Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

PERMITTEE

Lee County Department of Solid Waste Management
10500 Buckingham Road, Suite 200
Fort Myers, Florida 33905

Authorized Representative:
Mr. Lindsay J. Sampson, Director

Permit No. 0710119-010-AC/PSD-FL-151G
Air Construction Permit Modification
Lee County Resource Recovery Facility
Remove Ammonia CEMS for Unit 3
Lee County, Florida

PROJECT

This is the final air construction permit which modifies Permit No. 0710119-005-AC/PSD-FL-151D to remove the requirements to continuously monitor ammonia slip from municipal waste combustor Unit No. 3. This facility is an existing municipal waste combustor plant categorized under Standard Industrial Classification No. 4953. This existing plant is located in Lee County at 10500 Buckingham Road, Fort Myers. UTM Coordinates are: Zone 17, 424.21 km East and 2945.70 km North. Latitude is 26° 37' 54" North and Longitude is 81° 45' 41" West.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Modification).

STATEMENT OF BASIS

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.). 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. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

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 Tallahassee, Florida
(Electronic Signature)

Office of Permitting and Compliance
Division of Air Resource Management
Department of Environmental Protection
Tallahassee, Florida

Jeffery F. Koerner
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JFK/yha

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 Revision), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Lindsay J. Sampson, Director, Lee County DSWM: sampsolj@leegov.com
Mr. Jason M. Gorrie, P.E., Covanta: jgorrie@covantaenergy.com
Mr. A. J. Satyal, DEP SD: ajaya.satyal@dep.state.fl.us
Ms. Cindy Mulkey, DEP Siting Office: cindy.mulkey@dep.state.fl.us
Ms. Heather Ceron, U.S. EPA Region 4: ceron.heather@epa.gov
Ms. Katy R. Forney, U.S. EPA Region 4: forney.kathleen@epa.gov
Ms. Ana Oquendo-Vazquez, U.S. EPA Region 4: oquendo.ana@epa.gov
Ms. Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us (for reading file)

Clerk Stamp

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

Lynn Scearce
2012.11.02 14:09:42 -04'00'

FACILITY DESCRIPTION

This existing facility consists of: three municipal solid waste combustors (Unit Nos. 1, 2 and 3) with auxiliary burners; lime storage and processing facilities; 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. The facility is owned by Lee County and is currently operated by Covanta Lee, Inc. Also located at the facility are miscellaneous unregulated/ insignificant emissions units and/or activities.

FACILITY REGULATORY CLASSIFICATION

- This facility is a major source of hazardous air pollutants (HAP).
- This facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.

PROPOSED PROJECT

This permit modifies Permit No. 0710119-005-AC/PSD-FL-151D to remove the requirement to continuously monitor ammonia emissions from municipal waste combustor Unit No. 3 and replace it with annual stack testing. As part of the project, the Title V air operation permit is being concurrently revised by project No. 0710119-011-AV concurrently to incorporate this change.

The following permit conditions and emissions unit description are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text.

Permit Being Modified: 0710119-005-AC/PSD-FL-151D

Affected Emissions Unit: Municipal Waste Combustor Unit 3 (EU-006)

Section III. Specific Conditions

COMPLIANCE AND PERFORMANCE TESTING

B.10.(5) ~~The ammonia slip rate shall be initially established for a 12-month period at 50 ppmvd @ 7% O_2 and based upon quarterly stack test results (Note: the applicant has represented that this will not cause a work-place safety issue, an ash management issue or an odor issue). Thereafter, t~~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 tack test~~.

B.11. Test Procedures: Compliance tests shall meet all applicable requirements (i.e., testing frequency, minimum compliance duration, etc.) of Chapter 62-297, F.A.C. The Method 9 test shall be conducted during one run of the particulate matter test. The particulate matter 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. Initial performance tests for SO_2 and NO_X shall be conducted using CEMS in accordance with the methods and requirements of 40 CFR 60.58b(e)(4), (h)(3) and (i)(3) respectively. Simultaneous CEMS data for NO_X shall be submitted with the ~~quarterly~~ annual ammonia stack test data and results (Method CTM-027 or equivalent for ammonia). All test reports shall include the information required by 40 CFR 60.59b(f). [Rules 62-4.070(3), 62-297.310 and 62-204.800(8), F.A.C.; 40 CFR 60.38b, 40 CFR 60.58b and 40 CFR 60.59b]

MONITORING OF OPERATIONS

B.13. Continuous Monitoring: Compliance with the emission limits for carbon monoxide (CO), nitrogen oxides (NO_X) and sulfur dioxide (SO_2) in specific condition **B.8.** of this permit shall be demonstrated by continuous emission monitoring systems (CEMS) operated in accordance with the requirements of 40 CFR 60.58b. Oxygen (O_2) and opacity shall be monitored by continuous monitoring systems. Monitors for sulfur dioxide and oxygen shall be located both upstream of the dry scrubber and downstream of the baghouse in order to calculate percentage removal efficiency. ~~A CEMS shall be installed for the purpose of measuring ammonia slip from this emissions unit (with a range of 100ppm), and used for informational purposes rather than continuous compliance (other than as allowed for in specific condition B.10). 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. Initial performance evaluations shall be completed within 180 days after initial startup of the unit. Data on continuous monitor equipment specifications, manufacturer, type, calibration and maintenance needs, and proposed locations shall be provided to the DEP-SD for review at least 90 days prior to installation. [Rules 62-4.070(3) and 62-204.800(8), F.A.C.; 40 CFR 60.38 and 40 CFR 60.58b]