TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

New River Solid Waste Association
Post Office Box 647
Raiford, Florida 32083

New River Regional Landfill
ARMS Facility ID No. 1250008

PROJECT

Project No. 1250008-006-AC
Application for Air Construction Permit
Installation of a 3,000 scfm, open, flare

COUNTY

Union

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Air Resources Section
7625 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

September 23, 2011

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects 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: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

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. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Process Description and Location

The applicant, New River Solid Waste Association, operates the New River Regional Landfill located at 24276 N.E. 157th Street, Raiford, Florida 32083. The UTM coordinates of the existing facility are Zone 17, 382.8 km East, and 3330.3 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

New River Regional Landfill, a municipal solid waste (MSW) landfill with a total site area of 500 acres, of which approximately 66.4 acres will be used for disposal of Class I solid waste and 16 acres will be used for disposal of Class III solid waste. The Class I Landfill currently consists of Cells 1 through 5.

The initial solid waste construction permit for the Class I landfill was issued on June 1, 1990. The landfill was modified in 2001. The Class III Landfill began waste acceptance in 1992 and is currently permitted to accept waste. The Class III landfill is also an active asbestos waste disposal site. A waste tire collection center is also included at this landfill.

The addition of liquids to bioreactor began on May 30, 2003. On September 9, 2008, State Solid Waste Program had issued minor permit modification No. 0013500-017 to Permit No.0013500-012-SC for bioreactor decommissioning. At present, the facility does not have or operate a bioreactor.

The landfill includes an active gas collection system consisting of both horizontal collection trenches and vertical gas collection wells. The collected landfill gas is routed to a knockout pot for the removal of formed condensate followed by destruction in a non-assisted candlestick utility flare that is rated at 2400 standard cubic feet per minute (scfm).

Flare Station: The flare station consists of the following equipments:

- An open flare (Perennial Energy) that is designed to handle maximum and minimum gas flow rate of 2400 scfm and 240 scfm respectively.
- Three 800-scfm 15 hp gas extraction centrifugal blowers (Hartzell Model), -45 wc inlet.
- A thermal convection mass flow meter.
- An optical flame scanner device or thermocouple to detect continuous presence of flame.
- A chart recorder to record gas flow rate and flare temperature every 15 minutes.
- Flare temperature measuring device so that any flare downtime is recorded. If the temperature fall below preset temperature, the flare and the blowers will be automatically shutdown.

The collection line at the flare station also will be equipped with sampling ports to monitor pressure, gas concentrations, and temperature of the incoming LFG.

Facility Regulatory Categories

- The facility is not identified as 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 a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.
- The facility operates units subject to the following applicable New Source Performance Standards (NSPS) in Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60): Subpart A (General Provisions), Subpart IIII (Compression Ignition Internal Combustion Engines) and Subpart WWW (MSW Landfills).
- The facility operates units subject to the following applicable National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Title 40, Part 63 of the Code of Federal Regulations (40 CFR 63): Subpart A (General Provisions), Subpart AAAA (MSW Landfills) and Subpart ZZZZ (Reciprocating Internal Combustion Engines).

Project Description

The landfill was issued Solid Waste Permit No. 13500-023-SC to construct and operate a new solid waste disposal area (Cell 6) adjacent to existing Cells 1-5. The landfill is requesting a modification to Existing Emissions Units 001 and 002 to include the new solid waste disposal area. Cell 6 will increase the Class I disposal capacity by approximately 1.3 million megagrams. The existing permitted disposal capacity of Cells 1-5 is approximately 3.7 megagrams.

In addition to constructing the landfill expansion, the New River Solid Waste Association proposes to replace the existing 2,400 scfm open flare and blower station with a new 3,000 scfm open flare and blower station. The existing flare and blower station was constructed in 2001 and serves as the primary

control device for the landfill gas collected from Cells 1-5. The flare and blower station is being replaced to increase the control device destruction capacity for the Cell 6 expansion and the next potential cell expansion, and modernize the control device for increased reliability, and future integration with a proposed landfill gas-to-energy facility.

The landfill proposes to operate the existing 2,400 scfm open flare as a backup should the 3,000 scfm flare becomes non-operational.

Proposed Work

The permittee is authorized to conduct this project as follows:

- Modification of Emissions Units 001 and 002 to include the new solid waste disposal area, Cell 6;
- Modification of Emissions Units 001 and 002 to include the new solid waste disposal area, Cell 6;
- Replace the existing 2,400 scfm open flare with a new open flare designed to handle maximum and minimum gas flow rates of 3,000 scfm and 300 scfm respectively;
- Replace the existing three, 800 scfm 15 hp gas extraction centrifugal blowers with two new 1,500 scfm 40 HP multistage centrifugal LFG blowers, -60 wc inlet;
- Installation of one 48 in. condensate knock out pot with 20 micron demister/filter as replacement of the existing condensate knock out pot associated with the 2,400 scfm flare;
- Installation of flare and blower station associated instrumentation and equipment.

Also as a part of this project, the applicant identified the following internal combustion engines located onsite:

Engine Make	Description	Date Acquired On site	Fuel Type	HP	Ignition Type
Emergency Generators:					
Cummins	71 Fermont Diesel Generator	2/17/2006	Diesel	Unknown	CI
Mitsubishi/Generac	60 KW Diesel Generator (office)	9/25/2006	Diesel	60	CI
Olympian	Diesel Generator - Flare	Unknown	Diesel	85	CI
Miscellaneous ICE:					
Honda	Gas Generator - 5346540	8/2/1999	Gasoline	11	SI
Perkins/Wacker	Generator, Portable	5/10/2000	Gasoline	71	SI
Perkins/Wacker	02 Godwin Pump w/Trailer	1/14/2004	Diesel	84	CI
Onan	Generator Floodlight Set	2/17/2005	Diesel	20	CI
John Deere	6" Godwin Dir- Prime PumpSet	9/19/2005	Diesel	80	CI
CAT	Peterson Grinder w/CAT Eng	12/1/2005	Diesel	450	CI
Morbark	Chipper Mulcher	11/8/2006	Diesel	325	CI
Honda/Husqvarna	13 HP-6500W Generator	7/13/2007	Gasoline	13	SI

The applicant stated that these engines qualify for the conditional exemption for internal combustion engines in Rule 62-210.300(3)(a)35., F.A.C. However, the application did not address whether the engines burned used oil or fuels other than natural gas, propane, gasoline and diesel, and the total maximum annual amount of each fuel burned by the engines as required by the rule. As such, the Department was unable to concur at the time of the application submittal that the engines met the criteria of the exemption. The Department requested the submittal of this information in email correspondence dated August 16, 2011.

On September 15, 2011, the consultant for NRRL stated that they were unable to determine the annual fuel burned per engine, but provided a run time in hours per year per engine. The consultant stated that the engines only burned gasoline or diesel, and also provided additional information that aided with the applicability of federal rules Part 60 Subparts IIII and JJJJ, and Part 63 Subpart ZZZZ.

From the September 15, 2011 submitted information, the Department calculated potential air emissions from the engines using AP-42, Table 3.3-1:

Engine Make	**NOx Emissions (TPY)**	**CO Emissions (TPY)**	**SOx Emissions (TPY)**	**PM-10 Emissions (TPY)**	**TOC Emissions (TPY)**
Honda	0.0024	0.0015	0.0001	0.0002	0.0033
Perkins/Wacker	0.0391	0.0247	0.0021	0.0026	0.0533
Onan	0.0124	0.0027	0.0008	0.0009	0.0010
John Deere	0.0496	0.0107	0.0033	0.0035	0.0040
CAT	0.9765	0.2104	0.0646	0.0693	0.0778
Perkins/Wacker	0.0521	0.0112	0.0034	0.0037	0.0041
Cummins	0.0006	0.0001	0.0000	0.0000	0.0000
Mitsubishi/Generac	0.0372	0.0080	0.0025	0.0026	0.0030
Morbark	0.2015	0.0434	0.0133	0.0143	0.0161
Olympian	0.0343	0.0074	0.0023	0.0024	0.0027
Honda/Husqvarna	0.0029	0.0018	0.0002	0.0002	0.0039
Total	**1.4085**	**0.3220**	**0.0926**	**0.0997**	**0.1691**

The Department also roughly calculated fuel usage for each engine (with the exception of the Cummins 71 Fremont Diesel Generator), from the submitted data, the typical gasoline and diesel heat content in BTU/gal, and an assumed Thermal Efficiency of 30% for each engine.

$$\text{Fuel Flow (Gal/hr)} = (\text{HP} \times 2545\ \text{BTU/HP-Hr}) \ / \ (\text{Heat Content in BTU/gal} \times \text{TE})$$

Engine Make	Fuel Flow (Gal/hr)	Applicant Stated Operation Hours (Hrs/Yr)	Fuel Flow (Gals/Yr)
Honda[1]	0.72	40	28.8
Perkins/Wacker[1]	4.63	100	463.0
Onan	1.21	40	48.4
John Deere	4.85	40	194.0
CAT	27.27	140	3817.8
Perkins/Wacker	5.09	40	203.6
Cummins	Unknown	40	Unknown
Mitsubishi/Generac	3.64	40	145.6
Morbark	19.69	40	787.6
Olympian	5.15	26	133.9
Honda/Husqvarna[1]	0.85	40	34.0

[1]Gasoline Fuel

Total Gasoline (GPY)	**525.8**
Total Diesel (GPY)	**5370.9**

In accordance with Rule 62-210.300(3)(a)35. c., F.A.C., collectively, all engines claiming the Rule 62-210.300(3)(a)35., F.A.C. exemption at the same facility shall not burn more than the equivalent collective maximum annual amounts of multiple fuels, as addressed subparagraph e.

e. If burning more than one type of fuel, the equivalent collective annual amount of each fuel burned by the engines claiming this exemption at the same facility shall not exceed the collective maximum annual amount of such fuel, as given in subparagraph d., multiplied by a fuel percentage. The fuel percentage is the percentage ratio of the total amount of the fuel burned by all engines claiming this exemption at the same facility to the total amount of such fuel allowed to be burned by all engines claiming this exemption at the same facility pursuant to sub-subparagraph d. The sum of the fuel percentages for all fuels burned by the engines claiming this exemption at the same facility must be less than or equal to 100 percent.

d. If burning only one type of fuel, the collective annual amount of fuel burned by all engines claiming this exemption at the same facility shall not exceed 5,400 gallons of gasoline, 64,000 gallons of diesel fuel, 288,000 gallons of propane, or 8.8 million standard cubic feet of natural gas.

Gasoline: 525.8 gallons/5,400 gallons = 0.097

Diesel: 5370.9 gallons/64,000 gallons = 0.839

0.097 + 0.839 = 0.936 < 100 percent

With regard to the Cummins engine, the Rule 62-210.300(3)(a)35., F.A.C. exemption allows the sum of the fuel percentages for all fuels burned by the engines to equal or be less than 100 percent. The consultant has stated this engine burns diesel fuel, and is an emergency use generator therefore back-calculating results in the following:

1.0 - 0.097 (gasoline ratio) = 0.903 (maximum diesel ratio)

0.903-0.839 (diesel ratio of all engines except Cummins engine) = 0.064 (diesel ratio for Cummins Engine)

0.064 x 64,000 gallons = 4096 gallons/yr maximum could be burned by Cummins engine

4096 gallons/yr /100 hours operation max (emergency generator) = 40.96 gallon/hr

The Cummins engine would be able to fire up to 40.96 gallons per hour of diesel fuel, and collectively the engines would still meet the Rule 62-210.300(3)(a)35., F.A.C. exemption. This quantity is significantly more than what is estimated for the largest engine (CAT engine 450 HP).

Based on these calculations, the Department concludes that the engines meet the Rule 62-210.300(3)(a)35., F.A.C. exemption. As such, pursuant to Rule 62-210.300, F.A.C., an air construction permit is not required for these engines.

As a condition of the exemption, because it appears that these engines are subject to Part 63 Subpart ZZZZ and a few may also be subject to Part 60 Subpart IIII, NRRL is required to comply with all limitations and requirements of the Subparts as they apply to the engines. In addition, these federal standards are required to be addressed in the facility's Title V Operation Permit.

Based on the submitted information, the following engines may be subject to 40 CFR 60 Subpart IIII:

Engine Make	Description	Date Acquired On site	Fuel Type	HP	Ignition Type
Mitsubishi/Generac	60 KW Diesel Generator (office)	9/25/2006	Diesel	60	CI
Morbark	Chipper Mulcher	11/8/2006	Diesel	325	CI

Based on the submitted information, it doesn't appear that any of the identified engines are subject to 40 CFR 60 Subpart JJJJ at this time.

Based on the applicability of 40 CFR 63 Subpart ZZZZ, all of the engines are subject to this subpart.

In accordance with 63.6595(a)(1) the following engines must comply with the applicable Subpart emission limitations and operating limitations no later than May 3, 2013 (existing stationary CI RICE located at an area source of HAP emissions):

Engine Make	Description
Perkins/Wacker	02 Godwin Pump w/Trailer
Onan	Generator Floodlight Set
John Deere	6" Godwin Dir- Prime PumpSet
CAT	Peterson Grinder w/CAT Eng
Cummins	71 Fermont Diesel Generator

In accordance with 63.6595(a)(1), the following must comply with the applicable Subpart emission limitations and operating limitations no later than October 19, 2013 (existing stationary SI RICE located at an area source of HAP emissions):

Engine Make	Description
Honda	Gas Generator - 5346540
Perkins/Wacker	Generator, Portable

In accordance with 63.6595(a)(6) the following engines must comply with the applicable Subpart emission limitations and operating limitations at this time (If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.)

Engine Make	Description
Mitsubishi/Generac	60 KW Diesel Generator (office)
Olympian	Diesel Generator - Flare
Morbark	Chipper Mulcher
Honda/Husqvarna	13 HP-6500W Generator

The consultant provided a designation as to whether the engine was classified as existing or new. In accordance with 63.6590(a)(1)(iii) and (2)(iii) of 63 Subpart ZZZZ, existing and new stationary RICE at an area source of HAP, are defined respectively as follows:

63.6590(a)(1)((iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

63.6590(a)(2)((iii) A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

Application Processing Schedule

07/25/2011	Department received the application for a minor source air pollution construction permit;
08/16/2011	Additional information requested via electronic mail.
08/24 & 25/11	Additional information received
09/08 & 15/11	Additional information received; application complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C.

Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review.

A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds.

A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once a project becomes subject to PSD preconstruction review, each PSD pollutant is reviewed for PSD applicability based on emissions thresholds known as the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns

or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); Fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as nonmethane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

The project is located in Union County, which is in an area that is currently in attainment with the state and federal AAQS or otherwise designated as unclassifiable.

The existing facility is not in one of the 28 PSD-major facility categories, therefore the facility would be considered a PSD Major source if it emits or has the potential to emit 250 tons or more of any regulated air pollutant. Existing facility pollutant emissions are less than this threshold therefore the facility is classified as being an existing PSD minor source facility.

In order for this project to be subject to PSD preconstruction review, the potential emissions from the proposed project would have to equal or exceed the PSD Major Source thresholds itself.

Table A. summarizes the applicant's potential emissions from the proposed project based on the submitted application.

Greenhouse Gas Emissions

Although Florida does not regulate greenhouse gas (GHG) emissions, EPA recognized GHG as a PSD pollutant subject to PSD preconstruction review beginning on January 2, 2011. For permits issued on or after July 1, 2011, greenhouse gas emissions are subject to regulation at existing stationary sources that have the potential to emit of 100,000 tons per year of carbon dioxide equivalents (CO_2e) when the stationary source undertakes a modification that will results in an emissions increase of 75,000 tpy CO_2e or more.

On July 20, 2011, EPA promulgated the Deferral for CO_2 emissions from Bioenergy and Other biogenic Sources under the Prevention of Significant Deterioration (PSD) and Title V Programs. This action defers for a period of three (3) years the application of the PSD and Title V Permit requirements to biogenic carbon dioxide emissions from bioenergy and other biogenic stationary sources. Pursuant to 40 CFR 71.2(2), prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include carbon dioxide emissions resulting from the combustion or decomposition of non-fossilized and

biodegradable organic material originating from plants, animals, or micro-organisms (including products, by-products, residues and waste from agriculture, forestry and related industries as well as the non-fossilized and biodegradable organic fractions of industrial and municipal wastes including gases and liquids recovered from the decomposition of non-fossilized and biodegradable organic material).

In accordance with Rule 62-210.200(189)(c), F.A.C., fugitive emissions are excluded from the Major Source determination. The existing Greenhouse gases site potential to emit (excluding fugitive emissions) is 13,709 tons per year, which is less than 100,000 tons per year threshold. Total facility potential greenhouse gas emissions after the proposed project are 16, 019 tons per year (excluding fugitive emissions).

Table A. Applicant's Potential Emissions from Project (Tons per Year) and PSD Applicability

Pollutant	Site Potential to Emit Post Project (Excluding Fugitive Emissions)[1]	PSD Major Thresholds	Subject to PSD?
SO_2	4.1	250	No
NO_X	15.4	250	No
CO	18.1	250	No
PM/PM_{10} [2]	5.9	250	No
VOC (NMOC)	2.1	250	No

[1] In accordance with Rule 62-210.200(189)(c), F.A.C., fugitive emissions are excluded from the Major Source determination.

[2]The Department adopted by reference the federal ambient air quality standard for $PM_{2.5}$, but has not yet promulgated the implementing regulations for PSD preconstruction review (e.g., define $PM_{2.5}$ as a PSD pollutant with a significant emission rate for PSD applicability).

Table B. Applicant's Greenhouse Gases Existing Potential Emissions & Potential Emissions from Project (Tons per Year) and PSD Applicability

Pollutant	Site Potential to Emit (Excluding Fugitive Emissions)[1]	PSD Major Thresholds	Subject to PSD?
GHG	13,709	100,000	No
GHG	16,019[2]	75,000	No

[1] In accordance with Rule 62-210.200(189)(c), F.A.C., fugitive emissions are excluded from the Major Source determination.
[2] Post Project modification.

Pursuant to Rule 62-212.400, F.A.C., New River Solid Waste Association provided information to show that the project will not result potential emissions such that preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality is required.

NSPS Applicability

The facility is currently subject to the New Source Performance Standards (NSPS) requirements in 40 CFR 60, Subpart WWW (MSW Landfills), and 40 CFR 60 Subpart A, General Provisions. This project does not change the applicability of these subparts.

NESHAP Applicability

The facility is currently subject to the National Emission Standards for Hazardous Air Pollutants requirements in 40 CFR 63, Subpart AAAA, (MSW Landfills), and 40 CFR 63, Subpart A, General Provisions. The facility is classified as an existing facility for purposes of the NESHAP. This project does not change that designation.

Applicability of Previously Issued Permits

Existing Permits and Regulations: The conditions of this permit supplements all other previously issued air construction and operation permits for these emission units. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting and the like.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft 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 draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Rita Felton-Smith 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, 7525 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590, Phone: 904/256-1700.