TECHNICAL EVALUATION

APPLICANT

Mr. James Hicks, Owner
Hicks' Land Clearing & Incinerator, LLC
3445 Old Moultrie Road, Lot A
St. Augustine, Florida 32086

Facility ID No. 1090446

PROJECT

Project No. 1090446-004-AO
Non-title V Operation Permit Renewal

COUNTY

St. Johns

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Waste and Air Resource Management
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

COMPLIANCE AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Compliance Assurance
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

November 21, 2014

1. 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 chapters:

Table 1 - Applicable Rules from the F.A.C.

Chapter	Description
62-4	Permits
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-212	Stationary Sources – Preconstruction Review
62-296	Stationary Sources – Emission Standards
62-297	Stationary Sources – Emissions Monitoring

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 activities. 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.

Federal regulations adopted by reference are given in Rule 62-204.800, F.A.C. State regulations approved by EPA are given in 40 CFR 52, Subpart K – Florida, also known as the State Implementation Plan (SIP) for Florida.

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.

Facility Process Description and Location

The Air Curtain Incinerator is (Standard Industrial Classification No. 4953). The burning site is located southwest of the intersection of County Rd 214 and Interstate I-95 in St. Johns County, St. Augustine, Florida

The existing facility consists of the following permitted emissions unit.

Emission unit 001, Air Curtain Incinerator

Facility Regulatory Categories

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

Processing Schedule

11/6/14 Non-Title V Air Permit Renewal Application received

Project Description

This is an application for Non-Title V Operation Permit Renewal, which authorizes the renewal operation of an Air Curtain Incinerator to burn land clearing debris.

Calculations

7.5 tons/hr (charging material) * 2 lb/ton (AP-42 of charging material) * 480 hr/yr * ton/2000 lb = 3.6 tons of PM/yr

7.5 tons/hr (charging material) * 2 lb/ton (AP-42 of charging material) * 8760 hr/yr * ton/2000 lb = 65.7 tons of PM/yr

PTE = 65.7 tons of PM/yr which is less than the Title V threshold of 100 tons of PM/yr

The ACI is limited to 2,184 hours per year (1090446-001-AC)

2. APPLICATION REVIEW

The applicant has not proposed any changes to the equipment or operation of the facility nor to the conditions of their current operating permit. Changes to the rules applicable to this facility are discussed under the Federal NSPS Provisions section of this document below.

State Requirements

- **Chapter 62-256, F.A.C** **Open Burning**
- **Chapter 62-296, F.A.C** **Stationary Sources – Emissions Standards**
- Rule 62-296.320, F.A.C General Pollutant Emissions Limiting Standards
- Rule 62-296.401(7), F.A.C Air Curtain Incinerator
- **Chapter 62-297, F.A.C** **Stationary Sources – Emissions Monitoring**
- Rule 62-297.310, F.A.C General Test Requirements
- Rule 62-297.320, F.A.C Standards for Persons Engaged in Visible Emissions Observations.

Federal NSPS Provisions

New Source Performance Standards (NSPS), Subpart CCCC—Standards of Performance for Commercial and Industrial Solid Waste Incineration Units, was updated on February 7, 2013, to redefine new units as those having been constructed on or after June 4, 2010. This update reclassifies EU001 as an existing unit. As a result, this emissions unit is now subject to Rule 62-204.800(9)(f)12, F.A.C. This rule adopts the model rule for existing air curtain incinerators found under 40 CFR 60.2810 through 60.2870 (which is part of NSPS, Subpart DDDD—Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units) as a state rule. However, the limitations and standards under the model rule above (and, by proxy, the state rule above) are the same as those found under NSPS, Subpart CCCC. Therefore, no change is being made to the specific conditions to which this unit is subject.

The construction Application was received on October 20, 2003.

CONCLUSION

Based upon the information provided by the applicant, the Department has reasonable assurance that renewal of the operation permit at the facility as described in the application for operation permit renewal will not cause or contribute to a violation of any technical provision of Rule 62-4, 62-204.800, 62-210, 62-212, 62-297.310, or 62-296.401, F.A.C.

The Department makes a determination that the-project will comply with all applicable state and federal air pollution regulations as conditioned by the renewal 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 permit. John Phillips is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Northeast District Office, 8800 Baymeadows Way, Suite 100, Jacksonville, FL 32256, Phone: 904/256-1700