Lee County Department of Solid Waste Management
Lee County Resource Recovery Facility

Final Permit No. 0710119-011-AV
Title V Air Operation Permit Revision

APPLICANT

The applicant for this project is the Lee County Department of Solid Waste Management. The applicant's responsible official and mailing address are: Mr. Lindsay J. Sampson, Director, Lee County Solid Waste Division, Lee County Resource Recovery Facility, 10500 Buckingham Road, Suite 200, Fort Myers, Florida 33905.

FACILITY DESCRIPTION

The Lee County Resource Recovery Facility is located in Lee County at 10500 Buckingham Road, Fort Myers, Florida. The facility is owned by Lee County and is currently operated by Covanta Lee, Inc. This existing facility consists of: three municipal solid waste combustors (Unit Nos. 1, 2 and 3) with auxiliary burners; ash storage and processing facilities; a metals recovery system; cooling towers; and ancillary support equipment. The total capacity of the Lee County Resource Recovery Facility is 1,980 tons/day of municipal solid waste fuel with a nominal higher heating value of 5,000 Btu/lb. The gross nominal electric generating capacity of the facility is 60 megawatts. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The applicant requests a revision of conditions in original PSD Permit No. 0710119-005-AC/PSD-FL-151D to replace the requirement to continuously monitor ammonia emissions from municipal waste combustor Unit No. 3 (EU-006) with an annual stack test requirement. As part of the project the, Title V air operation permit will be concurrently revised as project No. 0710119-011-AV to incorporate the changes made in the air construction permit conditions.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

The application for a Title V Air Operation Permit Revision was received on July 23, 2012.
Draft/Proposed Title V Air Operation Permit Revision issued on September 12, 2012.

PRIMARY REGULATORY REQUIREMENTS

HAPS: This facility is a major source of hazardous air pollutants (HAP) based on the Title V air operation permit renewal application.

NESHAP: This facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 Code of Federal Regulations (CFR) 63.

Title IV: This facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: This facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: This facility is a major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

NSPS: This facility operates units subject to the New Source Performance Standards (NSPS) of 40 CFR 60.

CAIR: This facility does not operate units subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

Siting: This facility operates units subject to the power plant siting provisions of Chapter 62-17, F.A.C.

CAM: Emissions units at this facility are not subject to Compliance Assurance Monitoring (CAM) for one or more of the following reasons: unit does not trigger the potential pre-air pollution control device major source

emission thresholds; unit demonstrates continuous compliance with a continuous emission monitoring system (CEMS); units are not equipped with air pollution control device; units are equipped with a device that is considered to be inherent to the process/operation; or, the unit satisfies CAM by meeting the post-1990 federal monitoring requirements in Subparts Cb/Eb of 40 CFR 60 for the same or similar air pollutants.

PROJECT REVIEW

Specifically, the following changes were made to the Title V air operation permit; all other specific conditions were renumbered accordingly.

~~**B.32** Ammonia Slip. An ammonia CEMS shall be operated for the purpose of measuring ammonia slip from this emissions unit (with a range of 100 ppm), and used for informational purposes rather than continuous compliance (other than as allowed for in Specific Condition **B.40.**). For purposes of the RATA, this CEMS shall be compared to CTM-027. All continuous monitoring systems shall be installed, calibrated, maintained and operated as required by 40 CFR 60.13 and shall conform to all applicable Performance Specifications in 40 CFR 60, Appendix B. Quality assurance procedures shall conform to all applicable sections of 40 CFR 60, Appendix F. [Permit No. PSD-FL-151D/0710119-005-AC, Condition D.3.; and, Rule 62-4.070(1)&(3), F.A.C.]~~

~~**B.37.**~~ **B.36.** Compliance Testing Conditions. The Method 9 test shall be conducted during one run of the particulate matter emissions test. The particulate matter emissions test shall be conducted under conditions representative of normal operations and at least one test run shall be conducted during a normal (soot blowing) cycle. Simultaneous CEMS data for NOx shall be submitted with the ~~quarterly~~ annual ammonia stack test data and results (Method CTM-027 or equivalent for ammonia). [Rules 62-4.070(1)&(3) and 62-297.310, F.A.C.; and, Permit No. PSD-FL-151~~D~~G/0710119-0~~05~~10-AC]

~~**B.40.**~~ **B.39.** Ammonia Slip Testing. The ammonia slip rate shall be established at 30 ppmvd @ 7% O_2 based upon ~~quarterly~~ annual stack test results. ~~However, if the ammonia CEMS demonstrates that the quarterly ammonia slip average for the calendar quarter preceding the scheduled quarterly test is 15 ppmvd @ 7% O_2 or less, then CEMS data shall substitute for the required quarterly stack test.~~ [Permit No. ~~PSD-FL-151D/~~0710119-0~~05~~10-AC/PSD-FL-151G~~, Condition B.10.(5).~~]

CONCLUSION

This project revises Title V air operation permit No. 0710119-007-AV, which was effective on January 26, 2012. This Title V air operation permit revision is issued under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210, 62-213 and 214, F.A.C.