PERMITTEE

Covanta Lake II, Inc.
3830 Rogers Industrial Park Road
Okahumpka, Florida 34762

PERMITTING AUTHORITY

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

PROJECT

Permit No. 0690046-014-AC/PSD-FL-113I
Air Construction Permit
Waste (Fuel Slate) Changes & Miscellaneous Revisions at the Existing Municipal Waste Combustor Facility

PUBLIC NOTICE

The Department distributed a draft air construction permit package on January 22, 2013. The applicant published the Public Notice in the Orlando Sentinel in Lake County, Florida on January 28, 2013. The Department received the proof of publication on February 6, 2013.

No requests for an administrative hearing or requests for an extension of time in which to file a petition for an administrative hearing were received by the Agency Clerk in the Department's Office of General Counsel.

COMMENTS

No comments on the permit were received from the public or the U.S. EPA Region 4 Office during the 14-day public comment period. Comments on the permit were received from the Applicant during the 14-day public comment period. The comments are addressed below.

All changes are emphasized with yellow highlight in this document only. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strike through~~.

Comments from the Applicant submitted via e-mails on February 15 & 22, 2013

Comments

1. Table - Page 4 of 15 of the Draft Permit - PSD Applicability Analysis. The applicant indicated in their February 15 & 22, 2013 letters that the baseline and projected actual NOx emissions were corrected based on 2011 & 2012 data. Actual NOx emissions from MWC Unit No. 1 in 2011 & 2012 were 252.75 & 256.15 TPY, respectively. Actual NOx emissions from MWC Unit No. 2 in 2011 & 2012 were 239.78 & 242.69 TPY, respectively. The baseline actual emissions from MWC Unit Nos. 1 & 2 are therefore 495.7 TPY.

***Response*:** The Department makes the requested corrections to the baseline and projected actual NOx emissions. The table is corrected to read as follows:

"**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 in Emissions, TPY	PSD SER, TPY	PSD SER exceeded?
…	…	…	…	…	…
NOx	~~393~~495.7	~~432.9~~535.6	39.9	40	No

…	…	…	…	…	…

… "

2. Table - Page 4 of 15 of the Draft Permit - PSD Applicability Analysis. The applicant indicated in their February 15, 2013 letter that it is their understanding that the "TPY' values shown in the 3rd column of the table shown on Page 4 of 15 labeled as "**Projected Actual Emissions, TPY**" in the draft permit are enforceable permit limits not to be exceeded. The applicant suggested that the final permit to the extent possible more clearly indicate that these values are indeed permit limitations.

***Response*:** The PSD-air pollutants needing to be limited by this permit can be established clearly in a specific condition. The Department makes the requested clarifications/corrections. The TPY values for the affected PSD-air pollutants needing to be limited by this permit are further addressed below.

Department Initiated Corrections

The Department identified the need to make several further corrections/clarifications in the final permit.

1. Table - Page 4 of 15 of the Draft Permit - PSD Applicability Analysis.

The PSD-(Air) pollutants shown in the table from the draft permit are addressed further here.

Pb & Hg

The Pb and Hg "projected actual emissions" needed to be corrected because they had exceeded the permitted potential-to-emit (PTE) values stated in the Title V air operation permit, Permit No. 0690046-010-AV. The permitted PTE for Pb emissions are 0.566 TPY and the permitted PTE for Hg emissions are 0.0708 TPY. The Department makes the corrections to the "projected actual emissions and "increase in emissions" values for Pb and Hg emissions.

The table is further corrected to read as follows:

"**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 in Emissions, TPY	PSD SER, TPY	PSD SER exceeded?
PM	6.53	31.53	24.9	25	No
PM_{10}	6.53	21.43	14.9	15	No
Pb	0.0220	~~0.612~~0.566 [1]	~~0.59~~0.544 [1]	0.60	No
Hg [1]	0.00989 [1]	~~0.09989~~0.0708 [1]	~~0.090~~0.06091 [1]	0.10	No
NOx	~~393~~495.7	~~432.9~~535.6	39.9	40	No
CO	28.2	128.1	99.9	100	No
VOC	1.68	41.58	39.9	40	No
SO_2	6.05	45.95	39.9	40	No
MWC acid gases [SO_2 + HCl]	31.1	71.0	39.9	40	No
MWC organics [dioxins/furans]	NA	NA	NA	3.5×10^{-6}	-

[1] Calculated by the Department.

"NA" means not available."

2. Several of the TPY values for affected PSD-air pollutants needing to be limited by permit are further addressed here. Note, that not all of the listed PSD-air pollutants in the table need to be limited by this permit.

The PSD-(Air) pollutants shown in the table from the draft permit are addressed individually here.

PM/PM_{10}

The current permitted potential-to-emit (PTE) value for PM emissions is 35.44 TPY as derived from the Title V air operation permit, Permit No. 0690046-010-AV. The projected actual emissions (31.53 TPY) were calculated to be less than the current PTE (35.44 TPY). To avoid triggering PSD, i.e., an increase greater than the PSD SER for PM, PM emissions need to be limited to the projected actual emissions TPY quantity of 31.53 TPY.

A PTE value for PM_{10} emissions was not available. Emissions of PM_{10} are in effect indirectly limited by the PM limit, so there is no need to limit PM_{10} emissions at this time.

Pb

The current permitted PTE value for Pb emissions is 0.566 TPY as derived from the Title V air operation permit, Permit No. 0690046-010-AV. The 0.566 TPY value was based on the federal short-term 40 CFR 60 Subpart Cb standard of 400 micrograms per dry standard cubic meter (µg/dscm). The projected actual emissions (0.612 TPY) had been calculated to be greater than the current PTE (0.566 TPY). The current permitted PTE value for Pb emissions at the 400 µg/dscm standard (corresponds to 0.566 TPY) therefore already self restricts Pb emissions to a level below the projected actual emissions, so there is no need to limit TPY by this permit for Pb emissions.

Hg

The current permitted PTE value for Hg emissions is 0.0708 TPY as derived from the Title V air operation permit, Permit No. 0690046-010-AV. The 0.0708 TPY value was based on the federal short-term 40 CFR 60 Subpart Cb standard of 50 µg/dscm. The projected actual emissions (0.09989 TPY) had been calculated to be greater than the current PTE (0.0708 TPY). The current permitted PTE value for Hg emissions at the 50 µg/dscm standard (corresponds to 0.0708 TPY) therefore already reasonably self restricts Hg emissions to a level below the projected actual emissions, so there is no need to limit TPY by this permit for Hg emissions.

NOx

The current permitted PTE value for NOx emissions is 555.72 TPY as derived from the Title V air operation permit, Permit No. 0690046-010-AV. The projected actual emissions (535.6 TPY) were calculated to be less than the current PTE (555.72 TPY). To avoid triggering PSD, i.e., an increase greater than the PSD SER for NOx, NOx emissions need to be limited to the projected actual emissions TPY quantity of 535.6 TPY.

CO

The current permitted PTE value for CO emissions is 165 TPY as derived from the Title V air operation permit, Permit No. 0690046-010-AV. The projected actual emissions (128.1 TPY) were calculated to be less than the current PTE (165 TPY). To avoid triggering PSD, i.e., an increase greater than the PSD SER for CO, CO emissions need to be limited to the projected actual emissions TPY quantity of 128.1 TPY.

VOC

A PTE value for VOC emissions was not available. The projected actual emissions were calculated to be 41.58 TPY. With actual VOC emissions being less than 2 TPY, it is reasonable expected that VOC emissions will not exceed the PSD SER for VOC, so there is no need to limit VOC emissions. Also, VOC is a product of incomplete combustion; therefore limiting CO emissions indirectly limits VOC emissions.

SO_2

The current permitted PTE value for SO_2 emissions is 109.38 TPY as derived from the Title V air operation permit, Permit No. 0690046-010-AV. The projected actual emissions (45.95 TPY) were calculated to be less than the current PTE (109.38 TPY). To avoid triggering PSD, i.e., an increase greater than the PSD SER for SO_2, SO_2 emissions need to be limited to the projected actual emissions TPY quantity of 45.95 TPY.

MWC acid gases [SO_2 + HCl]

The TPY SO_2 emission limit established by this permit and the federal short-term 40 CFR 60 Subpart Cb standard of 29 parts per million by volume (ppmv) for HCl emissions effectively provide reasonable assurances that the PSD SER for MWC acid gases [SO_2 + HCl] will not be exceeded, so there is no need to limit MWC acid gases [SO_2 + HCl] emissions.

MWC organics [dioxins/furans]

A PTE value for MWC organics [dioxins/furans] emissions was not available. Emissions of MWC organics [dioxins/furans] are in effect indirectly limited by the CO limit, so there is no need to limit MWC organics [dioxins/furans] emissions at this time.

Specific Condition III.A.4. is inserted to clearly indicate the PSD-air pollutant values that need to be indeed limited in this permit (project) to read as follows:

"4. Emissions from MWC Unit Nos. 1 & 2 under this project (Permit No. 0690046-014-AC/PSD-FL-113I) shall not exceed the following:

PSD-(Air) Pollutant	**TPY**
PM	31.53
NOx	535.6
CO	128.1
SO_2	45.95

[Applicant's Request under Rule 62-210.200(252)(d), *Definitions - Projected Actual Emissions*, F.A.C.; Rule 62-212.300(1)(e), *PSD Avoidance*, F.A.C.; Application No. 0690046-014-AC/PSD-FL-113I; Rule 62-212.400(12), *Source Obligation*, F.A.C.; and, Rule 62-210.200, *Definitions - PTE*, F.A.C.]

{Permitting note: Under this permit in this specific condition, PTEs for these PSD-(air) pollutants were lowered to avoid PSD at the applicant's request.}"

3. PSD-air pollutant values were limited in this permit (project). Specific Condition III.A.3. is corrected to read as follows:

"3. The short term unit-specific emission standards & limitations for E.U. ID Nos. 001 & 002, MWC Unit Nos. 1 & 2 were not changed under this project. [Application No. 0690046-014-AC/PSD-FL-113I; Rule 62-210.200, *Definitions - PTE*, F.A.C.; and, Rule 62-4.070(1)&(3), *Reasonable Assurance*, F.A.C.]"

CONCLUSION

The final action of the Department is to issue the permit with the administrative corrections and/or clarifications as noted above.