FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Revision by:

Mr. Brian J. Roche
VP/General Manager Water Wastewater Systems
JEA
21 West Church Street, T -16
Jacksonville, Florida 32202

FINAL Permit No. 0310166-015-AV
City of Jacksonville, JEA
Buckman Water Reclamation Facility
Duval County

Enclosed is the FINAL Permit, No. 0310166-015-AV, for the Title V Air Operation Revision. The facility is located in Duval County. This permit revision is issued pursuant to Chapter 403, Florida Statutes (F.S.). There **were no** comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit revision) has the right to seek judicial review of the permit revision pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

Richard S. Rachal III, P.G.
Program Administrator
Waste and Air Resource Management Program

RSR:rfs

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent by certified mail or electronically (with Received Receipt) before the close of business on **April 22, 2014** to the person(s) listed or as otherwise noted:

Mr. Daniel N. Hlaing, P.E., JEA (hlaidn@jea.com**)**
Mr. Brian J. Roche, JEA (ROCHBJ@JEA.COM)
Ms. Natasha Hazziez, U.S. EPA Region 4: Hazziez.natasha@epa.gov
Ms. Ana Oquendo, EPA Region 4: oquendo.ana@epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk) (Date) 04/22/14

FINAL Determination

I. Comment(s).

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit.

Comments were received from Mr. Daniel N. Hlaing, P.E., JEA on March 28, 2014.

The following permit sections are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight.

1. **EU013 and EU014: Please change the rated capacities of Boilers 2 and 3 from 5 MMBtu/hr (as stated in the original application) to 3.8 MMBtu/hr (as installed). Attached are pictures of their name plates.**

   Response: Based on the request, Subsection F., Condition Nos. F.1.and F.2. are changed as follows:

   F.1. Permitted Capacity- Boiler No. 2. The boiler heat input shall be limited to ~~5~~ 3.8 MMBtu per hour when firing natural gas, bio-gas, or a combination of both fuels.

   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB; Permit No. 0310166-009-AC; Permit No. 0310166-013-AC]

   F.2. Permitted Capacity- Boiler No. 3. The boiler heat input shall be limited to ~~5~~ 3.8 MMBtu per hour when firing natural gas, bio-gas, or a combination of both fuels.

   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB; Permit No. 0310166-009-AC; Permit No. 0310166-013-AC]

2. **O&M Plan – AV: With respect to EU017, in order to check the bags, the baghouse needs to be shut down and opened up, which requires several man hours. Therefore, we propose to monitor pressure differentials across the baghouse as well as the odor control unit 2 on a regular basis (per manufacturer's recommendations), in lieu of checking the bags monthly. If the pressure drop falls out of the recommended range (1" to 3" w.c. for the baghouse, and 3" to 5" w.c. for the odor control unit #2), an investigation will be initiated and a correction action may be taken if needed. If the pressure drop falls out of the recommended ranges by 7" or more, a correction action will be taken immediately.**

   Response: Based on the request, the O& M Plan is revised as attached.

3. **EU016 (Open Flare), Section H, Page 35 of 44: Caterpillar engine should not have been crossed out in the description of this emission unit.**

   Response: Based on this comment, Subsection H, Emissions Unit 016 Description is corrected as follows:

E.U. ID No.	Brief Description
016	Open Air Flare. Flare for the combustion of bio-gas during emergency situations when the bio-gas cannot be combusted in the sludge dryer, Caterpillar Engine (EU015) or the boiler(s) and for operational flexibility. The estimated maximum combustion capacity of the flare is 438 million cubic feet per year.

4. **Condition I.3 or Subsection I (Common Conditions for EU Nos. 007, 013, 014, 015, 016, 018), Page 38 of 44: This condition requires submittal of semi-annual reports by the end of the month following completion of each six month period (i.e., within 30 days). We request an extension on the semi-annual reports submittal to 60 days, since 30-day is a tight timeframe to process 24 weekly H2S analysis reports, collect fuel usage data, calculate SO2 emissions, and prepare the report. In fact, neither the applicable rule (Rule 62-213.440(1)(b)3.a., F.A.C.) nor in RR4 of Appendix RR specifies a due date. Furthermore, the emission units in this group are not subject to a New Source Performance Standard (NSPS).**

   Response: Based on this comment, Subsection I, Condition I.3. is revised as follows:

   I.3. Semi-annual reports of the quantity and quality of bio-gas produced [including the weekly gas analysis test reports (only submit semi-annually)], and the calculated sulfur dioxide emissions on a semi-annual basis shall be submitted to the Compliance Authority. These reports are due ~~by the end of the month~~ no later than 60 days following completion of each six month period (i.e.: JAN-JUN reporting period due ~~July~~ August 31, JUL-DEC reporting period due ~~January~~ ~~31~~ March 1/2).

   [Permit No. 0310166-009-AC; Permit No. 0310166-013-AC]

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

JEA
Buckman Water Reclamation Facility

OPERATION AND MAINTENANCE PLAN

(EU No.: 017)

Emission Unit Description:

Control Equipment Specifications

Manufacturer: _____ Design Air Flow: _____CFM

Model Number: _____ Air to Cloth Ratio: _____

Type: Baghouse dust collector Bag Material: _____

Cleaning Mechanism: Pulse jet ☐ Reverse Air ☐ Mechanical ☐ Other ☐ Please describe:

_____

_____

_____

_____

MONTHLY CHECK

Check appropriate box(es) and describe action taken, including date, under comments

Date of Inspection:_____ Inspector's Name: _____

Pressure Drop Across Baghouse: _____ Within Range (1" to 3" w.c.): Y ☐ N ☐

Corrective Action Taken: _____

_____

_____

Fan: Good condition ☐ Maintenance Performed ☐

Baghouse Structure: Good condition ☐ Needs repair ☐

Pressure Drop Across Odor Control Unit No. 2: _____ Within Range (3" to 5" w.c.): Y ☐ N ☐

Corrective Action Taken: _____

_____

_____

JEA
Buckman Water Reclamation Facility

OPERATION AND MAINTENANCE PLAN

(EU No.: 017)

Emission Unit Description:

ANNUAL CHECK

Check appropriate box(es) and describe action taken, including date, under comments

Bags: Good condition ☐ Needs repair or replacement ☐

Baghouse Clean Air Side:

Clean ☐ Light Dust ☐ Heavy Dust ☐

Comments: _____
_____
_____