TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Cloer and Sons, Inc.
P.O. Box 1446
Edgewater, FL 32132

Edgewater Facility

Facility ID No. 1270189

PROJECT

Project No. 1270189-003-AO
Application for Minor Source Air Operation Permit
Project Name: Operation Permit Renewal

COUNTY

Volusia, Florida

PERMITTING AUTHORITY

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

January 2, 2013

Prepared by Stephen Amirault

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. Project Description:

A. Applicant:

Mr. Kevin Cloer, Vice President
Cloer and Sons, Inc.
P.O. Box 1446
Edgewater, FL 32132

B. Project Location:

3096 Eels Grove Road
Edgewater, Florida

D. Project Summary:

As further described in the permit, this project is for an Air Operation Permit renewal.

E. Application Information:

Application Received on: November 29, 2012
Additional Information Requested on: N/A
Application Complete: November 29, 2012

II. PSD Applicability for Project

As provided in the application, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

III. 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 62-210.300, F.A.C. – Stationary Source General Requirements	Y	Not exempt from general permitting requirements
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	Incinerating operations are a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	there is no applicable source category
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	The air curtain incinerator (ACI) is subject to Rule 62-296.401 (7) – Air Curtain Incinerators
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Volusia 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	Y	The ACI is subject to Section 40 CFR 60.2245 through 60.2260 of

Subject to:	Y/N	Comments
(NSPS– 40 CFR 60)		NSPS, Subpart CCCC—Standards of Performance for Commercial and Industrial Solid Waste Incineration Units
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
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a natural minor source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements	Y	VE testing is required for EU No. 001

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (lbs/hr., tpy, lbs/ton, etc., as applicable)	Allowable Emissions (lbs/hr., tpy, lbs/ton, opacity, etc.)
PM	001 - Air Curtain Incinerator	65 tpy*	65 tpy*
VE	001 - Air Curtain Incinerator		Less than 10 percent opacity, and during startup periods, which shall not exceed the first thirty (30) minutes of operation, an opacity of up to thirty-five percent (35%), averaged over a six (6) minute period

* Calculation based on AP-42 Table 2.1-12 PM Emission factor or 13 lb/ton and permitted capacity of 10,000 tons per consecutive 12-month period.

V. Federal NSPS and/or NESHAP Provisions

A. 40 CFR 60, Subpart CCCC - The air curtain incinerators are subject to Section 40 CFR 60.2245 through 60.2260 of NSPS, Subpart CCCC-Standards of Performance for Commercial and Industrial Solid Waste Incineration Units.

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).