Florida Community Services Corporation
Seacrest Biosolids Dryer Facility
Facility ID No.: 1310261
Walton County

Air Operation Permit
Permit No.: 1310261-003-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, FL 32502-5740
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Air Operation Permit
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Florida Department of Environmental Protection

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Secretary

Permittee:
Florida Community Services Corporation

Permit No.: 1310261-003-AO
Facility ID No.: 1310261
SIC No(s).: 49, 4952
Project: Air Operation Permit

This permit is for the operation of the Biosolids Dryer Facility located at the Seacrest Wastewater Treatment Facility on the north side of Highway 98, approximately six miles west of the Bay County line, Walton County; UTM Coordinates: Zone 16, 590.01 km East and 3356.68 km North; Latitude: 30° 20' 00" North and Longitude: 86° 03' 45" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: February 1, 2013
Renewal Application Due Date: December 3, 2017
Expiration Date: February 1, 2018

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

J. C. Harp

J. Charles Harp
Program Administrator
Waste Management/Air Resources
Northwest District

JCH/ha/c

Section I. Facility Information.

This is a renewal of permit 1310261-002-AO, effective April 1, 2008.

Subsection A. Facility Description.

The Seacrest Wastewater Treatment Facility (WWTF) receives, treats, processes and disposes of domestic wastewater. This facility utilizes a Biosolids Dryer Facility consisting of a Sludge Feed System, a Dragon Dryer System, a Thermal Fluid System, a Dryer Off-gas Treatment System and a Sludge Discharge System. Biosolids are dried with a Dragon Dryer system that is an indirect sludge dehydrator with a heat exchanger. The Biosolids dehydrator and the thermal oil heat exchanger use natural gas at rates of 4.5 MMBtu/hour and 7.0 MMBtu/hour, respectively. The dryer system is manufactured by Eclipse Combustion and consists of one dehydrator with three burner systems: Model numbers TJ0200, TJ0150 and TJ100. The dryer system can evaporate 4,250 pounds of water per hour from 2.5 wet tons per hour of biosolids.

Dried biosolids sludge is injected with a dust binding agent at the front end of a conveyor system (Dustol system), effectively controlling dust and minimizing odor. The conveyor system feeds a centrifuge which discharges into uncovered rollaway containers. Fugitive emissions from the conveyor system and loading containers are estimated at 0.56 tons per year of particulate matter (PM).

A MicroMist Condenser manufactured by EnviroCare Systems, Inc., and ducting handle the exhaust gases from the dryer generated by the removal of moisture from the sludge, removing PM (an estimated 0.05 tons per year of PM are emitted). The condenser consists of a quench water tray, a sub cooler water tray, a Venturi stage, a mist eliminator and required spray nozzles.

The indirect drying of the biosolids sludge with the Dragon Dryer, allows the facility to be exempt from 40 CFR Part 61 Subpart E, National Emission Standard for Mercury. According to rule 61.51(m), *Sludge dryer* means a device used to reduce the moisture content of sludge by heating to temperatures above 65°C (ca. 150°F) directly with combustion gases. This facility is subject to the requirements of Rules 62-296.320(2) and (4)(b), F.A.C., for objectionable odor and visible emissions, respectively.

Based on the permit application received January 14, 2013, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Biosolids Dryer System

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

<u>These documents are on file with permitting authority:</u>
Permit Application received January 14, 2013
Appendix AP-1, Thermal Fluid Systems, Inc., Installation, O&M Manual
Appendix CP-1, EnviroCare International, Inc., MicroMist O&M Manual
Appendix CP-2, Seepex Pumps & Accessories O&M Manual

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix G-1, General Conditions, is a part of this permit.

2.a. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

2.b. If the Department determines the facility is emitting objectionable odors, Permittee shall submit an odor remediation plan within 45 days of receipt of written notification from the Department. The plan shall include, but not be limited to, dispersion modeling analysis, strategies to reduce odor and modifications of manufacturing production cycles, manufacturing methods and/or plant exhaust systems. [Rule 62-296.320(2), F.A.C. and permit 1310261-001-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that 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 Department. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7)(b), F.A.C.]

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. Unconfined Particulate Matter No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Paving and maintenance of roads, parking areas and yards.
b) Posting of speed signs.
c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d) Landscaping or planting of vegetation.

e) Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c), F.A.C., and permit 1310261-001-AC]

7. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit four permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rule 62-4.090, F.A.C.]

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850.595.8300; Fax: 850.595.8096

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us.

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.8300, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

10. Operations and Maintenance (O&M) Plan. This plan outlines the procedures the permittee incorporates during the normal operation of this facility and provides necessary assurance that the facility will operate in compliance. The permittee shall follow all procedures outlined in the most recently approved O&M Plan (Appendices AP-1, CP-1 and CP-2). These documents are on file with the permitting authority and the permittee shall retain a copy at the facility.

{Permit Note: An O&M plan should be a living document that provides procedures to help in maintaining the subject facility in compliance with applicable air regulations. Keeping this document up to date with the facility's current activities will not require any permit action; however such modifications shall be submitted to the Department for approval. This does not alleviate the facility from the air construction permitting requirements for facility modifications per Rule 62-210.300(1)(a), F.A.C.}

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Biosolids Dryer System

This emissions unit consists of a Biosolids Dryer System. Biosolids are dried with a Dragon Dryer system that is an indirect sludge dehydrator with a heat exchanger. The Biosolids dehydrator and the thermal oil heat exchanger use natural gas at rates of 4.5 MMBtu/hour and 7.0 MMBtu/hour, respectively. The Dragon dryer is manufactured by Eclipse Combustion and consists of one dehydrator with three combustion (burner) systems within the dryer: Model numbers TJ0200, TJ0150 and TJ100.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum wet sludge feed rate to the dryer shall not exceed 2.5 wet tons/hour of biosolids, based on a monthly average. [Rules 62-4.160(2), 62-210.200(PTE), F.A.C., and permit 1310261-001-AC]

A.2. Methods of Operation - (i.e., Fuels). The dryer shall be exclusively fueled by natural gas. [Rules 62-4.160(2), 62-210.200(PTE), F.A.C., and permit 1310261-001-AC]

A.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 4,160 hours/year. [Rules 62-4.160(2), 62-210.200(PTE), F.A.C., and permit 1310261-001-AC]

Emission Limitations and Standards

A.4. **See Facility-wide Condition, General Visible Emissions Standard**. Visible emissions shall not be equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). [Rule 62-296.320(4)(b), F.A.C., and permit 1310261-001-AC]

{Permitting Note: Although no testing is specifically required, with good reason the Department can require a compliance verification test as specified by Facility-wide Condition, Special Compliance Tests.}

Test Methods and Procedures

A.5.a. If a special compliance test is required per Facility-wide Condition, Special Compliance Tests, the test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070, 62-297.310(7), 62-297.401(9), F.A.C., and permit 1310261-001-AC]

A.5.b. Special compliance test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.5.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% 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 days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Monitoring of Operations

A.6. The Dustol system shall be in operation at all times the biosolids dryer is being operated, other than periods of malfunction (which shall be minimized but in no case exceed two hours in any 24-hour period). These periods will be classified as excess emissions. Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rules 62-4.070 and 62-210.700(1), F.A.C., and permit 1310261-001-AC]

{Permitting Note: Malfunction is defined in Rule 62-210.200(195), F.A.C., as any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner. Be aware excess emissions may result in violation of Facility-wide Condition, Objectionable Odor Prohibited.}

Recordkeeping and Reporting Requirements

A.7. Permittee shall maintain monthly records of hours of operation and dryer production rates. These records shall be available for Department inspection and kept for a minimum of five years. [Rule 62-4.070, F.A.C., and permit 1310261-001-AC]

A.8. Permittee shall notify the Department in accordance with Rule 62-4.130, F.A.C. (see note below) and maintain a log of malfunctions of the Dustol system. These records shall be available for Department inspection and kept for a minimum of five years. [Rule 62-4.070, F.A.C., and permit 1310261-001-AC]

{Permitting Note: 62-4.130 Plant Operation - Problems. - If Permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, Permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release Permittee from any liability for failure to comply with Department rules.}

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.