FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
160 West Government Street, Suite 308
Pensacola, Florida 32502-5794

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Secretary

February 20, 2014

Sent by Electronic Mail – Received Receipt Requested
jim.oskowis@talgov.com

PERMITTEE

City of Tallahassee
300 South Adams Street
Tallahassee, Florida 32301

Authorized Representative:
Jim Oskowis, General Manager

Air Permit No. 0730113-004-AC
Permit Expires: February 20, 2016

Thomas P. Smith Water Reclamation Facility
Minor Source Air Construction Permit
Flare No. 4 Construction

This is the final air construction permit, which authorizes construction of Flare No. 4 to incinerate excess digester gas from anaerobic digester #4. The proposed work will be conducted at the Thomas P. Smith Water Reclamation Facility, which is a Sewage Treatment Facility (Standard Industrial Classification No. 4952). The facility is located in Leon County at 4505-B Springhill Road in Tallahassee, Florida. The UTM coordinates are Zone 16, 757.096 km East, and 3365.132 km North. As noted in the Final Determination provided with this final permit, no changes were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information
Section 2. Administrative Requirements
Section 3. Emissions Unit Specific Conditions
Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Pensacola, Florida.

/S/
J. Charles Harp
Program Administrator
Waste Management/Air Resources

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on February 20, 2014 to the persons listed below.

Jim Oskowis, General Manager, City of Tallahassee, jim.oskowis@talgov.com
Russell Wider, City of Tallahassee, Russell.wider@talgov.com
Bill Evans, DEP Northwest District Water Facilities Program, bill.evans@dep.state.fl.us
Tracy A. White, DEP Northwest District Branch Office, Tallahassee, tracy.a.white@dep.state.fl.us

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

/S/_____ 02/20/2014
Clerk Date

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility contains a thermal sewage sludge drying system, featuring a direct-heat concurrent, triple-pass rotary drum 20 MMBtu/hr heat input Andritz sewage sludge dryer, conveying equipment, two dried product storage silos, a venturi scrubber, a pellet cooler. This facility also includes four digester gas boilers, two flares, and an emergency generator.

Facility ID No. 0730113	
ID No.	**Emission Unit Description**
001	Rotary Drum Thermal Sewage Sludge Dryer (Andritz DDS50, 20 MMBtu/hr)
005	Flares No. 1 & No. 2 (shrouded, 1-foot diameter, 15 foot stack, 11 MMBtu/hr, 15,907 scf/hr each)
009	CI RICE Engine (Generac 95A01180-S, 3.0 liter, 52 hp)
007	Boilers 101 & 102, both Cleaver Brooks CBLE-150-HW, 7.2 MMBtu/hr
002	Digester Gas Boilers No. 4 - 1.34 MMBtu/hr & No. 3 - 1.125 MMBtu/hr

Proposed Project

This permit is for the construction of Flare No. 4 to serve as a waste gas burner system for Digester #4. This project will add Flare No. 4 as an emissions point to Emissions Unit 005. The original application documents showed a shrouded flare but applicant decided the flare will be an open flare as verified in an e-mail dated December 13, 2014, from Russell Wider of the City of Tallahassee.

Facility ID No. 0730113	
ID No.	**Emission Unit Description**
005	Flares No. 1 & No. 2 (shrouded, 1-foot diameter, 15 foot stack, 11 MMBtu/hr, 15,907 scf/hr each) and Flare No. 4 (open flame, 1 foot diameter, 15 feet stack, 1.29 MMBtu/hr , 1875 scf/hr)

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northwest District Waste Management/Air Resources Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 W. Government Street, Suite 308, Pensacola, Florida 32502-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office at the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or nwdair@dep.state.fl.us.

3. Appendices: The Appendices in Section 4 are attached as part of this permit:

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. Asbestos: This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

7. Modifications: The permittee shall notify the Permitting and Compliance Authority upon commencement of construction. Notification may be submitted by electronic mail to nwdair@dep.state.fl.us and copied to the permitting authority at epost_nwdwasteair@dep.state.fl.us . No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

A. Emissions Unit 005, Flares

This section of the permit addresses the following emissions unit

ID No.	Emissions Unit Description
005	Flares No. 1 & No. 2 (shrouded, 1-foot diameter, 15 foot stack, 11 MMBtu/hr, 15,907 scf/hr each) and Flare No. 4 (open flame, 1 foot diameter, 15 feet stack, 1.29 MMBtu/hr, 1875 scf/hr)

This emissions unit consists of two shrouded flares that replaced two existing flares. Flares No. 1 and No. 2 are used for combustion of digester gas during emergency situations when the digester gas cannot be combusted in the rotary drum thermal sewage sludge dryer (EU 001) or Boiler-101 and Boiler-102 (EU 007), and for operational flexibility. The estimated maximum combustion capacity is 139.35 million cubic feet per year for each flare.

This permit will add open flame Flare No. 4. The flare will be used as a waste gas burner for Digester #4 for combustion of digester gas during emergency situations when the digester gas cannot be combusted in Boiler No. 4, and for operational flexibility. The original application documents showed a shrouded flare but applicant later decided the flare will be an open flare as verified in an e-mail dated December 13, 2014 from Russell Wider of the City of Tallahassee.

Digesters #3 and #4 were in existence at the TP Smith facility prior to construction permits 0730113-001-AC and 0730113-002-AC. At that time, the facility intended to tie both waste gas burner systems into the newly constructed waste gas burner system that was covered in construction permit 0730113-002-AC. Recently, it was discovered that extensive and expensive modifications to Digester #4 would be required in order to connect it to the new WGB system. This digester would require a re-ballasting of the cover at a cost of $320,000. Applicant decided to dedicate a separate WGB system with a flare to digester No. 4.

These flares are not regulated by NSPS requirements because they are not used as control devices to meet standards in subparts of 40 CFR 60 or 61. [40 CFR 60.18]

The following specific conditions apply to the emissions unit(s) listed above:

1. New Equipment: Except for the change noted below, the new equipment authorized by this permit shall be subject to the same requirements, such as, but not limited to; emissions standards, recordkeeping, compliance testing and fuels limitations previously established for this emissions unit in all other legally binding air construction and operating permits. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

EQUIPMENT

2. Flare No. 4. Permittee is authorized to install Flare No. 4 and its associated equipment. [Application No. 0730113-004-AC]

PERFORMANCE RESTRICTIONS

3. Authorized Fuel. The flare shall be fired with digester waste gas, and may be supplemented by natural gas. [Rule 62-210.200(PTE), F.A.C., and Application No. 0730113-004-AC]
4. Restricted Operation. The hours of operation of Flare No.4 are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]