TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

I. GENERAL INFORMATION

A. APPLICANT

Greenland Biomass, LLC
219 N. Newnan Street
Jacksonville, FL 32202

Draft Permit No: 0310592-001-AC
County: Duval

B. PROJECT

On May 6, 2014 the applicant, Greenland Biomass, LLC, applied to the Department for a construction permit for an air curtain incinerator for the destruction of land clearing debris. The air curtain incinerator is an Air Burners Model S-220 above ground, refractory lined, self-contained unit. The fan is powered by a four cylinder Turbo Diesel engine.

The facility will be located at 11651 Davis Creek Road East, Jacksonville, FL 32256.

II. RULE APPLICABILITY

The facility will be located in an area designated as unclassifiable for the air pollutants sulfur dioxide, lead, and particulate matter less than or equal to ten (10) micrometers, in an air quality maintenance area for ozone, and in the area of influence of an air quality maintenance area for particulate matter pursuant to Chapter 62-204, Florida Administrative Code (FAC), and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

This emission unit is subject to 40 CFR 60, Subpart CCCC-Standards of Performance for Commercial and Industrial Solid Waste Incineration Units

III. TECHNICAL EVALUATION

EU No.	EU Description
001	Air Curtain Incinerator

This EU shall be allowed to operate a maximum of 1,056 hours per year.

The maximum process rate shall be limited to 6 tons per hour and 6,336 tons per year of land clearing debris.

Visible Emissions (VE) shall be limited as follows:

(a). Outside of Startup: Maintain opacity to less than or equal to 10 percent opacity (as determined by the average of three 1-hour blocks consisting of ten 6-minute average opacity values), except as described in paragraph (b) of this section.

(b). During Startup: Maintain opacity to less than or equal to 35 percent opacity (as determined by the average of three 1-hour blocks consisting of ten 6-minute average opacity values) during the startup period that is within the first 30 minutes of operation.

The only materials that shall be burned in the air curtain incinerator are vegetative material and untreated wood, excluding sawdust. The air curtain incinerator shall not be used to burn any biological waste, hazardous waste, asbestos-containing materials, mercury-containing devices, pharmaceuticals, tires, rubber material, residual oil, used oil, asphalt, roofing material, tar, treated wood, plastics, garbage, trash or other material prohibited to be open burned as set forth in subsection 62-256.300(2), F.A.C. Only kerosene, diesel fuel, drip-torch fuel (as used to ignite prescribed fires), untreated wood, virgin oil, natural gas, or liquefied petroleum gas shall be used to start the fire in the air curtain incinerator. The use of used oil, chemicals, gasoline, or tires to start the fire is prohibited.

In no case shall the air curtain incinerator be started before sunrise. All charging shall end no later than one (1) hour after sunset. After charging ceases, air flow shall be maintained until all material within the air curtain incinerator has been reduced to coals, and flames are no longer visible.

The air curtain incinerator shall be attended at all times while materials are being burned or flames are visible within the incinerator.

The air curtain incinerator shall be located at least fifty (50) feet from any wildlands, brush, combustible structure, or paved public roadway.

The material shall not be loaded into the air curtain incinerator such that it protrudes above the air curtain.

Ash shall not be allowed to build up in the pit of the air curtain incinerator to higher than one third (1/3) the pit depth or to the point where the ash begins to impede combustion, whichever occurs first.

An operation and maintenance guide shall be available to the operators of the air curtain incinerator at all times, and the owner shall provide training to all operators before they work at the incinerator. This guide shall be made available to the Department or for an inspector's onsite review upon request.

IV. CONCLUSION

Based upon information provided by the applicant, the Department has reasonable assurance that the air curtain incinerator, as described in this application and subject to the conditions proposed herein,

will not cause, or contribute to a violation of any ambient air quality standard or other technical provision of Chapters 62-296 and 62-297, FAC, JEPB Rules 2.1101 and 2.1201.