table 1** provides a list of the SER for applicable to the Wheelabrator South MWC facility.

If the increase in emissions from the project exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

TABLE 1 - LIST OF SIGNIFICANT EMISSION RATES BY PSD-(AIR) POLLUTANT RELEVANT TO THE FACILITY [1]

PSD-(Air) Pollutant	SER, tons/year	PSD-(Air) Pollutant	SER, tons/year
PM	25	CO	100
PM_{10}	15	NO_X	40
$PM_{2.5}$	10	Ozone [NO_X] [3]	40
$PM_{2.5}$ [NOx] [2]	40	Volatile Organic Compounds (VOC)	NA [4]
$PM_{2.5}$ [SO_2] [2]	40	Ozone [VOC] [3]	40
Lead (Pb)	0.60		
Mercury (Hg)	0.10	Reduced Sulfur Compounds (RSC) [H_2S]	10
MWC metals [measured as PM]	15	Total Reduced Sulfur (TRS) [H_2S]	10
		SO_2	40
		Sulfuric Acid Mist (SAM)	7
		Fluorides (F)	3
		HCl	NA [4]
		MWC acid gases [SO_2 + HCl]	40
		MWC organics [dioxins/furans]	3.5×10^{-6}

1. There is a federal SER of 75,000 tons/year for Greenhouse Gases (GHG) as carbon dioxide equivalent (CO_2e) that has not been incorporated into Department rules.
2. $PM_{2.5}$ is also regulated through precursors [NO_X and SO_2].
3. Ozone (O_3) is regulated through precursors [VOC and NO_X].
4. NA means not applicable.

3. APPLICANT REVIEW

3.1. Background

The applicant applied on August 13, 2013, to the Department for a minor source air construction permit. The minor source air construction permit is for combustion of higher rates of non-MSW materials ("non-hazardous solid and liquid wastes"), waste (fuel slate) revisions and a miscellaneous revision at the existing municipal waste combustor facility. The higher rate requested is to increase of the total quantity of non-MSW materials received as segregated loads from 5 percent (%) to 20%. The miscellaneous revision is for removal of the beryllium emission limit.

3.2. Waste (Fuel Slate) & Be Emission Limit Removal Requested Changes

In Part II of the permit application received on August 13, 2013, the applicant requested specific changes to the wastes (fuel slate) specific conditions in the current valid Title V air operation permit No. 0112119-015-AV. These specific conditions contain very specific types and descriptions of fuels/wastes allowed to be combusted in municipal solid waste combustor Unit Nos. 1, 2 & 3. In the Part II of the permit application on page 6 (last page), the applicant also requested removal of the beryllium emission limit.

Specifically, the applicant requested:

- Combustion of higher rates of non-MSW materials ("non-hazardous solid and liquid wastes"), e.g., increase the total quantity of non-MSW materials received as segregated loads from 5% to 20%;
- Waste (fuel slate) revisions; and,
- A miscellaneous revision - removal of the beryllium (Be) emission limit.

In support of the requests, the applicant cited the legislation effective in 2012, HB 503, an amendment to Section 403.707(1), F.S. which directs the Department to "*... allow waste-to-energy facilities to maximize acceptance and processing of nonhazardous solid and liquid waste*."

3.3. Waste (Fuel Slate) Requested Change's Effect on Air Pollutant Emissions

The applicant indicated that the combustion of "non-hazardous solid and liquid waste" (segregated loads) in MWC Unit Nos. 1, 2 & 3 at the higher rates "*is not expected to change the emission characteristics since the material making up segregated loads is fundamentally not different than the current waste and the air pollution control equipment limit emissions to very low levels*."

To demonstrate that there will be no increase in air pollutant emissions from the combustion of higher quantities of "non-hazardous solid and liquid waste" (segregated loads) in MWC Unit Nos. 1, 2 & 3, the applicant proposed to measure, track and report air pollutant emissions for up to five years from completion of the project in accordance with Rule 62-212.300(1)(e), F.A.C.

4. DEPARTMENT REVIEW

This municipal solid waste combustor (MWC) plant was originally permitted in 1987 under PSD-FL-105. The South Broward Waste-to-Energy Facility began commercial operation in 1991.

A typical mass burn, waste-to-energy facility process overview is posted and available on Wheelabrator Technologies Inc.'s website.[1]

4.1. Waste (Fuel Slate) Requested Changes

The applicant specifically requested that the 5% restriction on non-MSW material received as segregated loads and burned cited in Specific Conditions **A.4.**f. of the current Title V air operation permit No. 0112119-015-AV to be changed from 5% to 20%.

The Department has identified that Specific Conditions **A.47.**c of the current Title V air operation permit No. 0112119-015-AV pertaining to recordkeeping for segregated loads also needs to be changed from 5% to 20%.

Also, Department has identified that the authorization to burn "non-hazardous solid and liquid waste" needs to be inserted as a new subparagraph "g." to Specific Condition **A.4.** of the current Title V air operation permit No. 0112119-015-AV.

The waste (fuel slate) permit specific conditions originate from underlying AC/PSD permits. These permit specific conditions cannot be revised in the Title V air operation permit; the underlying AC/PSD permits must be revised.

{Note: a separate permitting action will be required to make the necessary change to the facility's current Title V Air Operation permit.}

4.2. Waste (Fuel Slate) Requested Change's Effect on Air Pollutant Emissions

For the same reason as indicated by the applicant, the Department expects no increase in air pollutant emissions from the combustion of higher quantities of "non-hazardous solid and liquid waste" (segregated loads) in MWC Unit Nos. 1, 2 & 3 due to the similarity of the characteristics of the "non-hazardous solid and liquid waste" (segregated loads) and the traditional wastes/fuels they will replace. Unit Nos. 1, 2 & 3 are identical mass-burn municipal solid waste combustors.

Air pollutant emissions are well controlled at the South Broward Waste-to-Energy Facility. Air pollutant emission control techniques, measures and devices on each unit include:

- A selective non-catalytic reduction (SNCR) system for the control of NO_X emissions;
- Good combustion practices to minimize NO_X, CO and VOC emissions;
- A spray dryer absorber (SDA) scrubber system for the control of acid gas emissions such as SO_2 and HCl;
- An activated carbon injection (ACI) system for the control of Hg and dioxin/furan emissions; and,
- A baghouse filter system for the control of $PM/PM_{10}/PM_{2.5}$ and Hg emissions.

Air pollutant emissions from each unit are monitored by certified continuous emissions monitoring systems (CEMS) for the following air pollutants: SO_2, NO_X and CO. Stack testing is performed for the following air pollutants: PM, Cd, Hg, Pb, HCl and dioxin/furan. Each unit is also equipped with a certified continuous opacity monitoring system (COMS) for visible emissions (VE).

4.3. Regulatory Review for Project - Restrictions on MSW

4.3.1. MSW as Defined in Federal (U.S. EPA) Regulations - 40 CFR 60, Subpart Cb/Eb

Municipal solid waste or municipal-type solid waste or MSW is defined in the federal regulations - 40 Code of Federal Regulations (CFR) 60, Subpart Cb, Emissions Guidelines (EG) and Compliance Times for Large Municipal Waste Combustors (MWCs).

The South Broward Waste-to-Energy Facility MWC units are 'existing' MWC units regulated under the EG 40 CFR 60, Subpart Cb. The federal regulations, 40 CFR 60, Subpart Cb (amended May 10, 2006), applicable to the South Broward Waste-to-Energy Facility MWC units were adopted by reference in Rule 62-204.800(9)(b), Florida Administrative Code (F.A.C.), (Effective 12/01/2012) [2]. Of particular note is that the EG 40 CFR 60, Subpart Cb, cross references applicable requirements that are contained in the 40 CFR 60, Subpart Eb, New Source Performance Standards (NSPS) for Large Municipal Waste Combustors. 40 CFR 60, Subpart Eb (amended May 10, 2006) were adopted by reference in Rule 62-204.800(8)(b), F.A.C., (Effective 12/01/2012) [3]. Basically, the EGs 40 CFR 60, Subpart Cb apply to 'existing' MWC units while the NSPS 40 CFR 60, Subpart Eb apply to 'new' MWC units. The cross references contained within Subpart Cb to Subpart Eb do not impose the more stringent emission standards/limitations from Subpart Eb onto 'existing' MWC units.

4.3.2. MSW as Defined in the Laws of the State Florida

Municipal solid waste (MSW) is defined in state law in Florida, in Section 403.706(5), Florida Statutes (F.S.) (as of 2012) [4].

4.3.3. MSW as Defined in the Rules of the State Florida

MSW is not specifically defined in the state air pollution rules, Rule 62-210 through 297, Florida Administrative Code (F.A.C.). However, the following terms defined in the state air pollution rules in Florida, Rule 62-210, F.A.C. (Effective 03/28/2012) are relevant to the request.

4.3.4. Federal (U.S. EPA) Regulations Applicability

The combustion of solid waste is subject to Section 129, Solid Waste Combustion of the Clean Air Act (CAA). Section 129, Solid Waste Combustion of the CAA includes 40 CFR 60 Subparts Cb/Eb. The combustion of "non-hazardous solid and liquid waste" in MWC units is therefore regulated under 40 CFR 60, Subparts Cb/Eb. 40 CFR 60, Subparts Cb/Eb does not contain any new or additional applicable requirements for when the MWCs are combusting "non-hazardous solid and liquid waste."

The combustion of hazardous waste is subject to the new MACTs under 40 CFR 63. The combustion of "non-hazardous solid and liquid waste" in MWC units is therefore not subject to any of U.S. EPA's new MACTs under 40 CFR 63. [5]

4.3.5. Regulatory Review for Project - Restrictions on MSW - Conclusions

After reviewing the cited federal (U.S. EPA) regulations, the law & rules of the State of Florida, nothing specifically precludes the applicant's request to burn higher quantities of "non-hazardous solid and liquid waste" (segregated loads).

4.4. Permitted Quantity of Non-MSW Materials ("Non-hazardous Solid and Liquid Wastes")/Segregated Loads

Under the Lake County RRF segregated load increase project, Covanta indicated that the upper limit for non-MSW material ("non-hazardous solid and liquid wastes")/segregated loads for the Lake County RRF MWC Unit Nos. 1 & 2 was 20% considering the design of the units.[6] The applicant's rationale for an upper limit of 20% for the Lake County RRF units was based on the Tulsa and the Huntsville MWC facilities routinely operating up to 20% of segregated loads "*without significant effects to the boilers and the air pollution control systems*." The Tulsa and the Huntsville MWC facility test results provided reasonable assurances of compliance with the applicable concentration based emission standards/limitations by the Lake County RRF MWC Unit Nos. 1 & 2 at segregated loads of up to 20%. Given that similar MWC units demonstrated compliance with the emission standards/limitations applicable to the Lake County RRF units, that no significant effects to the boilers and the air pollution control systems at the similar

MWC units were observed and that the upper limit on the units is 20% considering the design of the units, an upper limit (maximum) of 20% of segregated loads was deemed appropriate for the Lake County RRF units.

The South Broward Waste-to-Energy Facility requested an increase in the total quantity of non-MSW materials received as segregated loads from 5% to 20%. The South Broward MWC Unit Nos. 1, 2 & 3 are mass-burn units with Babcock Wilcox boilers. The Lake County RRF units are also mass-burn units with Babcock Wilcox boilers.

For the same reason as in the Lake County RRF segregated load increase project, at quantities above 20% of segregated loads the Department does not have reasonable assurances of compliance by MWC units with applicable air pollutant emission/standards. An upper limit of 20% as requested by the South Broward Waste-to-Energy Facility is acceptable to the Department.

4.5. Permit Requirements

Only one of the ten municipal waste combustor facilities in the State of Florida is permitted to accept and combust up to 20% of non-MSW material ("non-hazardous solid and liquid wastes"). The Lake County RRF was permitted on March 5, 2013 to accept and combust up to 20% of non-MSW material ("non-hazardous solid and liquid wastes"). The Title V air operation permits for the 10 MWC plants in Florida contain similar "fuel slate" (waste) language for statewide consistency. For consistency among the MWC plants the South Broward Waste-to-Energy Facility "fuel slate" (waste) language was edited slightly.

The "fuel slate" language in the South Broward Waste-to-Energy Facility current, valid Title V air operation permit contains a prohibition to burn hazardous waste (see Specific Condition **A.4.**b.(1)(e)). The burning of hazardous waste is regulated by other federal regulations. The applicant screens wastes at the plant under a standard operating procedure. As in previous permitting actions and for this permitting action, in order to provide the Department continued reasonable assurances that a "non-hazardous solid and liquid waste" (non-MSW material) received as a segregated load is not a hazardous waste the owner/operator is required by the permit to screen each material and to keep a record of such characterization at the plant.

Initial compliance demonstration (testing) at higher non-MSW material ("non-hazardous solid and liquid waste") quantities is specified in the permit to provide the Department reasonable assurances that the existing emission standards & limits are complied with by the South Broward Waste-to-Energy Facility MWC Unit Nos. 1, 2 & 3.

4.6. PSD Applicability for Project

Rule 210.200(252), *Projected Actual Emissions*, F.A.C. (Effective 03/28/2012) requires an emissions comparison for modifications to emission units. Basically, baseline actual emissions (BAEs) are compared to future emissions or referred to as projected actual emissions (PAEs).

This project involves modifying the 'fuel slate' (waste) language which is in all MWC plant permits. The Lake County Resource Recovery Facility (RRF), Air Construction (AC) Permit Revision, Project No. 0690046-014-AC/PSD-FL-113I project was the first such project basically somewhat establishing precedence for the other 10 MWC plants in Florida. This project, like the Lake County segregated loads increase project, involved the regulatory application of an emissions comparison under PSD NSR (known as baseline to projected actual emissions).

In the first regulatory application of the emissions comparison of the BAEs to PAEs in the Lake County segregate loads increase project the subparagraph "(d)" of Rule 210.200(252), F.A.C. had been elected by the applicant, thus restricting emissions under the AC permit. Initially, in the permit application submitted the applicant added quantities just below the PSD SERs to estimate the PAEs like what Lake County had done. On September 24, 2013, the applicant provided revised PAEs based on a calculation of the maximum estimated emissions. Therefore, this project is different from the Lake County segregate loads increase project as the applicant did provide an estimate for the PAEs.

As allowed by Rule 210.200(252), F.A.C. the Department accepts the applicant's BAE and PAE estimates.

The air construction permit application for the project to avoid PSD BACT was based in whole or in part on projected actual emissions. The baseline actual emissions and the projected actual emissions for the *existing* MWC Unit Nos. 1, 2 and 3 were provided by the applicant and are shown in **Table 2** below.

TABLE 2 - BASELINE ACTUAL EMISSIONS VS. PROJECTED ACTUAL EMISSIONS USED UNDER THIS PROJECT.

PSD-(Air) Pollutant	Baseline Actual Emissions, TPY (tons/year)	Projected Actual Emissions, TPY	Increase (+)/Decrease (-) in Emissions, TPY	PSD SER, TPY	PSD SER exceeded?
PM	6.05	6.5	+0.455	25	No
PM_{10}	6.05	6.5	+0.455	15	No
$PM_{2.5}$	6.05	6.5	+0.455	10	No
Pb	0.03	0.04	+0.016	0.60	No
Hg	0.04	0.04	+0.006	0.10	No
F	0.34	0.35	+0.010	3	No
NOx	1,370.24	1,386.11	+16	40	No
CO	93.39	97.44	+4	100	No
VOC	11.52	11.81	+0.29	40	No
SO_2	161.16	181.48	+20	40	No
SAM	24.68	27.79	+3.111	7	No
MWC acid gases [SO_2 + HCl]	237.61	261.88	+24.272	40	No
MWC organics [dioxins/furans]	1.50E-05	1.80E-05	+3.00E-06	3.5×10^{-6}	No
Total GHGs (CO_2e)	745,119.8	749,577.3	+4,457.5	75,000	No

Since the units are already equipped with CEMS for SO_2, NOx & CO, changes to these individual air pollutant emissions when burning higher quantities of non-MSW materials ("non-hazardous solid and liquid wastes") can be easily evaluated for initial compliance demonstration and that PSD is avoided.

Since the units routinely perform stack tests for the following air pollutants: PM, Cd, Hg, Pb, HCl, dioxin/furan, changes to these individual air pollutant emissions when burning higher quantities of non-MSW materials ("non-hazardous solid and liquid wastes") can also be easily evaluated for initial compliance demonstration and that PSD is avoided.

The individual MWC units at the South Broward Waste-to-Energy Facility are much larger than those at the Lake County RRF. The Lake County RRF has two 250 TPD units. The South Broward Waste-to-Energy Facility has three 750 TPD units.

Air pollutant emissions can be measured and tracked to determine whether or not there were in fact any net emission increases resulting from this project. Specific requirements to measure, track and report air pollutant emissions of concern associated with this project are placed in the AC permit.

Based on what the applicant has provided and based on the permit processor's review of another similar air permitted project namely the Lake County one, there are no expected significant emission rate increases from the proposed project. The project therefore is not subject to PSD preconstruction review.

4.7. Be Emission Limit Removal Requested Changes

Specific Condition 1.a, in PSD-FL-105B limits beryllium (Be) emissions from each unit to 0.001 mg/dscm.

4.7.1. Applicant's Requested Change:

The applicant requested the Be emissions limit to be removed for MWC Nos. 1, 2 and 3.

4.7.2. Department's Response:

Rule 62-210.200 (Significant Emission Rates), F.A.C. no longer lists Be, therefore, Be was effectively "delisted" as a PSD pollutant in this rule change effective August 15, 1999. The Be emissions limit will be removed from permit PSD-FL-105B. This permitting action will effectively render the Be renewal testing in the current Title V air operation permit No. 0112119-015-AV as reflected in Specific Condition **A.20** obsolete. This specific condition will be removed when the Title V permit is next revised or renewed.

5. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state rules and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions.

Mr. Scott M. Sheplak, P.E. is the permit processor responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting him by telephone at 850/717-9074 or by e-mail at scott.sheplak@dep.state.fl.us in the Department's Office of Permitting and Compliance at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

References

[1] Wheelabrator Technologies Inc. Wheelabrator South Broward Inc. Plant Facts, Animated WTE Video. http://www.wheelabratortechnologies.com/plants/waste-to-energy/wheelabrator-south-broward-inc/. Accessed on 10/31/2013.

[2] Florida DEP, Division of Air Resource Management. Current Air Rules. Florida DEP World Wide Website: http://www.dep.state.fl.us/air/rules/fac/62-204.pdf. Accessed on 12/17/2012.

[3] Florida DEP, Division of Air Resource Management. Current Air Rules. Florida DEP World Wide Website: http://www.dep.state.fl.us/air/rules/fac/62-204.pdf. Accessed on 12/17/2012.

[4] Florida Legislature. Florida Statutes. Florida Online Sunshine World Wide Website: http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0400-0499/0403/0403ContentsIndex.html&StatuteYear=2012&Title=%2D%3E2012%2D%3EChapter%20403. Accessed on 12/17/2012.

[5] U.S. EPA - Wastes - Hazardous Wastes - Treatment & Disposal. Air Emissions Regulations for Hazardous Waste Combustors - Combustion Home. NESHAP Toolkit - Background. http://www.epa.gov/epawaste/hazard/tsd/td/combustion.htm#emissions. Accessed on 12/19/2012.

[6] Florida DEP, Division of Air Resource Management. Technical Evaluation & Preliminary Determination document for Permit No. 0690046-014-AC/PSD-FL-113I, Lake County RRF Segregated Load Increase Project. Florida DEP World Wide Website: http://appprod.dep.state.fl.us/air/emission/apds/default.asp.