Attachment 1: Technical Evaluation in Support of the Determination

Two Boilers and Six Water Heaters at the Facility:

2 Superior–400 HP Boilers rated at approximately 16,392 CF/hr.
2 Teledyne water heaters@ 5 MMBTU/hr. each
2 Lochinvar water heaters@ 0.2 MMBTU/hr. each
2 Camus Dynaforce water heaters@0.6 MMBTU/hr. each

The two boilers are subject to 40 CFR 60, Subpart Dc; however, the boilers are subject only to recordkeeping requirements [§60.48c(g)(2), that is, record and maintain records of the amount of fuel (natural gas) combusted during each calendar month]. Any subpart of 40 CFR Part 60, 61, or 63 that imposes nothing more than recordkeeping or reporting requirements for an emission unit is not considered to be a unit-specific requirement.

The boilers and hot water heaters are entitled to the categorical and conditional permit exemption criteria contained in Rule 62-210.300(3)(a)34., F.A.C., if each boiler and each hot water heater burns no more than 150 MMCF per year of natural gas and the boilers and hot water heaters collectively burn no more than 375 MMCF per year of natural gas. The natural gas usage collectively each year has been between 52.8 and 56.7 MMCF during the last 5 calendar years (2009-2013), which is less than 20 percent of the 375 MMCF exemption limit (20 percent of 375 MMCF is 75 MMCF).

Four Emergency Generators at the Facility:

2 - 1,250 kW generators
1 - 200 kW generator
1 - 130 kW generator

The emergency generators are entitled to the categorical and conditional permit exemption criteria contained in Rule 62-210.300(3)(a)35., F.A.C. if the collective diesel fuel usage does not exceed 64,000 gallons of diesel fuel per year. The highest collective fuel usage during the last 5 calendar years (2009-2013) was 7,719 gallons of diesel fuel during calendar year 2009, which is well below the 64,000 gallons of diesel fuel exemption limit.