TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Brevard County Board of County Commissioners
Brevard County Solid Waste Department
2725 Judge Fran Jamieson Way, Building A, Suite 118
Viera, FL 32940

Brevard County Central Disposal Facility
Facility ID No. 0090069

PROJECT

Project No. 0090069-011-AV
Application for Title V Air Operation Permit
Project Name: Title V Air Operation Permit Renewal

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

May 14, 2012

Prepared by Jeffrey Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

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.

Glossary of Common Terms

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

I. <u>Project Description:</u>

A. Applicant:

Mr. Euripedes Rodriguez, Director
Brevard County Solid Waste Management Department
2725 Judge Fran Jamieson Way, Building A, Suite 118
Viera, FL 32940

B. Professional Engineer:

Mr. Mehran S. Beladi, P.E.
Neel-Schaffer, Inc.
2301 Lucien Way, Suite 300
Maitland, Florida 32751

C. Project Location:

Central Disposal Facility, Brevard County Florida
2250 Adamson Rd.
Cocoa, Florida 32926

D. Project Summary:

The project is the renewal of the existing Title V Air Operation Permit for the municipal solid waste facility.

E. Application Information:

Applications Received on: November 21, 2011
Additional Information Requested on: January 19, 2012
Additional Information Received and complete on: February 20, 2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	Y	Facility is a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Facility is a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Facility is a source of VOC and odors.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	Facility is subject to 40 CFR 60, Subpart A- General Provisions and 40 CFR 60, Subpart WWW- Standards of Performance for Municipal Solid Waste Landfills.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	Y	40 CFR 61, Subpart M.
Rule 62-204.800, F.A.C. National Emission	Y	Facility is subject to 40 CFR 63,

Subject to:	Y/N	Comments
Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)		Subpart A- General Provisions and 40 CFR 63, Subpart AAAA- National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Facilities. 7 RICE engines subject to 40 CFR 63, Subpart ZZZZ
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is a Title V major source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	Annual Compliance Testing for only one of the six LFG engines (6 year cycle) to demonstrate compliance with the emission standards for VE, NOX, CO, SO2, and HCl. All six engines shall be tested for VOC emissions once every five years prior to obtaining a renewed operating permit. The flares must be tested annual using EPA Method 22.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC	Facility	**39.89***	**35.94**
CO	Facility	**619.58***	**451.8**
NO_2	Facility	**39.18***	**12.94**
SO_2	Facility	**63.84***	**69.3**
PM	Facility	**74.81***	**31.02**
Total HAP	Facility	**9.49***	**24.0**

*projected potential to emit for year 2017

V. Federal NSPS and/or NESHAP Provisions

A. 40 CFR 60, Subpart A – General Provisions;
B. 40 CFR 60 Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills;
C. 40 CFR 61 Subpart M - National Emission Standards for Asbestos;
D. 40 CFR 63, Subpart A – General Provisions;
E. 40 CFR 63 Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Facilities; and
F. 40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state 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. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to operate the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).