

(DRAFT)

AIR POLLUTION CONSTRUCTION PERMIT

PALM BEACH COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH AND ENGINEERING
P.O. Box 29 (901 Evernia Street)
West Palm Beach, Florida 33402-0029
Telephone: (561) 355-3136

ISSUED TO:

Permittee:

Boca Raton Resort and Club
501 East Camino Real
Boca Raton, Florida 33431-0825

ARMS No.:	099-0015
Permit No.:	099-0015-002-AC
Issued:	DRAFT
Expires:	DRAFT

Authorized Representative:

Mr. William M. Pierce, Vice President

Permit Engineer:

Darrel J. Graziani, P.E.

LOCATED AT:

Boca Raton Resort and Club
501 East Camino Real Boulevard
Boca Raton, FL 33432-6127

UTM Coordinates: Zone 17; 592.00 km E ; 2913.7 km N
Latitude: 26° 25' 30" North / Longitude: 80° 07' 47" West

STATEMENT OF BASIS:

The Palm Beach County Health Department (Health Department) issues this permit under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4 through 62-297 the Florida Administrative Code (F.A.C.). The Florida Department of Environmental Protection (DEP) has permitting jurisdiction under Chapter 403.087, F.S. However, in accordance with Section 403.182, F.S., the DEP recognizes the Health Department as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement that delegates to the Health Department the authority to issue or deny permits for this type of air pollution source located in Palm Beach County. The above named permittee is authorized to construct or modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Health Department.

ISSUED BY:

Executed in West Palm Beach, Florida.

PALM BEACH COUNTY HEALTH DEPARTMENT

Frank J. Gargiulo, P.E., R.S., Director
Division of Environmental Health and Engineering

SECTION I. SUMMARY INFORMATION

PERMIT HISTORY

August 19, 1998: Title V Operating Permit issued (Final).
 October 31, 2000: After-the-Fact Air Construction Permit Application Received & Deemed Complete.
 November 8, 2000: Health Department mails "Notice of Intent."

PERMIT CONTENT

Section I: Summary Information
 Section II: Facility-Wide Specific Conditions
 Section III: Emissions Unit Specific Conditions
 Section IV: Appendices
 Appendix A: General Conditions
 Appendix B: Citation Format/Abbreviations/Definitions
 Appendix C: Test Procedures
 Appendix D: BACT Determination

REGULATORY CLASSIFICATIONS

PROGRAM	PROGRAM DESCRIPTION	CLASSIFICATION
PSD	Prevention of Significant Deterioration Rule 62-212.400, F.A.C	Minor Source
NSR-NAA	New Source Review for Nonattainment Areas Rule 62-212.500, F.A.C.	Not Applicable
NSPS	New Source Performance Standards 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.	New Source
NESHAP	National Emission Standards for Hazardous Air Pollutants 40 CFR Part 63 Subpart M – National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities	New-Area Source Synthetic Minor
Title V Operating Permit	Federal Operating Permit Program Rule 62-213, F.A.C	Designated Source

EMISSIONS UNIT SUMMARY

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
01	Six (6) 1 mmBtu/hr Hot Water Generators. <i>[Note: The three (3) 12 mmBtu/hr Steam Generating Units were shutdown in May, 2000.]</i>
02	Surface Coating Operations (Insignificant)
03	N/A
04	Perchloroethylene Dry Cleaning Operation (To Be Replaced)
05	Incinerator (Shutdown – August, 1987)
06	Internal Combustion Engines (Natural Gas and Diesel Fired)
07	Two (2) 10.46 mmBtu/hr Steam Generating Units [Permit No. : 099-0015-002-AC]
08	Perchloroethylene Dry Cleaning Operation [Permit No. 099-0015-003-AC]

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

II.1 ADMINISTRATIVE

- II.1.1 Regulating Agencies: All applications, reports, tests, and notifications shall be submitted to the Air Pollution Control Section of the Palm Beach County Health Department (Health Department) at P.O. Box 29 (901 Evernia Street), West Palm Beach, Florida, 33402-0029, and phone number (561) 355-3136. In addition, *copies* shall be submitted to the Air Program, Southeast District Office, Florida Department of Environmental Protection (DEP) at P.O. Box 15425 (400 North Congress Avenue), West Palm Beach, Florida, 33416-5425. **[Specific Operating Agreement]**
- II.1.2 General Conditions: The permittee shall be aware of, and operate under, the attached General Conditions listed in *Appendix A* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. **[Rule 62-4.160, F.A.C.]**
- II.1.3 Citation Format/Abbreviations/Definitions: The format for citing applicable regulations, a list of abbreviations, and specific definitions are provided in *Appendix B* of this permit.
- II.1.4 Application for Operation Permit: The permittee shall apply for a revision to the Title V operating Permit (099-0015-001-AV) within 90 days of completion of construction and testing. The application shall include: a written request to revise the Title V Operating permit including certifications by the responsible official and professional engineer; all required test reports; and a summary of any changes or substitutions to the original equipment, processes, fuels, controls, etc. **[Rules 62-4.090 and 62-210.900, F.A.C.]**
- II.1.5 Permit Expiration: The permittee must maintain a valid (not expired) air construction permit during the entire application process for an operation permit. This construction permit may be extended at the written request of the permittee prior to its expiration. **[Rule 62-4.080(3), F.A.C.]**
- II.1.6 Applicable Regulations: This facility is subject to the following regulations: Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Specifically, the emissions units are subject to 62-204.800, 40 CFR Part 60 Subpart Dc, and 40 CFR Part 63 Subpart M. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300(1), F.A.C. and the SOA]**

II.2 EMISSION LIMITING AND PERFORMANCE STANDARDS

- II.2.1 General VOC Standards: The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents without applying known and existing vapor emission control devices or systems. **[Rule 62-296.320(1), F.A.C.]**
- II.2.2 Objectionable Odors: The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320(2), F.A.C.]**
- Note: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-210.200(200), F.A.C.]*
- II.2.3 General Visible Emissions Standard: Unless otherwise specified by permit, the permittee shall not cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from new, or existing emissions units, the opacity of which is equal to or greater than 20 percent. **[Rule 62-296.320(4)(b), F.A.C.]**

II.3 OPERATION AND MAINTENANCE REQUIREMENTS

- II.3.1 Circumvention: The permittee shall not circumvent air pollution control equipment/methods or allow the emission of air pollutants without the equipment/methods operating properly. **[Rule 62-210.650, F.A.C.]**
- II.3.2 Excess Emissions Requirements **[Rule 62-210.700, F.A.C.]**

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

- (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Health Department for longer duration. **[Rule 62-210.700(1), F.A.C.]**
- (b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction are prohibited. **[Rule 62-210.700(4), F.A.C.]**
- (c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Air Pollution Control Section of the Palm Beach County Health Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. **[Rule 62-210.700(6), F.A.C.]**

II.4 COMPLIANCE MONITORING REQUIREMENTS

- II.4.1 **Duration:** The permittee shall maintain all records and reports required by this permit for at least 5 years from the date the information is recorded. **[Rule 62-213.440(1)(b), F.A.C.]**
- II.4.2 **Test Procedures:** The permittee shall meet all applicable requirements of the Chapter 62-297, F.A.C. See *Appendix C* of this permit for a summary of these requirements. **[Rule 62-297.100, F.A.C.]**
- II.4.3 **Operational Rate During Testing:** Unless otherwise stated in the applicable emission limiting standard for a rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. **[Rule 62-297.310(2), F.A.C.]**
- II.4.4 **Stack Testing Facilities:** The owner or operator shall maintain permanent or have available temporary stack testing facilities in accordance with **Rule 62-297.310(6), F.A.C.** These requirements are summarized in *Appendix C* of this permit.
- II.4.5 **Test Notification:** The owner or operator shall notify the Health Department, in writing, at least 15 days prior to the date on which each formal compliance test is to begin, of the test date, the expected test time, the location of the test, the facility contact person responsible for coordinating the test, and the person or company conducting test. The 15 day notification requirement may be waived at the discretion of the Health Department. Likewise, if circumstances prevent testing during the test window specified for the emissions unit, the owner or operator may request an alternate test date before the expiration of this window. **[Rule 62-297.310(7)(a)9., F.A.C.]**
- II.4.6 **Compliance Tests:** The permittee shall conduct compliance tests that demonstrate compliance with the applicable emission limiting standards each federal fiscal year (October 1 – September 30) at intervals of no more than 12 months. **[Rule 62-297.310(7)(a), F.A.C.]**
- II.4.7 **Special Compliance Tests:** When the Health Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a DEP rule or permit is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Health Department. **[Rule 62-297.310(7)(b), F.A.C.]**

II.5 REPORTS REQUIRED

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

- II.5.1 Annual Operations Report: Before March 1st of each year, the permittee shall submit an Annual Operations Report [*DEP Form No. 62-210.900(5)*] to the Health Department which summarizes operations for the previous calendar year. [Rule 62-210.370(3), F.A.C.]
- II.5.2 Excess Emissions Report: If excess emissions occur, the permittee shall notify the Air Compliance Section of the Health Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Health Department may request a written summary report of the incident. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
- II.5.3 Emission Compliance Stack Test Reports: For each required emissions compliance test, a report indicating the results of the test shall be filed with the Health Department as soon as practical, but no later than 45 days after the last sampling run is completed. The report shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Health Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. and summarized in *Appendix C* of this permit. Additional report information may be specified for a given group of emissions units in this permit. [Rule 62-297.310(8), F.A.C.]

II.6.0 WASTE REQUIREMENTS

- II.6.1 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not preclude the permittee from securing any other types of required permits, licenses, or certifications.

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

This permit addresses the following emissions unit(s):

EMISSION UNIT No.	EMISSIONS UNIT DESCRIPTION
07	Two (2) fossil fuel steam generating units firing natural gas each with a maximum heat input rate of 10.46 mmBtu/hr.

III.1. EMISSION LIMITING STANDARDS

- III.1.1. Visible Emissions: 20 percent opacity except for one two-minute period per hour during which opacity shall not exceed 40 percent. [Rule 62-296.406(1), F.A.C.]
- III.1.2. Particulate Matter (PM): Best available control technology [Rule 62-296.406(2), F.A.C. & November 3, 2000 BACT Determination]
- III.1.3. Sulfur Dioxide (SO₂): Best available control technology [Rule 62-296.406(3), F.A.C. & November 3, 2000 BACT Determination]
- III.1.4. BACT Determination: The Permittee shall comply with the November 3, 2000 BACT Determination contained in Appendix D of this permit. [Rules 62-296.406(2) and 62-296.406(3), F.A.C.]

III.2. OPERATING RESTRICTIONS

- III.2.1. Permitted Capacity: The permittee shall not allow, cause, suffer or permit the operation of the units in excess of the following capacities without prior authorization from the Permitting Authority:
 - (a) Maximum Heat Input: 10.46 mmBtu/hr (3-hour average)[40 CFR 60.7(a)(4), Rules 62-4.160(2), 62-210.200(228), and 62-210.300, F.A.C., and November 3, 2000 BACT Determination]
- III.2.2. Methods of Operation: The permittee shall not allow, cause, suffer or permit any change in the method(s) of operation resulting in increased short-term or long-term emissions, without prior authorization from the Permitting Authority. The authorized methods of operation include the following:
 - (a) Steam Generator Operation: The permittee is authorized to operate the emissions units as fossil fuel steam generators.
 - (b) Fossil Fuels: The permittee is authorized to fire clean pipeline quality natural gas.[40 CFR 60.7(a)(4), Rule 62-4.160(2), 62-210.200(228), and 62-210.300, and 62-4.070(3), F.A.C. and November 3, 2000 BACT Determination]
- III.2.3. Hours of Operation: The permittee is authorized to operate the units continuously. [Rule 62-210.300(3)(c)1.d, F.A.C.]

III.3. COMPLIANCE MONITORING REQUIREMENTS

- III.3.1. Visible Emissions: The permittee shall have an initial formal compliance test conducted on each unit within 60 (sixty) days of the effective date of this permit and annual during each federal fiscal year (October 1 – September 30) at intervals of no more than 12 months to demonstrate compliance with the opacity limitation. [Rule 62-297.310(7)(a)4.a, F.A.C.] The test shall meet the following requirements:
 - (a) The permittee shall use DEP Method 9, *Visual Determination of the Opacity of Emissions from Stationary Sources*, 40 CFR 60, Appendix A. [Rule 62-297.401(9)(c), F.A.C.]
 - (b) The observation period of the EPA Method 9 shall be at least sixty (60) minutes in duration. [Rule 62-297.310(4)(a)2, F.A.C.]

II.4. RECORDKEEPING AND REPORTING – 40 CFR PART 60 SUBPARTS A AND DC

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

III.4.1. Operating Records: The permittee shall maintain the following daily records for at least five (5) years on the following:

- (a) Date.
- (b) Start-up, Shutdown, or Malfunction Occurrences and Duration.
- (c) Natural Gas Consumption (mmSCF/day).

[40 CFR 60.7(b) and 40 CFR 60.48c(g)]

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Draft Air Permit Nos. 099-0015-002-AC and 099-0015-003-AC

Boca Raton Resort and Club
501 East Camino Real
Boca Raton, Florida 33431-0825

Palm Beach County, Florida

Permitting Authority:

Palm Beach County Health Department
Division of Environmental Health and Engineering
Air Pollution Control Section
P.O. Box 29 (901 Evernia Street)
West Palm Beach, FL 33402-0029

Air Permit Engineer: Darrel J. Graziani, PE
Filename 099-0015-002-AC, TE & PD.doc

November 8, 2000

1.0 APPLICATION INFORMATION

1.1 Applicant Name and Address

Boca Raton Resort and Club
 501 East Camino Real
 Boca Raton, Florida 33431-0825
Authorized Representative: Mr. William M. Pierce, Vice President

1.2 Reviewing and Process Schedule

October 31, 2000: Application Received and Deemed Complete
 November 2, 2000: Intent to Issue Mailed

2.0 FACILITY INFORMATION

2.1 Facility Location

Boca Raton Resort and Club
 501 East Camino Real Boulevard
 Boca Raton, FL 33432-6127

UTM Coordinates: Zone 17; 592.00 km E ; 2913.7 km N
 Latitude: 26° 25' 30" North / Longitude: 80° 07' 47" West

The facility is located more than 10 kilometers (6.2 miles) from the nearest PSD Class I area, Everglades National Park.

2.2 Standard Industrial Classification Code (SIC #2951)

Major Group Number	70	Hotels, Rooming Houses, Camps and Other Lodging Places
Industry Group Number	701	Hotels and Motels
Industry Number	7011	Hotels and Motels

2.3 Emissions Units: The emissions unit inventory for the source includes the following:

EMISSION UNIT NO.	DESCRIPTION
01	Three (3) 12 mmBtu/hr Steam Generating Units (Shutdown – 5/1/2000) and six (6) 1 mmBtu/hr Hot Water Generators.
02	Surface Coating Operations (Insignificant)
03	N/A
04	Perchloroethylene Dry Cleaning Operation (To Be Replaced)
05	Incinerator (Shutdown – 8/1987)
06	Internal Combustion Engines (Natural Gas and Diesel Fired)
07	Two (2) 10.46 mmBtu/hr Steam Generating Units (New – 5/2000)
08	Perchloroethylene Dry Cleaning Operation (New – 12/2000)

2.4 Source Classifications

Preconstruction Review Program: The facility is a Minor Source under the preconstruction review programs. Its activities are not included on Table 62-212.400-1, F.A.C., Major Facilities Categories. Major source thresholds include 5 TPY for lead and 250 TPY for all PSD pollutants.

Hazardous Air Pollutant Program: The facility is classified as a minor source with potential emissions less than 10 tons per year of any listed hazardous air pollutant or 25 tons per year of any combination of

any listed hazardous air pollutants. The facility includes an area source subject to a MACT standard (Perchloroethylene Dry Cleaning Facilities).

Title V Operating Permit Program: The facility is a designated Title V source under the Florida Administrative Code. The facility includes an emissions unit subject to a Maximum Achievable Control Technology (MACT) area source standard (Perchloroethylene Dry Cleaning Facilities) and other regulated emissions units.

2.5 Area Designations

The proposed project is located within a PSD Class II area. The area is designated as attainment for the pollutant's ozone, carbon monoxide, sulfur dioxide, and nitrogen dioxide; and unclassifiable for the pollutants lead and PM₁₀ (Particulate Matter less than 10 micrometers in diameter). For the pollutant ozone, the area is further designated as a maintenance area.

3.0 PROJECT DESCRIPTION

3.1 Background:

In August 1998, the Boca Raton Resort and Club received a final Title V Operating Permit for their operations. Although the facility does not emit criteria pollutants nor hazardous air pollutants in major quantities, it does include a dry cleaning facility subject to a National Emissions Standards for Hazardous Air Pollutants (NESHAP).

Facilities that are subject to a NESHAP requiring more than recordkeeping are designated as Title V sources of air pollution. The facility is not entitled to a General Title V Permit because the source operates other regulated activities at the site. Consequently, the facility was required to obtain a full Title V air pollution operation permit.

For the current project, both activities are considered new construction and require state air construction permits in accordance with Rules 62-4, 62-210, and 62-212, F.A.C.

3.2 Project No. 099-0015-002-AC

The project involves the after-the-fact permitting of two (2) 10.46 million Btu per hour (mmBtu/hr) natural gas fired steam generating units. The new units were installed in May of 2000 and replaced three (3) 12 mmBtu/hr steam generating units. The project was subject to an enforcement action by the Health Department including an agreement to submit the after-the-fact permit application and payment of a cash penalty.

The new units are subject to the permitting requirements of Rules 62-4.030, 62-210.300(1), and 62-212.300(1), F.A.C., the notification requirements of 40 CFR 60.7 and 60.48c, the applicability of 40 CFR Part 60, Subpart Dc, and the emission limiting standards of 62-296.406, F.A.C.

The initial notification requirements of 40 CFR 60.7 and 60.48c have been met through the submittal of the state air construction permit application. The units will be limited to firing only natural gas.

The Best Available Control Technology (BACT) determination for particulate matter and sulfur dioxide requires the firing of Clean Pipeline Quality Natural Gas and Good Combustion Practices.

3.3 Project No. 099-0015-003-AC

The project involves the replacement of the existing perchloroethylene dry cleaning equipment with new equipment. The new equipment will include two (2) dry-to-dry machines manufactured by Union and will be equipped with a refrigerated condenser. The applicant has requested a cap (<2,100 gallons) on annual perchloroethylene use to avoid major source designation.

The initial notification requirements of 40 CFR 63.9 and 63.324(a) have been met through the submittal of the state air construction permit application. The equipment is required to comply with the applicable requirements of 40 CFR Part 63 – Subpart M, National Perchloroethylene Air Emission

Standards for Dry Cleaning Facilities upon startup. The equipment is subject to the area source requirements of the Subpart M and the General Provisions of 40 CFR Part 63, Subpart A.

3.4 Pollution Prevention:

In a memorandum dated May 28, 1992, the U.S. EPA defined “Pollution Prevention” base on an environmental management hierarchy. The hierarchy included; 1) Prevention, 2) Recycling, 3) Treatment, and 4) Disposal or Release. For the proposed project, the primary emphasis is on increased efficiency using state-of-the-art equipment. However, the overall impact of the project includes the following:

- Increased efficiency in the use of raw materials (Natural Gas and Perchloroethylene);
- Protection of our natural resources (Air Quality); and
- Reduction of hazardous substances (Perchloroethylene) entering the solid waste stream;

Based on the available information, the proposed project meets the pollution prevention objects of the Pollution Prevention Act of 1990 which includes source reduction, recycling, and treatment.

4.0 **RULE APPLICABILITY**

The proposed project is subject to preconstruction review under the applicable provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). This facility is located in Palm Beach County, an area designated as "maintenance" for the pollutant ozone and attainment for all other criteria pollutants in accordance with Rule 62-204.340, F.A.C. The facility is subject to the following air pollution control provisions:

Florida Administrative Code

- | | |
|------------------------------------|---|
| Chapter 62-4, F.A.C. | - Permits. |
| <i>Rule 62-4.030, F.A.C.</i> | - <i>General prohibition</i> |
| <i>Rule 62-4.130, F.A.C.</i> | - <i>Plant Operation – problems</i> |
| <i>Rule 62-4.160, F.A.C.</i> | - <i>General Permit Conditions.</i> |
| Chapter 62-204, F.A.C. | - Air Pollution Control - General Provisions |
| <i>Rule 62-204.800(7), F.A.C.</i> | - <i>NSPS, 40 CFR Part 60, Subpart Dc, Small-Commercial-Institutional Steam generating Units.</i> |
| <i>Rule 62-204.800(7), F.A.C.</i> | - <i>NSPS, 40 CFR Part 60, Subpart A</i> |
| <i>Rule 62-204.800(7), F.A.C.</i> | - <i>NSPS, 40 CFR Part 60 Appendices</i> |
| <i>Rule 62-204.800(10), F.A.C.</i> | - <i>NESHAP, 40 CFR Part 63 Subpart M.</i> |
| <i>Rule 62-204.800(10), F.A.C.</i> | - <i>NESHAP, 40 CFR Part 63, Subpart A</i> |
| Chapter 62-210, F.A.C. | - Stationary Sources - General Requirements |
| <i>Rule 62-210.300, F.A.C.</i> | - <i>Permits Required.</i> |
| <i>Rule 62-210.350, F.A.C.</i> | - <i>Public Notice and Comment.</i> |
| <i>Rule 62-210.370, F.A.C.</i> | - <i>Reports.</i> |
| <i>Rule 62-210.550, F.A.C.</i> | - <i>Stack Height Policy.</i> |
| <i>Rule 62-210.650, F.A.C.</i> | - <i>Circumvention.</i> |
| <i>Rule 62-210.700, F.A.C.</i> | - <i>Excess Emissions.</i> |
| Chapter 62-212, F.A.C. | - Stationary Sources - Preconstruction Review |
| <i>Rule 62-212.300, F.A.C.</i> | - <i>General Preconstruction Review Requirements</i> |
| Chapter 62-296, F.A.C. | - Stationary Sources - Emissions Standards |
| <i>Rule 62-296.320, F.A.C.</i> | - <i>General Pollutant Emission Limiting Standards.</i> |

Florida Administrative Code

- Rule 62-296.406, F.A.C. - Fossil Fuel Steam Generators with less than 250 mmBtu/hr Heat Input
- Rule 62-296.412, F.A.C. - Dry Cleaning Facilities
- Chapter 62-297, F.A.C. - Stationary Sources - Emissions Monitoring**
- Rule 62-297.310, F.A.C. - General Test Requirements.
- Rule 62-297.400, F.A.C. - EPA Test Methods Adopted by Reference

Code of Federal Regulations

- 40 CFR Part 60 - Subpart A, General Provisions**
- 40 CFR Part 60 - Subpart Dc, Small-Commercial-Institutional Steam Generating Units.**
- 40 CFR Part 63 - Subpart A, General Provisions**
- 40 CFR Part 63 - Subpart M, Perchloroethylene Dry Cleaning Facilities**

5.0 PROJECT ANALYSIS

The proposed projects can be classified as minor modifications at a minor source of air pollution under the new source review programs. The source’s potential emissions following the completion of the projects will remain below the major source thresholds of the preconstruction review and hazardous air pollutant programs. The source will include new emissions units subject to 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and 40 CFR Part 63, Subpart M – National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities. The source is a designated Title V Area Source.

5.1 Project No. 099-0015-002-AC

The operation of the steam generating units will result in the emissions of various air pollutants associated with the combustion of natural gas. Potential emissions associated with continuous and simultaneous operation of the units are identified below.

<u>Pollutant</u>	Emissions		<u>Reference</u>
	<u>lb/hr</u>	<u>TPY</u>	
Particulate Matter	0.16	0.68	AP-42, Section 1.4
Sulfur Dioxide	0.29	1.25	Mass Balance
Carbon Monoxide	1.72	7.55	AP-42, Section 1.4
Nitrogen Oxides	2.05	8.98	AP-42, Section 1.4
Volatile Organic Compounds	0.11	0.49	AP-42, Section 1.4
Lead	1.03x10 ⁻⁵	4.49x10 ⁻⁵	AP-42, Section 1.4

Rule 62-296.406, F.A.C. limits visible emissions from the units to 20 percent opacity except for one two-minute period per hour during which opacity shall not exceed 40 percent. In addition, Rule 62-296.406, F.A.C. limits sulfur dioxide and particulate matter emissions through the application of BACT. The proposed firing of only natural gas in the units has been determined to be BACT for this project.

40 CFR Part 60 Subpart Dc does not establish and emission limiting standards for natural gas fired steam-generating units. The additional notification requirements of 40 CFR 60.7 and 40 CFR 60.48c have been incorporated into the air construction permit’s terms and conditions.

5.2 Project No. 099-0015-003-AC

The operation of the perchloroethylene dry cleaning equipment will result in the emissions of a regulated hazardous air pollutant. Potential emissions associated with the operation of the equipment will be limited through a federally-enforceable cap on annual perchloroethylene usage. As defined in

40 CFR 63.320(h), a dry cleaning facility is an area source if it includes only dry-to-dry machines and has a total yearly perchloroethylene consumption greater than 2,100 gallons as defined in 40 CFR 63.320(g)(1).

40 CFR Part 63 Subpart M establishes Standards (40 CFR 63.322), Test Methods and Monitoring (40 CFR 63.323), and Reporting and Recordkeeping Requirements (40 CFR 63.324) that the proposed equipment, as designed, can meet. The additional notification requirements of 40 CFR 63.9 and 40 CFR 63.324 have been incorporated into the air construction permit's terms and conditions.

6.0 CONCLUSION

Based on the information provided by the applicant and other available information, the Health Department has reasonable assurance that the proposed projects, as described in this evaluation, and subject to the conditions in the proposed draft permits, will not cause or contribute to a violation of any ambient air quality standard, PSD increment, or any other technical provision of Chapters 62-204 through 62-297 of the Florida Administrative Code.

CERTIFICATION

Air Permit No.: 099-0015-002-AC

Facility: Boca Raton Resort and Club

Authorized Representative: Mr. William M. Pierce, Vice President

Location: 1501 East Camino Real Boulevard
Boca Raton, FL 33432-6127

UTM: Zone 17; 592.00 km E; 2913.7 km N

Project: **Air Construction Permit - Two(2) 10,46 mmBtu/hr Steam generating Units**

THIS IS TO CERTIFY that the air pollution engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403 of the Florida Statutes, and Chapters 62-209 through 62-297 of the Florida Administrative Code. However, other aspects of the design, including, but not limited to, the electrical, mechanical, structural, hydrological and geological features, have not been evaluated and are not part of this certification.

Darrel J. Graziani, P.E.
Air Pollution Control Section
Environmental Health and Engineering

Date: _____

CERTIFICATION

Air Permit No.: 099-0015-002-AC

Facility: Boca Raton Resort and Club

Authorized Representative: Mr. William M. Pierce, Vice President

Location: 1501 East Camino Real Boulevard
Boca Raton, FL 33432-6127

UTM: Zone 17; 592.00 km E; 2913.7 km N

Project: **Air Construction Permit - New Perchloroethylene Dry Cleaning Equipment**

THIS IS TO CERTIFY that the air pollution engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403 of the Florida Statutes, and Chapters 62-209 through 62-297 of the Florida Administrative Code. However, other aspects of the design, including, but not limited to, the electrical, mechanical, structural, hydrological and geological features, have not been evaluated and are not part of this certification.

Darrel J. Graziani, P.E.
Air Pollution Control Section
Environmental Health and Engineering

Date: _____