TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Utilities Commission, City of New Smyrna Beach
P.O. Box 100
New Smyrna Beach, FL 32170

New Smyrna Beach Power Plant (Smith Street Generating Facility)

Facility ID No. 1270004

PROJECT

Project No. 1270004-005-AF
Application for Minor Source Air Operation Permit
Project Name: Renewal

COUNTY

Volusia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

January 10, 2011

Prepared by Jeffrey Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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 applicable 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 categories. 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.

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.

I. <u>Project Description:</u>

A. Applicant:

Mr. Tim Beyrle, Director of System Operations
Utilities Commission, City of New Smyrna Beach
P.O. Box 100
New Smyrna Beach, FL 32170

B. Professional Engineer: N/A

C. Project Location:

305 Smith Street
New Smyrna Beach, FL

D. Project Summary:

The purpose of this project is issuance of a FESOP for eight diesel generators.

E. Application Information:

Application Received and complete on: 10/18/2011

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Source of unconfined particulate matter emissions.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	The generators were manufactured and installed before 2006. 40 CFR Part 60, Subpart IIII does not apply.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	Y	Subject to 40 CFR Part 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a non-Title V source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing required. Performance testing required by 40 CFR Part 63, Subpart ZZZZ within 180 days after the compliance date.

III. Summary of Emissions

Pollutant	Brief description	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
PM	Generators	3.1*	99.0
NOx	Generators	98.7*	99.0
SO2	Generators	1.8*	99.0
CO	Generators	26.2*	99.0
VE	Generators		20 percent opacity

*Based on 450,000 gallons of fuel per year and sulfur content of 0.05 percent weight.

IV. Federal NSPS and/or NESHAP Provisions

A. NSPS, 40 CFR 63 Subpart A, General Provisions

B. NSPS, 40 CFR 60 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C. The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. 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. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).