

## Memorandum

# Florida Department of Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation  
THROUGH: Jon Holtom, Title V Section *JH*  
FROM: Yousry (Joe) Attalla, Title V Section *YHA*  
DATE: August 10, 2010  
SUBJECT: Draft/Proposed Permit No. 0050031-013-AV  
Bay County Utility Services Department, Bay County Waste-to-Energy Facility  
Title V Air Operation Permit Renewal

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Statement of Basis;
- Draft/Proposed Permit; and,
- P.E. Certification.

This is the draft/proposed permit No. 0050031-013-AV, for the renewal of Title V air operation permit No. 0050031-010-AV and to incorporate the changes authorized by air construction permit No. 0050031-012-AC, for the existing Bay County Waste-to-Energy Facility. The applicant requested that Municipal Waste Combustors (MWC) Units 1 and 2 be rerated from 245 tons per day (TPD) per unit of Municipal Solid Waste (MSW) to 255 TPD per unit of MSW, which was the original design capacity of the unit. This change, which was authorized by permit No. 0050031-012-AC, reclassified the units from small MWC subject to the NSPS provisions in Subpart BBBB to large MWC subject to the emissions guidelines in Subpart Cb and Eb. The rerating requires the installation of new fan blades in each unit to achieve the higher throughput rate and provide increased energy efficiency. The permit has been reformatted to reflect the current permit style. The Statement of Basis provides a summary of the project and the rationale for issuance. The P.E. certification briefly summarizes the proposed project.

The application for Title V renewal was received on February 1, 2010, with a request for concurrent AC revision to increase the capacity of the boilers. The department sent a combined request for additional information on March 29<sup>th</sup>, 2010 and received a combined response on April 26<sup>th</sup>, 2010. The response to the AC portion of the RAI was not sufficient, prompting much discussion between the NSR group and the applicant's consultant. Additional information was received regarding the AC permit on May 24<sup>th</sup>, making the AC revision application complete. On June 7<sup>th</sup>, the applicant requested that the projects be issued separately, rather than in a combined public notice. On June 17<sup>th</sup>, Joe found an engine buried in the previous insignificant unit list that wasn't well identified in the current application, so we sent a second RAI for the Title V application to gather the necessary ICE information. The Draft AC was issued on June 22<sup>nd</sup> and the negotiated language was worked into the draft Title V permit. A response to the ICE questions was received on July 2<sup>nd</sup>. Comments on the draft AC permit were received during the comment period. Changes to the AC were negotiated and made in the final AC permit, which was issued on July 22<sup>nd</sup>, causing additional revisions to the draft Title V permit. The completeness date for the Title V project could either be May 24<sup>th</sup>, June 7<sup>th</sup>, June 22<sup>nd</sup>, July 2<sup>nd</sup> (most appropriate), or arguably even July 22<sup>nd</sup> with the revisions contained in the final AC. Using the earliest date of May 24<sup>th</sup>, day 90 is August 22<sup>nd</sup>. If choosing to use July 2<sup>nd</sup>, day 90 would be September 30<sup>th</sup>. There is no ongoing/open enforcement case for this facility, according to the Northwest District Office.

We recommend your approval of the attached draft/proposed Title V permit renewal/revision.

**P.E. CERTIFICATION STATEMENT**

**PERMITTEE**

Bay County Utility Services Department  
3410 Transmitter Rd.  
Panama City, Florida 32404

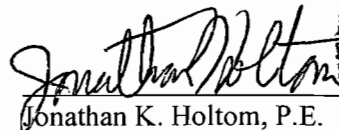
Permit No. 0050031-013-AV  
Facility ID No. 0050031  
Bay County Waste-to-Energy Facility  
Title V Air Permit Renewal  
Bay County, Florida

**PROJECT DESCRIPTION**

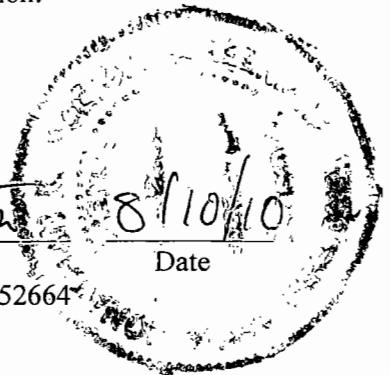
This project is for the renewal of Title V air operation permit No. 0050031-010-AV, and to incorporate the changes authorized in air construction permit No. 0050031-012-AC (PSD-FL-129E), for the existing Bay County Waste-to-Energy Facility. The applicant requested that Municipal Waste Combustors (MWC) Units 1 and 2 be rerated from 245 tons per day (TPD) per unit of Municipal Solid Waste (MSW) to 255 TPD per unit of MSW, which was the original design capacity of the unit. This change, which was authorized by permit No. 0050031-012-AC, reclassified the units from small MWC subject to the NSPS provisions in Subpart BBBB to large MWC subject to the emissions guidelines in Subpart Cb and Eb. The permit has been reformatted to reflect the current permit style.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*

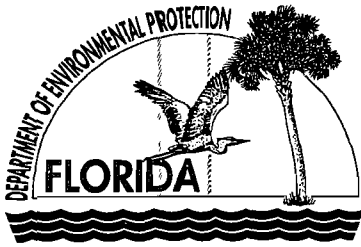
This review was conducted by Yousry (Joe) Attalla under my responsible supervision.

  
Jonathan K. Holtom, P.E.

Registration Number: 0052664



Date



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

*Electronic Mail – Received Receipt Requested*

Glenn Ogborn, Solid Waste Superintendent  
Bay County Utility Services  
3410 Transmitter Rd.  
Panama City, Florida 32404

Re: Permit No. 0050031-013-AV  
Bay County Waste-to-Energy Facility  
Title V Air Operation Permit Renewal


Dear Mr. Ogborn:

Enclosed is the draft/proposed permit package to renew the Title V air operation permit for Bay County Waste-to-Energy Facility. This facility is located in Bay County at 6510 Bay Line Drive, Panama City, Florida. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V renewal.
- The draft/proposed Title V air operation permit renewal, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the draft/proposed permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Title V Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication.

If you have any questions, please contact the Project Engineer, Yousry (Joe) Attalla, by telephone at (850) 921-9527 or by email at [yousry.attalla@dep.state.fl.us](mailto:yousry.attalla@dep.state.fl.us).

Sincerely,

  
Trina Vielhauer, Chief  
Bureau of Air Regulation

8/16/10  
Date

Enclosures  
TLV/jkh/ya

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**WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

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*In the Matter of an  
Application for Title V Air Operation Permit by:*

Bay County Utility Services  
3410 Transmitter Rd.  
Panama City, Florida 32404

Permit No. 0050031-013-AV  
Facility ID No. 0050031  
Bay County Waste-to-Energy Facility  
Title V Air Operation Permit Renewal  
Bay County, Florida

*Responsible Official:*  
Glenn Ogborn, Solid Waste Superintendent

**Facility Location:** Bay County Utility Services operates the Bay County Waste-to-Energy Facility, which is located in Bay County at 6510 Bay Line Drive, Panama City, Florida.

**Project:** This is the draft/proposed permit No. 0050031-013-AV for the renewal of the Title V air operation permit No. 0050031-010-AV, and to incorporate the changes authorized by air construction permit No. 0050031-012-AC (PSD-FL-129E), for the existing Bay County Waste-to-Energy Facility. The applicant requested that municipal waste combustor (MWC) Units 1 and 2 be rerated from 245 tons per day (TPD) per unit of municipal solid waste (MSW) to 255 TPD per unit of MSW, which was the original unit capacity. Details of the project are provided in the application and the enclosed Statement of Basis. The permit has been reformatted to reflect the current permit style.

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue a Title V air operation permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at

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## WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

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the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

## WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

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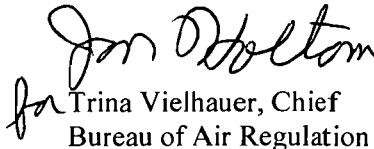
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**EPA Review:** EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that results in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.

  
for Trina Vielhauer, Chief  
Bureau of Air Regulation

**WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

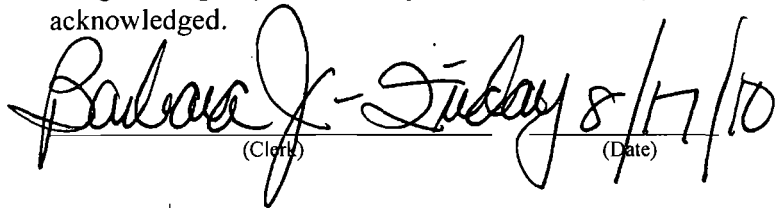
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Title V Air Operation Permit Renewal (including the Public Notice, the Statement of Basis, and the draft/proposed permit), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 8/17/10 to the persons listed below.

Mr. Glenn Ogborn, Solid Waste Superintendent: [gogborn@baycountyfl.gov](mailto:gogborn@baycountyfl.gov)  
Mr. Richard Brookins, Plant Engineer & EH&S Manager: [brookinsr@engenllc.com](mailto:brookinsr@engenllc.com)  
Mr. David A. Buff, PE, Golder Associates: [dbuff@golder.com](mailto:dbuff@golder.com)  
Mr. Rick Bradburn, DEP-NWD: [rick.bradburn@dep.state.fl.us](mailto:rick.bradburn@dep.state.fl.us)  
Ms. Katy Forney, U.S. EPA-Region 4: [forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov)  
Ms. Ana Oquendo, EPA-Region 4: [oquendo.ana@epamail.epa.gov](mailto:oquendo.ana@epamail.epa.gov)  
Ms. Barbara Friday, DEP-BAR: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)  
Ms. Victoria Gibson, DEP-BAR: [victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us) (for reading file)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
(Clerk) 8/17/10 (Date)

## PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

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Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Draft/Proposed Title V Air Operation Permit No. 0050031-013-AV  
Bay County Utility Services Department, Bay County Waste-to-Energy Facility  
Bay County, Florida

**Applicant:** The applicant for this project is Bay County Utility Services, the applicant's responsible official and mailing address are: Glenn Ogborn, Solid Waste Superintendent, Bay County Utility Services Department, Bay County Waste-to-Energy Facility, 3410 Transmitter Road, Panama City, Florida 32404.

**Facility Location:** The applicant operates the existing Bay County Waste-to-Energy Facility, which is located in Bay County at 6510 Bay Line Drive in Panama City, Florida.

**Project:** The applicant applied on February 1, 2010 to the Department for a Title V air operation permit renewal. This is the draft/proposed permit No. 0050031-013-AV for the renewal of the Title V air operation permit, No. 0050031-010-AV, and to incorporate the changes authorized in air construction permit No. 0050031-012-AC (PSD-FL-129E) for the existing Bay County Waste-to-Energy Facility. The applicant requested that municipal waste combustor (MWC) Units 1 and 2 be rerated from 245 tons per day (TPD) per unit of municipal solid waste (MSW) to 255 TPD per unit of MSW (510 TPD for the facility), which were the original unit design capacities. The existing MWC are both coupled to a common steam-electrical generator with a nameplate rating of 15 megawatts (MW) of electricity. Based on the Title V permit application received February 1, 2010, this facility is a major source of hazardous air pollutants (HAP). The permit has been reformatted to reflect the current style.

**Permitting Authority:** Applications for Title V air operation permits for facilities are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213, of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed Title V air operation permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue a Title V air operation permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final Title V air operation permit in accordance with the conditions of the draft/proposed Title V air operation permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-day period. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient

(Public Notice to be Published in the Newspaper)



## PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

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action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed Title V air operation permit, the Permitting Authority shall revise the draft/proposed Title V air operation permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

**EPA Review:** EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no

## PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

# **Bay County Utility Services**

## **Bay County Waste-to-Energy Facility**

Facility ID No. 0050031

Bay County

**Title V Air Operation Permit Renewal**

**Draft/Proposed Permit No. 0050031-013-AV**

(Renewal of Title V Air Operation Permit No. 0050031-010-AV)



**Permitting Authority:**

State of Florida  
Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
Title V Section  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400  
Telephone: (850) 488-0114  
Fax: (850) 921-9533

**Compliance Authority:**

Department of Environmental Protection  
Northwest District Office  
160 Governmental Center, Suite 308  
Pensacola, Florida 32502-5794  
Telephone: (850) 595-8300  
Fax: (850) 595-8096

# Title V Air Operation Permit Renewal

Draft/Proposed Permit No. 0050031-013-AV

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## ***DRAFT/PROPOSED PERMIT***

### **PERMITTEE:**

Bay County Utility Services  
3410 Transmitter Rd.  
Panama City, Florida 32404

Permit No. 0050031-013-AV  
Bay County Waste-to-Energy Facility  
Facility ID No. 0050031  
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit for the above referenced facility. The existing Bay County Waste-to-Energy Facility is located at 6510 Bay Line Drive, Panama City, Florida, in Bay County, and is operated by EnGen, LCC. UTM Coordinates are: Zone 16, 642.40 km East and 3349.50 km North; Latitude is: 30° 15' 54" North, and Longitude is: 85° 30' 8" West.

This permit reflects the new capacity of the municipal waste combustors (authorized by permit No. 0050031-012-AC (PSD-FL-129E)), as well as the revised pollutant limitations that went into effect on April 28, 2009 in 40 C.F.R. 60, Subpart Cb.

The Title V 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, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: *(day 55)*  
Renewal Application Due Date: *(Exp. date – 225 days)*  
Expiration Date: *(Day 55 + 5 years)*

*(Draft/Proposed)*

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Joseph Kahn, Director  
Division of Air Resource Management

JK/tlv/jkh/yha

**SECTION I. FACILITY INFORMATION.**

**Subsection A. Facility Description.**

Bay County Waste-to-Energy Facility began commercial operation on May 1, 1987. It converts a maximum of 510 tons per day (TPD) of non-recycled solid waste into saleable energy. The facility includes two municipal waste combustors (MWC) that are both coupled to a common steam-electrical generator with a nameplate rating of 15 megawatts. The following control equipment is installed and operating: baghouse system; spray dryer absorber system including two lime slakers and a lime silo; and an activated carbon injection system with silo. Particulate matter emissions are controlled by the baghouse system. Mercury, other metals and dioxins/furans are controlled by the activated carbon injection with removal by the baghouse system. Sulfur dioxide, hydrochloric acid, sulfuric acid mist and fluoride emissions are controlled by the spray dryer absorber with lime slurry injection and baghouse collection. The facility has two identical stacks identified as MWC Unit 1 North and MWC Unit 2 South and each are 141 feet high with a 5 feet exit diameter.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

**Subsection B. Summary of Emissions Units.**

EU No.	Brief Description
001	Municipal Waste Combustion Unit No. 1 (North)
002	Municipal Waste Combustion Unit No. 2 (South)

**Subsection C. Applicable Regulations.**

Based on the Title V Air Operation Renewal application received February 1, 2010, this facility is a major source of hazardous air pollutants (HAP). Because this facility operates a stationary diesel-fired fire/safety pump reciprocating internal combustion engine manufactured in 2009, it is subject to regulation under 40 CFR 63, Subpart ZZZZ - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines and 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (see Appendix Ice). The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<b><i>Federal Rule Citations</i></b>	
40 CFR 60, Subpart A, NSPS General Provisions	001 & 002
40 CFR 60, Subpart Cb, Standards of Performance for Large Municipal Waste Combustors.	
40 CFR 60, Subpart Eb, Standards of Performance for Large Municipal Waste Combustors.	
<b><i>State Rule Citations</i></b>	
Rule 62-204, F.A.C., Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference.	001 & 002
Rule 62-210, F.A.C., Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms.	
Rule 62-296, F.A.C., Emission Limiting Standards.	
Rule 62-297, F.A.C., Stationary Sources - Emissions Monitoring.	

## SECTION II. FACILITY-WIDE CONDITIONS.

### The following conditions apply facility-wide to all emission units and activities:

**FW1. Appendices.** The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

### **Emissions and Controls**

**FW2. Not federally enforceable. Objectionable Odor Prohibited.** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

**FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.** The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

*{Permitting Note: Nothing is deemed necessary and ordered at this time.}*

**FW4. General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

**FW5. 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. *Paved and Unpaved Roads.* Trucks delivering MSW, trucks removing ash, passenger vehicles, and other plant equipment use only paved roads at the facility. To minimize emissions from the paved roadways, a road sweeper shall be utilized to clean the areas twice per month.
- b. *Residue Handling.* The residual material (ash) remaining after the solid waste is combusted shall be loaded via conveyor into trucks and hauled to the landfill. The ash shall be handled wet in order to minimize emissions. All ash shall be combined inside the boiler building and sent to the quench tank where it shall be submerged in water. A drag conveyor shall lift the material from the quench tank up an incline to allow standing water to drain. The material shall be then discharged into an Ash Building and then loaded into a truck or roll-off container. The trucks or roll-off containers shall be covered before they exit the site.

[Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in Title V air operation permit renewal application received February 1,2010.]

### **Annual Reports and Fees**

See Appendix RR, Facility-wide Reporting Requirements for additional details.

**FW6. Annual Operating Report.** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1<sup>st</sup> of each year. [Rule 62-210.370(3), F.A.C.]

**FW7. Annual Emissions Fee Form and Fee.** The annual Title V emissions fees are due (postmarked) by March 1<sup>st</sup> of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for

**SECTION II. FACILITY-WIDE CONDITIONS.**

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download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>. [Rule 62-213.205, F.A.C.]

- FW8. Annual Statement of Compliance.** The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]
- FW9. Prevention of Accidental Releases (Section 112(r) of CAA).** If, and when, the facility becomes subject to 112(r), the permittee shall:
- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
  - b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C. [40 CFR 68]



**SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.**

**Subsection A. Emissions Units 001 & 002**

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
-001	Municipal Waste Combustion Unit No. 1 (North)
-002	Municipal Waste Combustion Unit No. 2 (South)

These two Municipal Waste Combustors (MWC) emission units are mass burn rotary waterwall technology and identical in configuration with a maximum individual charging rate of 255 tons per day (TPD) per unit of municipal solid waste (MSW) at heating value of 4,500 Btu/lb (a total of 510 TPD for the facility, equivalent to 68,000 lb/hr steam per unit). The manufacturer is O'Connor Combustor. Both units are coupled to a common electric generator with a nameplate rating of 15 megawatts (MW) of electricity. The facility has two identical stacks identified as MWC Unit 1 North and MWC Unit 2 South. Each stack is 141 feet high with an exit diameter of 5 feet. The emissions units' initial startup date was May 1, 1987. Permit No. 0050031-012-AC (PSD-FL-129E) was issued on July 22, 2010 to authorize the installation of new fan blades on the units. Upon completion of installation of the new blades, the daily capacity of the units will be raised from 245 to 255 tons per day per unit. The permitted authority to perform this work and to increase the charging rate subjected these units to the requirements of 40 CFR 60, Subparts Cb and Eb - Standards of Performance for Large Municipal Waste Combustors.

To comply with the NSPS at 40 CFR 60, Subpart Cb, an Air Pollution Control (APC) System is in operation and consists of the following: a baghouse system; a spray dryer absorber system, including two slakers and a lime silo to make lime slurry; and, an activated carbon injection system with silo. Particulate matter emissions are controlled by the baghouse system. Mercury, other metals and dioxins/furans are controlled by the activated carbon injection with removal by the baghouse system. Sulfur dioxide, hydrochloric acid, sulfuric acid mist and fluoride emissions are controlled by the spray dryer absorber with lime slurry injection and baghouse collection. To minimize odors at the facility, a negative pressure is maintained on the tipping floor and air from within the building is used as combustion air for the units.

The Air Pollution Control (APC) System consists of two (2) identical trains, one for each operating boiler. Each train consists of a spray dryer absorber (SDA), three bag house inlet thermocouples, a five cell bag house, an induced draft (ID) fan, CEMS, and stack. One APC is identified as Unit #1 and the other is Unit #2. Both trains are supplied by several common systems which include the Lime, Scrubber Water, and Carbon Feed Systems. Electrical power is supplied to the APC equipment from the APC motor control center (MCC) building which houses MCC-1B and 2B, the bag house and Macawber system control panels, ID fan frequency drives, and the communication hub for the Ovation Control System. The CEMS Multi-gas Analyzers for each unit are housed in the CEMS Building located between the two stacks.

The APC System is comprised of four subsystems: Lime/slurry, Spray Dryer Absorber (SDA), Fabric Filter (baghouse), and carbon injection. These systems perform the following functions:

Lime System. The lime system prepares lime slurry for use in the SO<sub>2</sub> and HCL neutralization process in a sufficient quantity and concentration to maintain continuous flue gas treatment in the SDA. The system has been designed for batch mixing to provide this service.

Spray Dryer Absorber (SDA). Untreated flue gas and reagent lime slurry combine in the SDA, resulting in the neutralization and removal of the acid components contained in the gas stream. The two streams, lime slurry and boiler exhaust gas, combine, and result in a dry product and scrubbed gas exiting the absorber chamber.

Fabric Filter Baghouse. The bag house is used to remove entrained particulate matter (fly ash, acid gas reaction products, calcium salts, etc.) from the flue gas prior to exhausting to the atmosphere. The particulate matter is filtered from the flue gas as it passes through the fiberglass filter bags. In addition, some un-reacted lime accumulates on the filter bags where the lime provides additional acid gas removal.

## SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

### Subsection A. Emissions Units 001 & 002

**Carbon Injection.** Carbon is injected in the flue gas stream at the inlet of the SDA for the removal of mercury. The system utilizes a loss of weight feeder to inject dry carbon into the inlet duct of the SDA.

*{Permitting Note: These emissions units are regulated under NSPS-40 CFR 60, Subpart Eb, Standards of Performance for Incinerators, adopted and incorporated by reference in Rule 62-204.800(7)5., F.A.C.; Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD)(Permit No. PSD-FL-129); and, Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination.}*

**A.1. Federal Requirements.** In addition to the requirements listed below, these emissions units are also subject to all of the applicable terms and conditions contained in the following attached appendices:

- (a) Appendix NSPS A, 40 CFR 60, Subpart A - General Provisions.
- (b) Appendix NSPS, 40 CFR 60, Subpart Cb - Standards of Performance for Large Municipal Waste Combustors.
- (c) Appendix NSPS, 40 CFR 60, Subpart Eb - Standards of Performance for Large Municipal Waste Combustors.

[Rule 62-213.440, F.A.C.]

#### **Essential Potential to Emit (PTE) Parameters**

**A.2. Permitted Capacity.** The maximum allowable charging rates for the units are as follows:

(a) *Prior to Installation of New Fan Blades.* The maximum charging rate of each of the two MWC's shall not exceed 245 tons of municipal solid waste (MSW) per day (a total of 490 tons per day for the facility). The maximum heat input rate shall not exceed 91.875 MMBtu per hour, assuming a heating value of 4,500 Btu per pound. Steam flow rate shall not exceed an average of 65,333 lbs/hr over any 24-hour rolling average period for each unit. Steam flow shall not exceed an average of 66,667 lbs/hr over any 4-hour block arithmetic averaging period for each unit. A seven-day average, as of 8 a.m., Monday, shall be maintained as a weekly record. To determine compliance with the maximum charging capacity, the steam flow meter shall be calibrated, maintained, and operated to measure steam flow in pounds per hour on a continuous basis, and record the output of the monitor. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, PSD-FL-129D]

(b) *After Installation of New Fan Blades.* Before operating at the following rerated capacity, new fan blades shall be installed in each unit to achieve the higher throughput rate (see Specific Conditions A.43. and A.47.). The maximum charging rate of each municipal waste combustor (MWC) shall not exceed 255 tons of municipal solid waste (MSW) per day per unit, which is equivalent to a maximum heat input rate for each MWC of 96 MMBtu per hour assuming a heating value of 4,500 Btu per pound of waste. The 24-hour rolling average steam flow rate from each unit shall not exceed 68,000 lb/hour. Except as specified in paragraphs (b)(1) and (b)(2) of 40 CFR 53b(b), each unit shall operate at a steam flow rate of no more than 110% of the "maximum demonstrated municipal waste combustor unit load", which is defined in 40 CFR 60.51b as the highest 4-hour arithmetic average municipal waste combustor unit load achieved during four consecutive hours during the most recent dioxin/furan performance test demonstrating compliance with the applicable limit for municipal waste combustor organics specified under 40 CFR 60.52b(c). To determine compliance with the steam flow rates, a steam flow meter shall be calibrated, maintained and operated to measure steam flow in pounds per hour on a continuous basis and record the output of the monitor. Steam flow shall be calculated and recorded in 4-hour block and 24-hour rolling averages. [0050031-012-AC (PSD-FL-129E); Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and 40 CFR 60.31b, 60.34b and 60.38b]

**A.3. Emissions Unit Operating Rate Limitation After Testing.** See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

**A.4. Methods of Operation - Fuels.**

- a. *Allowable Fuels.*

**SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.**

**Subsection A. Emissions Units 001 & 002**

- (1) The only fuels allowed to be burned in the MWC are municipal solid waste and wood waste, with natural gas as an auxiliary fuel. Other wastes shall not be burned without written prior approval from the Department. The wood waste utilization rate shall not exceed 160 tons per day for the facility. Wood waste shall be used when sufficient MSW is not available to maintain a steady heat rate.
  - (2) The primary fuel for the facility is municipal solid waste (MSW), including the items and materials that fit within the definition of MSW contained in either 40 CFR 60.51b or Section 403.706(5), Florida Statutes (1995).
- b. *Unauthorized Fuels.* Subject to the limitations contained in this permit, the authorized fuels for the facility also include the other solid wastes that are not MSW which are described below:
- (1) shall not burn:
    - (a) those materials that are prohibited by state or federal law;
    - (b) those materials that are prohibited by this permit;
    - (c) lead acid batteries;
    - (d) hazardous waste;
    - (e) nuclear waste;
    - (f) radioactive waste;
    - (g) sewage sludge;
    - (h) explosives;
    - (i) beryllium-containing waste, as defined in 40 CFR 61, Subpart C.
  - (2) and shall not knowingly burn:
    - (a) untreated biomedical waste from biomedical waste generators regulated pursuant to Chapter 64E-16, F.A.C., and from other similar generators (or sources). See the attached Appendix BW: Biomedical Waste Definitions, for definitions of what constitutes biomedical waste;
    - (b) segregated loads of biological waste.
- c. *Fuel Handling.* The fuel may be received either as a mixture or as a single-item stream (segregated load) of discarded materials. If the facility intends to use an authorized fuel that is segregated non-MSW material, the fuel shall be either:
- (1) well mixed with MSW on the tipping floor; or
  - (2) alternately charged with MSW in the hopper.
- The facility operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received and used as fuel at the facility, and subject to a percentage weight limitation, below (see Specific Conditions A.4.e., A.4.f. and A.44.). For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of waste material, as determined by visual observation.
- d. *Other Solid Waste.* Subject to the conditions and limitations contained in this permit, the following other solid waste may be used as fuel at the facility:
- (1) Confidential, proprietary or special documents (including but not limited to business records, lottery tickets, event tickets, coupons and microfilm);
  - (2) Contraband which is being destroyed at the request of appropriately authorized local, state or federal governmental agencies, provided that such material is not an explosive, a propellant, a hazardous waste, or otherwise prohibited at the facility. For the purposes of this section, contraband includes but is not limited to drugs, narcotics, fruits, vegetables, plants, counterfeit money, and counterfeit consumer goods;
  - (3) Wood pallets, clean wood, and land clearing debris;
  - (4) Packaging materials and containers;
  - (5) Clothing, natural and synthetic fibers, fabric remnants, and similar debris, including but not limited to aprons and gloves; or
  - (6) Rugs, carpets, and floor coverings, but not asbestos-containing materials or polyethylene or polyurethane vinyl floor coverings.

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Units 001 & 002

- e. *Waste Tires.* Subject to the conditions and limitations contained in this permit, waste tires may be used as fuel at the facility. The total quantity of waste tires received as segregated loads and burned at the facility shall not exceed 3%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined by using a rolling 30-day average.
- f. *Non-MSW Material.* Subject to the conditions and limitations contained in this permit, the following other solid waste materials may be used as fuel at the facility (i.e., the following are authorized fuels that are non-MSW material). The total quantity of the following non-MSW material received as segregated loads and burned at the facility shall not exceed 5%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined by using a rolling 30-day average.
- (1) Construction and demolition debris.
  - (2) Oil spill debris from aquatic, coastal, estuarine or river environments. Such items or materials include but are not limited to rags, wipes, and absorbents.
  - (3) Items suitable for human, plant or domesticated animal use, consumption or application where the item's shelf-life has expired or the generator wishes to remove the items from the market. Such items or materials include but are not limited to off-specification or expired consumer products, pharmaceuticals, medications, health and personal care products, cosmetics, foodstuffs, nutritional supplements, returned goods, and controlled substances.
  - (4) Consumer-packaged products intended for human or domesticated animal use or application but not consumption. Such items or materials include but are not limited to carpet cleaners, household or bathroom cleaners, polishes, waxes and detergents.
  - (5) Waste materials that:
    - (a) are generated in the manufacture of items in categories (c) or (d), above and are functionally or commercially useless (expired, rejected or spent); or
    - (b) are not yet formed or packaged for commercial distribution. Such items or materials must be substantially similar to other items or materials routinely found in MSW.
  - (6) Waste materials that contain oil from:
    - (a) the routine cleanup of industrial or commercial establishments and machinery; or
    - (b) spills of virgin or used petroleum products. Such items or materials include but are not limited to rags, wipes, and absorbents.
  - (7) Used oil and used oil filters. Used oil containing a polychlorinated biphenyls (PCB) concentration equal or greater than 50 ppm shall not be burned, pursuant to the limitations of 40 CFR 761.20(e).
  - (8) Waste materials generated by manufacturing, industrial or agricultural activities, provided that these items or materials are substantially similar to items or materials that are found routinely in MSW, subject to prior approval of the Department.

[Rules 62-4.070(3), 62-213.410 and 62-213.440, F.A.C.; PSD-FL-129; and, 0050031-006-AC]

- A.5. Auxiliary Fuel Burners (one burner in each Combustion Boiler Unit).** This burner device (one burner in each combustor/boiler unit) shall be used at startup during the introduction of MSW fuel until design furnace gas temperature is achieved. The burner shall be fueled only with natural gas. If the annual capacity value for natural gas is greater than 10%, as determined by 40 CFR 60.43b(e), the facility shall be subject to 40 CFR 60.44b, Standards for Nitrogen Oxides. [Rules 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C.; and, PSD-FL-129 and 0050031-006-AC]
- A.6. Operating Temperature.** The furnace mean temperature at the fully mixed zones of the combustors shall not be less than 1,800° F. This corresponds to a minimum flue gas temperature of 673° F, as determined from a March 7, 1991 testing and modeling report. [Rules 62-4.070(3), 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C.; and, PSD-FL-129]
- A.7. Hours of Operation.** These emissions units may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C. and Permit No. 0050031-006-AC]

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Units 001 & 002

##### Emission Limitations and Standards

*{Permitting Note: The emissions standards apply to each municipal waste combustor unit. The equivalent mass emission rates are based on an estimated exhaust flow rate 29,221 dry standard cubic feet per minute corrected to 7% oxygen. The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}*

Unless otherwise specified, the averaging times for Specific Conditions A.8. – A.21. are based on the specified averaging time of the applicable test method.

- A.8. Visible Emissions (VE).** As determined by the continuous opacity monitoring system (COMS) or EPA Method 9, the emission limit for opacity exhibited by the gases discharged to the atmosphere from each unit is 10 percent (6-minute average). [0050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(1)(iii) and Rule 62-204.800(9)(b), F.A.C.]
- A.9. Particulate Matter (PM).** As determined by EPA Method 5, the emission limit for PM contained in the gases discharged to the atmosphere from each unit is 25 milligrams per dry standard cubic meter, corrected to 7% oxygen (O<sub>2</sub>), based on the average of three test runs (equivalent to a mass emission rate of 2.74 lb/hour). [0050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(a)(1)(i) and Rule 62-204.800(9)(b), F.A.C.]
- A.10. Sulfur Dioxide (SO<sub>2</sub>).** As determined by the continuous emissions monitoring system (CEMS), the emission limit for SO<sub>2</sub> contained in the gases discharged to the atmosphere from each unit is 29 parts per million by volume or 25% of the potential SO<sub>2</sub> emission concentration (75% reduction by weight or volume), corrected to 7% O<sub>2</sub> (dry basis), whichever is less stringent (equivalent to a mass emission rate of 8.44 lb/hour). Compliance with this emission limit is based on a 24-hour daily geometric mean. [0050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(b)(3)(i) and Rule 62-204.800(9)(b), F.A.C.]
- A.11. Nitrogen Oxide (NO<sub>x</sub>).** As determined by the CEMS, the emission limit for NO<sub>x</sub> contained in the gases discharged to the atmosphere from each unit is 170 parts per million by volume, corrected to 7% O<sub>2</sub> (dry basis), 24-hour daily average (equivalent to a mass emission rate of 35.57 lb/hour). [0050031-012-AC (PSD-FL-129E); 0050031-011-AC (PSD-FL-129D); and Rule 62-204.800(9)(b), F.A.C.]
- {Permitting Note: The above NO<sub>x</sub> emission limit was established under air construction permit No. 0050031-011-AC (PSD-FL-129D). For that project, each unit was derated to 245 tons of MSW per day and became subject to NSPS Subpart BBBB, 40 CFR 60. This limit is more stringent than the NO<sub>x</sub> limit specified in NSPS Subpart Cb 1 (210 parts per million by volume, corrected to 7% O<sub>2</sub>). Therefore, each unit remains subject to the current NO<sub>x</sub> emissions limit established under air construction Permit No. 0050031-011-AC (PSD-FL-129D).}*
- A.12. Carbon Monoxide (CO).** As determined by the CEMS, the emission limit for CO contained in the gases discharged to the atmosphere from each unit is 250 parts per million by volume, corrected to 7% O<sub>2</sub> (dry basis), 24-hour block average (equivalent to a mass emission rate of 31.83 lb/hour). [0050031-012-AC (PSD-FL-129E); 40 CFR 60.34b(a), Table 3, Mass Burn Rotary Waterwall; and Rule 62-204.800(9)(b), F.A.C.]
- A.13. Volatile Organic Compounds (VOC).** As determined by EPA Method 25 or 25A, the emission limit for VOC contained in the gases discharged to the atmosphere from each unit shall not exceed a mass emission rate of 7.1 lb/hour. [0050031-011-AC (PSD-FL-129D) and Rule 62-204.800(9)(b), F.A.C.]
- A.14. Fluoride (Fl).** As determined by EPA Method 13B, the emission limit for Fl contained in the gases discharged to the atmosphere from each unit shall not exceed a mass emission rate of 0.15 lb/hour. [0050031-011-AC (PSD-FL-129D) and Rule 62-204.800(9)(b), F.A.C.]
- A.15. Cadmium (Cd).** As determined by EPA Method 29, the emission limit for Cd contained in the gases discharged to the atmosphere from each unit is 35 micrograms per dry standard cubic meter, corrected to 7% O<sub>2</sub>, based on the average of three test runs (equivalent to a mass emission rate of 0.00383 lb/hour). [050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(a)(2)(i) and Rule 62-204.800(9)(b), F.A.C.]

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Units 001 & 002

- A.16. Mercury (Hg).** As determined by EPA Method 29, the emission limit for Hg contained in the gases discharged to the atmosphere from each unit is 50 micrograms per dry standard cubic meter or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7% O<sub>2</sub>, whichever is less stringent and based on the average of three test runs (equivalent to a mass emission rate of 0.00547 lb/hour). [0050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(a)(3) and Rule 62-204.800(9)(b), F.A.C.]
- A.17. Lead (Pb).** As determined by EPA Method 29, the emission limit for Pb contained in the gases discharged to the atmosphere from each unit is 400 micrograms per dry standard cubic meter, corrected to 7% oxygen, based on the average of three test runs (equivalent to a mass emission rate of 0.0438 lb/hour). [0050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(a)(4) and Rule 62-204.800(9)(b), F.A.C.]
- A.18. Hydrogen Chloride (HCl).** As determined by EPA Method 26 or 26A, the emission limit for HCl contained in the gases discharged to the atmosphere from each unit is 29 parts per million by volume or 5% of the potential HCl emission concentration (95% reduction by weight or volume), corrected to 7% O<sub>2</sub> (dry basis), whichever is less stringent (equivalent to a mass emission rate of 4.81 lb/hour). [0050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(b)(3)(ii) and Rule 62-204.800(9)(b), F.A.C.]
- A.19. Dioxin/Furan (D/F).** As determined by EPA Method 23, the emission limit for D/F contained in the gases discharged to the atmosphere from each unit is 30 nanograms per dry standard cubic meter (total mass), corrected to 7% O<sub>2</sub> (equivalent to a mass emission rate of  $3.28 \times 10^{-6}$  lb/hour). [0050031-012-AC (PSD-FL-129E); 40 CFR 60.33b(c)(1)(iii) and Rule 62-204.800(9)(b), F.A.C.]
- A.20. Sulfuric Acid Mist (SAM).** As determined by EPA Method 8 or 8C, the emission limit for SAM contained in the gases discharged to the atmosphere from each unit shall not exceed a mass emission rate of 1.5 lb/hour. [0050031-011-AC (PSD-FL-129D) and Rule 62-204.800(9)(b), F.A.C.]
- A.21. Fugitive Ash Emissions.** Fugitive ash emissions from each MWC shall be at least as protective as those requirements listed in 40 CFR 60.55b of NSPS Subpart Eb. [0050031-012-AC (PSD-FL-129E) and 40 CFR 60.36b]

#### Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

- A.22. Excess Emissions Allowed.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
- A.23. Excess Emissions Prohibited.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

#### Compliance With NSPS Standards and Maintenance Requirements

- A.24. NSPS Compliance Requirements.** Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined in accordance with performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard. [40 CFR 60.11(a)]
- A.25. Compliance With NSPS Opacity Standards.** Compliance with opacity standards in 40 CFR 60 shall be determined by conducting observations in accordance with Reference Method 9 in Appendix A of 40 CFR 60, any alternative method that is approved by the Administrator, or as provided in 40 CFR 60.11(e)(5). See Specific Condition **A.28**. [40 CFR 60.11(b)]

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Units 001 & 002

- A.26. NSPS Opacity Requirements.** The opacity standards set forth in 40 CFR 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [40 CFR 60.11(c)]
- A.27. NSPS Operating and Maintenance Procedures.** At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]
- A.28. NSPS COMS Data.** The owner or operator of an affected facility subject to an opacity standard may submit, for compliance purposes, continuous opacity monitoring system (COMS) data results produced during any performance test required under 40 CFR 60.8 in lieu of EPA Method 9 observation data. If an owner or operator elects to submit COMS data for compliance with the opacity standard, he or she shall notify the Administrator of that decision, in writing, at least 30 days before any performance test required under 40 CFR 60.8 is conducted. Once the owner or operator of an affected facility has notified the Administrator to that effect, the COMS data results will be used to determine opacity compliance during subsequent tests required under 40 CFR 60.8 until the owner or operator notifies the Administrator, in writing, to the contrary. For the purpose of determining compliance with the opacity standard during a performance test required under 40 CFR 60.8 using COMS data, the minimum total time of COMS data collection shall be averages of all 6-minute continuous periods within the duration of the mass emission performance test. Results of the COMS opacity determinations shall be submitted along with the results of the performance test required under 60.8. The owner or operator of an affected facility using a COMS for compliance purposes is responsible for demonstrating that the COMS meets the requirements specified in 40 CFR 60.13(c), that the COMS has been properly maintained and operated, and that the resulting data have not been altered in any way. If COMS data results are submitted for compliance with the opacity standard for a period of time during which EPA Method 9 data indicates noncompliance, the EPA Method 9 data will be used to determine opacity compliance. [40 CFR 60.11(e)(5)]
- A.29. NSPS Startup, Shutdown and Malfunction Provisions.** The standards under 40 CFR 60, Subpart Cb, as incorporated in Rule 62-204.800(8)(b), F.A.C., apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, or malfunction periods are limited to 3 hours per occurrence, except as provided in 40 CFR 60.58b(a)(1)(iii). During periods of startup, shutdown, or malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7).
- a. The startup period commences when the affected facility begins the continuous burning of municipal solid waste and does not include any warm-up period when the affected facility is combusting fossil fuel or other non-municipal solid waste fuel, and no municipal solid waste is being fed to the combustor.
  - b. Continuous burning is the continuous, semi-continuous, or batch feeding of municipal solid waste for purposes of waste disposal, energy production, or providing heat to the combustion system in preparation for waste disposal or energy production. The use of municipal solid waste solely to provide thermal protection of the grate or hearth during the startup period when municipal solid waste is not being fed to the grate is not considered to be continuous burning.
  - c. For the purpose of compliance with the carbon monoxide emission limits in 40 CFR 60.53b(a), if a loss of boiler water level control ( e.g., boiler waterwall tube failure) or a loss of combustion air control ( e.g., loss of combustion air fan, induced draft fan, combustion grate bar failure) is determined to be a malfunction, the duration of the malfunction period is limited to 15 hours per occurrence. During such periods of malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7).
- [40 CFR 60.38b and 40 CFR 60.58b(a)]

## SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

### Subsection A. Emissions Units 001 & 002

#### Monitoring of Operations

- A.30. Steam Flow Meter.** To determine compliance with the steam flow rates in Specific Condition **A.2.**, a steam flow meter shall be calibrated, maintained and operated to measure steam flow in pounds per hour on a continuous basis and record the output of the monitor. Steam flow shall be calculated and recorded in 4-hour block and 24-hour rolling averages. [Permit No. 0050031-012-AC (PSD-FL-129E); Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 40 CFR 60.31b, 60.34b and 60.38b]
- A.31. Monitoring Devices.** Devices shall be maintained to continuously monitor and record steam production, furnace exit gas temperature (FEGT) and flue gas temperature at the exit of the control equipment. An FEGT to combustion zone correlation shall be established to relate furnace temperature at the temperature monitor location to furnace temperature in the overfire air fully mixed zone. [PSD-FL-129]
- A.32. Operating Capacity Range.** The furnace heat load shall be maintained between 80% and 100% of the design rated capacity during normal operations. The lower limit may be extended provided compliance with the carbon monoxide emissions limit and the FEGT within this permit at the extended turndown rate are achieved. [PSD-FL-129]

#### Continuous Monitoring Requirements

- A.33. Continuous Emissions Monitoring Systems Required.** For these emissions units, the permittee shall calibrate, operate and maintain continuous emissions monitoring systems (CEMS) for monitoring opacity, sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>) and carbon dioxide (CO<sub>2</sub>). [Rule 62-296.405(1)(f)1., F.A.C. and 0050031-012-AC (PSD-FL-129E)]
- A.34. CEMS Operation and Calibration Requirements.** The CEMS required in Specific Condition **A.34.** shall be operated in accordance with the following requirements:
- In the event of a replacement of a major component of a CEM, a performance specification test, in accordance with 40 CFR 60, Appendix B, shall be conducted within 60 days of such replacement.
  - CEMs data shall be recorded during periods of startup, shutdown, and malfunction, but shall be excluded from emissions averaging calculations for carbon monoxide and opacity.
  - A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.
  - The procedures under 40 CFR 60.13 shall be followed for evaluation and operation of all CEMs.
  - Opacity monitoring system data shall be reduced to 6-minute averages, based on 36 or more data points, and gaseous CEMs data shall be reduced to 1-hour averages, based on 4 or more data points, in accordance with 40 CFR 60.13(h).
  - Carbon monoxide emissions, corrected to 7% oxygen, shall be recorded. A wet oxygen monitor may be used for carbon monoxide emission correction. A wet oxygen reading shall be corrected to a dry basis using a moisture correction determined annually using EPA Method 4. A carbon monoxide value of 400 ppmvd shall indicate good combustion.
  - For purposes of reports required under this permit, excess emissions are defined as any calculated average emission concentration which exceeds the applicable emission limits in Specific Conditions **A.8.** through **A.21.**
  - Quality Assurance Procedures of 40 CFR 60 Appendix F applicable to these CEMs shall be adhered to. These shall include, but not be limited to:
    - Calibration Drift Assessment.** The permittee shall keep all required records, and make them available for Department inspection. The permittee shall report as soon as possible by telephone any instances of Out-of-Control Periods due to calibration drift criteria.



**SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.**

**Subsection A. Emissions Units 001 & 002**

- (2) *Data Accuracy Assessment.* The permittee shall keep all required records, and make them available for Department inspection. The permittee shall report as soon as possible by telephone any instances of Out-of-Control Periods due to excessive inaccuracy.
- (3) *Reporting Requirements.* The permittee shall submit a Data Assessment Report for each quarterly audit on each CEM.

[PSD-FL-129]

**Test Methods and Procedures**

*{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}*

**A.35. Test Methods.** Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1 - 4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5 or 17	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM <sub>10</sub> .)
6, 6C, 8 or 8C	Determination of Sulfur Dioxide Emissions from Stationary Sources
7, 7A, 7B, 7C, 7D or 7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
12 or 29	Determination of Inorganic Lead Emissions from Stationary Sources
13A or 13B	Determination of Total Fluoride Emissions from Stationary Sources
23	Determination of Dioxin/Furan Emissions From Stationary Sources
25 or 25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)
26 or 26A	Determination of Hydrogen Chloride Emissions From Stationary Sources
29	Determination of Metals Emission from Stationary Sources (Mercury, Cadmium, Lead)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [40 CFR 60.54(b)(2); Rule 62-297.401, F.A.C.; PSD-FL-129; and 0050031-012-AC (PSD-FL-129E)]

**A.36. Common Testing Requirements.** Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

**A.37. Annual Compliance Tests Required.** Annual testing (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests in each 5-year calendar period) shall be conducted on each EU to demonstrate compliance with the emissions standards for VE (except as provided in Specific Condition **A.28.**), PM, Cd, D/F, Pb and Hg. Annual testing (no more than 12 calendar months following the previous performance test) shall also be conducted on each EU to demonstrate compliance with the emissions standards for HCl.

**SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.**

**Subsection A. Emissions Units 001 & 002**

- a. Performance testing methods shall be as listed in 40 CFR 60.58b of 40 CFR 60, Subpart Eb, as applicable, and paragraph b., below (see also Appendix NSPS, 40 CFR 60, Subpart Cb, Standards of Performance for Large Municipal Waste Combustors and Appendix NSPS, 40 CFR 60, Subpart Eb, Standards of Performance for Large Municipal Waste Combustors).
- b. The alternative performance testing schedule for dioxins/furans specified in 40 CFR 60.58b(g)(5)(iii) of 40 CFR 60, Subpart Eb, as applicable, is allowed for those designated facilities that achieve a dioxin/furan emission level less than or equal to 15 nanograms per dry standard cubic meter total mass, corrected to 7 percent oxygen.

[Rules 62-210.200(Definitions), 62-210.370(3) and 62-297.310(7), F.A.C.; 40 CFR 60.38b; and, 0050031-012-AC (PSD-FL-129E)]

**A.38. Compliance Tests Prior To Renewal.** Compliance tests shall be performed for FI, VOC and SAM once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions **A.8. - A.21.** [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

**A.39. CEMS Annual Emissions Requirement.** The owner or operator shall use data from the NO<sub>x</sub>, SO<sub>2</sub> and CO CEMS when calculating annual emissions for purposes of computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for purposes of computing emissions pursuant to the reporting requirements of Rule 62-210.370(3), F.A.C., Annual Operating Report. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of each emissions unit. [Rules 62-210.200(Definitions); and 62-210.370(3), F.A.C. and 0050031-012-AC (PSD-FL-129E)]

**Recordkeeping and Reporting Requirements**

**A.40. Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

<b>Report</b>	<b>Reporting Deadline</b>	<b>Related Condition(s)</b>
Actual Emissions Reports	Annually	<b>A.42.</b>
Completion of Construction	As specified	<b>A.43.</b>

[Rule 62-210.370, 62-212.300(1)(e) & 62-213.440, F.A.C.; and, F.A.C. 0050031-012-AC (PSD-FL-129E)]

**A.41. Other Reporting Requirements.** See Appendices RR: Facility-Wide Reporting Requirements, Appendix NSPS Cb: 40 CFR 60, Subpart Cb - Standards of Performance for Large Municipal Waste Combustors and NSPS Eb: 40 CFR 60, Subpart Eb - Standards of Performance for Large Municipal Waste Combustors, for additional reporting requirements. [Rule 62-213.440, F.A.C.]

**A.42. Actual Emissions Reporting.** This permit is based on an analysis that compared projected actual emissions with baseline actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. For the first ten years after completing the authorized work on Units 1 and 2, the permittee shall submit an annual report. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370; F.A.C.
- b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 10-year period setting out each unit's annual emissions during the calendar year that preceded submission

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## SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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### Subsection A. Emissions Units 001 & 002

of the report. The report shall contain the following:

- (1) The name, address and telephone number of the owner or operator of the major stationary source;
- (2) The annual emissions as calculated pursuant to the provisions of Rule 62-210.370, F.A.C.;
- (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and,
- (4) Any other information that the owner or operator wishes to include in the report.

- c. The information required to be documented and maintained pursuant to Rules 62-212.300(1)(e)1. and 2., F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
- d. The permittee shall monitor and report for the following PSD Pollutants: CO, NO<sub>x</sub>, SO<sub>2</sub>, PM/PM<sub>10</sub>, Pb, Hg, D/F and municipal waste combustor acid gases (measured as SO<sub>2</sub> and HCl). See Specific Condition **TV.31** for emissions computation and reporting requirements.  
[0050031-012-AC (PSD-FL-129E); and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

- A.43. Notification of Construction and Completion of Construction.** The permittee shall notify the Permitting and Compliance Authorities upon starting of construction for each unit. After completion of construction, the P.E. of Record shall submit a report detailing the changes made during construction to achieve the rerating of each unit. Installation of the new fan blades is required prior to operating at the higher throughput rate. [Rule 62-4.070(3), F.A.C. and 0050031-012-AC (PSD-FL-129E)]

*{Permitting Note: For the above condition, "construction" means the replacement of the existing fan blades with the new fan blades that are required prior to operating at the new capacity conditions listed in Specific Condition A.2.(b).}*

- A.44. Records of Receipt of Non-MSW.** The facility operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received and used as fuel at the facility, and subject to a percentage weight limitation (see Specific Conditions **A.4.e.** and **A.4.f.**). For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of waste material, as determined by visual observation. [Rules 62-4.070(3), 62-213.410 and 62-213.440, F.A.C.]

#### **Operating Practices, Training and Certification**

- A.45. Operating Practices.** Operating practices of each MWC shall be at least as protective as those requirements listed in 40 CFR 60.53(b) and (c) of NSPS Subpart Eb. [40 CFR 60.34b(b) and 0050031-012-AC (PSD-FL-129E)]
- A.46. Operator Training and Certification.** Operator training and certification for the each MWC shall be at least as protective as those requirements listed in 40 CFR 60.54b of NSPS Subpart Eb. Compliance with these requirements shall be in accordance with the schedule specified in 40 CFR 60.39b(c)(4). [40 CFR 60.35b and 0050031-012-AC (PSD-FL-129E)]

#### **Other Requirements**

- A.47. Compliance Plan - Initial Compliance Demonstration.** Pursuant to Specific Condition 15 of Section 3 of permit No. 0050031-012-AC (PSD-FL-129E), following the replacement of the fan blades, initial compliance tests shall be conducted within 60 days after achieving the maximum production rate at which each unit will be operated, but not later than 180 days after the initial startup. In accordance with the test methods specified in this permit, each unit's exhaust stack shall be tested to demonstrate compliance with the emission limits for PM, Cd, D/F, Pb, Hg and HCl. For each test run, CO, SO<sub>2</sub> and NO<sub>x</sub> emissions recorded by the required CEMS and visible emissions recorded by the required COMS shall be reported. The permittee may use the most recent satisfactory stack test if the tests were conducted at 90% of the new permit capacity to meet the initial testing requirement. [40 CFR 60.8; 0050031-012-AC (PSD-FL-129E); and, Rules 62-213.440(2) and 62-297.310(7)(a) and (b), F.A.C.]

## SECTION IV. ATTACHMENTS.

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### The Following Attachments Are Included for Applicant Convenience:

Appendix A: Glossary.

Appendix BW: Biomedical Waste Definitions.

Appendix I: List of Insignificant Emissions Units and/or Activities.

Appendix ICE: Requirements for Internal Combustion Engines.

Appendix NESHAP A: 40 CFR 63, Subpart A - Standardized General Provisions.

Appendix NESHAP ZZZZ: 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Appendix NSPS A: 40 CFR 60, Subpart A - General Provisions.

Appendix NSPS Cb: 40 CFR 60, Subpart Cb - Standards of Performance for Large Municipal Waste Combustors.

Appendix NSPS Eb: 40 CFR 60, Subpart Eb - Standards of Performance for Large Municipal Waste Combustors.

Appendix NSPS IIII: 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

Appendix RR: Facility-wide Reporting Requirements.

Appendix TR: Facility-wide Testing Requirements.

Appendix TV: Title V General Conditions.

## STATEMENT OF BASIS

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### Title V Air Operation Permit Renewal

Permit No. 0050031-013-AV

#### APPLICANT

The applicant for this project is Bay County Utility Services. The applicant's responsible official and mailing address are: Glenn Ogborn, Solid Waste Superintendent, Bay County Utility Services, Bay County Waste-to-Energy Facility, 3410 Transmitter Road, Panama City, Florida 32404.

#### FACILITY DESCRIPTION

The applicant operates the existing Bay County Waste-to-Energy Facility, which is located in Bay County at 6510 Bay Line Drive, Panama City, Florida.

This existing facility consists of two Municipal Waste Combustors (MWC) with a maximum individual charging rate of 255 tons per day (TPD) of Municipal Solid Waste (MSW) at a heating value of 4,500 Btu/lb (a total of 510 TPD for the facility, equivalent to 68,000 lb/hr steam per unit for 24-hour rolling average). The emission units are mass burn rotary waterwall technology and identical in configuration. The manufacturer is O'Connor Combustor. Both units are coupled to a common steam-electrical generator with a nameplate rating of 15 megawatts (MW) of electricity. The facility has two identical stacks identified as MWC Unit 1 North and MWC Unit 2 South and each are 141 feet high with an exit diameter of five feet. The emissions units' initial startup date was May 1, 1987.

To comply with the NSPS at 40 CFR 60, Subpart Cb, the following control equipment has been installed and operating to meet the requirements of the subpart: baghouse system; spray dryer absorber system, including two slakers and a lime silo to make lime slurry; and, activated carbon injection system with silo. Particulate matter emissions are controlled by the baghouse system. Mercury, other metals and dioxins/furans are controlled by the activated carbon injection with removal by the baghouse system. Sulfur dioxide, hydrochloric acid, sulfuric acid mist and fluoride emissions are controlled by the spray dryer absorber with lime slurry injection and baghouse collection.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

#### PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V air operation permit for the above referenced facility and to incorporate the changes authorized in project No. 0050031-012-AC (PSD-FL-129E). Which was issued in response to the applicant's request that MWC Units 1 and 2 be re-rated to the original throughput of 255 tons per day per unit of municipal solid waste. The increased rating reclassified MWC Units 1 and 2 as large municipal waste combustors and subjected them to the regulation pursuant to the NSPS, 40 CFR 60, Subpart Cb, Large Municipal Waste Combustors constructed on or before September 20, 1994.

#### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a combined air construction (AC) permit revision and a Title V air operation permit (AV) renewal received February 1, 2010.

Combined request for additional information sent March 29, 2010.

Combined additional information response received April 26, 2010.

Additional information for the AC project was received May 24, 2010.

Request to issue AC and AV separately received June 7, 2010.

2<sup>nd</sup> request for additional information related to internal combustion engines sent June 17, 2010.

Additional information response received July 2, 2010, application deemed complete.

Draft/proposed Title V permit issued *month DD*, 2010.

Public Notice published *month DD*, 2010.

## STATEMENT OF BASIS

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### **PRIMARY REGULATORY REQUIREMENTS**

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 of the Code of Federal Regulations, Part 60 (40 CFR 60).

CAM: Compliance Assurance Monitoring (CAM) does not apply to the units at the facility because continuous emissions monitors are being used as the continuous compliance determination method for each pollutant which has an add-on control device installed in order to comply with the emissions limit.

NESHAP: The facility operates units subject to the National Emission Standards of Hazardous Air Pollutants (NESHAP) of Title 40 of the Code of Federal Regulations, Part 63 (40 CFR 63).

### **PROJECT REVIEW**

This project is for the renewal of Title V air operation permit, No. 0050031-010-AV, and to incorporate the changes authorized in air construction permit No. 0050031-012-AC (PSD-FL-129E), for the existing Bay County Waste-to-Energy Facility. The applicant requested that MWC Units 1 and 2 be rerated from 245 TPD per unit of MSW to 255 TPD per unit of MSW, which was the original unit capacity. This change reclassified the units from small MWC subject to the NSPS provisions in Subpart BBBB to large MWC subject to the emissions guidelines in Subpart Cb. The rerating requires the installation of new fan blades in each unit to achieve the higher throughput rate and provide increased energy efficiency. The permit has been reformatted to reflect the current permit style.

### **CONCLUSION**

This project renews Title V air operation permit No. 0050031-010-AV, which was effective on August 1, 2005. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.

**REFERENCED ATTACHMENTS.**

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**The Following Attachments Are Included for Applicant Convenience:**

The following attachments are included for convenient reference:

Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).

Table H, Permit Summary.

Table 1, Summary of Air Pollutant Standards and Terms.

Table 2, Summary of Compliance Requirements.

**FIGURE 1**

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE**

[Note: This form is referenced in 40 CFR 60.7, Subpart A-General Provisions]

Pollutant (*Circle One*):    SO<sub>2</sub>                      NO<sub>x</sub>    TRS    H<sub>2</sub>S                      CO                      Opacity

Reporting period dates: From \_\_\_\_\_ to \_\_\_\_\_

Company: \_\_\_\_\_

Emission Limitation: \_\_\_\_\_

Address: \_\_\_\_\_

Monitor Manufacturer: \_\_\_\_\_

Model No.: \_\_\_\_\_

Date of Latest CMS Certification or Audit: \_\_\_\_\_

Process Unit(s) Description: \_\_\_\_\_

Total source operating time in reporting period <sup>1</sup>: \_\_\_\_\_

Emission data summary <sup>1</sup>	CMS performance summary <sup>1</sup>
1. Duration of excess emissions in reporting period due to:	1. CMS downtime in reporting period due to:
a. Startup/shutdown .....	a. Monitor equipment malfunctions .....
b. Control equipment problems .....	b. Non-Monitor equipment malfunctions .....
c. Process problems .....	c. Quality assurance calibration .....
d. Other known causes .....	d. Other known causes .....
e. Unknown causes .....	e. Unknown causes .....
2. Total duration of excess emissions .....	2. Total CMS Downtime .....
3. Total duration of excess emissions x (100) / [Total source operating time] ..... % <sup>2</sup>	3. [Total CMS Downtime] x (100) / [Total source operating time] ..... % <sup>2</sup>

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

*Note: On a separate page, describe any changes since the last in CMS, process or controls.*

I certify that the information contained in this report is true, accurate, and complete.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_



**TABLE H  
PERMIT HISTORY**

**Permit History (for tracking purposes):**

<b>EU ID No.</b>	<b>Description</b>	<b>Permit No.</b>	<b>Effective Date</b>	<b>Expiration Date</b>	<b>Project Type</b>
001	Municipal Waste Combustion Unit No. 1 (North)	PSD-FL-129			Construction (new)
		AC03-145061	10/14/1988	06/01/1989	Construction (mod.)
		AO03-165754	04/13/1990	04/01/1995	Operation
		0050031-002-AV	08/01/2000	08/01/2005	Initial
		0050031-006-AC	05/30/2001	08/01/2005	Construction (mod.)
		0050031-007-AV	09/29/2001	08/01/2005	Revision
		0050031-008-AV	06/25/2003	08/01/2005	Revision
		0050031-010-AV	08/01/2005	07/31/2010	Renewal
		0050031-011-AC	06/13/2005	06/13/2010	Construction (mod.)
		0050031-012-AC		08/01/2011	Construction (mod.)
		0050031-013-AV	08/01/2011	07/31/2015	Renewal
002	Municipal Waste Combustion Unit No. 2 (South)	PSD-FL-129			Construction (new)
		AC03-152196	10/14/1988	06/01/1989	Construction (mod.)
		AO03-165755	04/13/1990	04/01/1995	Operation
		0050031-002-AV	08/01/2000	08/01/2005	Initial
		0050031-006-AC	05/30/2001	08/01/2005	Construction (mod.)
		0050031-007-AV	09/29/2001	08/01/2005	Revision
		0050031-008-AV	06/25/2003	08/01/2005	Revision
		0050031-010-AV	08/01/2005	07/31/2010	Renewal
		0050031-011-AC	06/13/2005	06/13/2010	Construction (mod.)
		0050031-012-AC	07/22/2010	08/01/2011	Construction (mod.)
		0050031-013-AV			Renewal

**TABLE 1**

**SUMMARY OF AIR POLLUTANT STANDARDS AND TERMS**

This table summarizes information related to the emissions standards that apply to each municipal waste combustors unit for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. The equivalent mass emission rates are based on an estimated exhaust flow rate 29,221 dry standard cubic feet per minute corrected to 7% oxygen. This permit reflects the new capacity, of the MWC as well as the revised pollutant limitations that went into effect on April 28, 2009 in 40 C.F.R. 60, Subpart Cb.

E.U. ID No.	Brief Description	Fuel(s)	Hrs/Yr	Pollutant Name	Standard Allowable Emissions	Equivalent Emissions*			Regulatory Citation(s)	See Permit Condition(s)
						lbs/hr Per unit	lbs/hr Both units	TPY Both units		
001 & 002	Municipal Waste Combustion Units, Unit 1(North) and Unit 2(South)	MSW	8,760	VE	Not >10% (6-minute average)			0050031-012-AC	A.8.	
				PM	25 mg/dscm	2.74	5.48	24.00	0050031-012-AC	A.9.
				SO <sub>2</sub>	29 ppmvd	8.44	16.88	73.93	0050031-012-AC	A.10.
				NO <sub>x</sub>	170 ppmvd	35.57	71.14	311.60	0050031-012-AC	A.11.
				CO	250 ppmvd	31.83	63.66	278.83	0050031-012-AC	A.12.
				VOC	30 mg/dscm	7.10	14.20	62.20	PSD-FL-129	A.13.
				Fluoride	30 mg/dscm	0.15	0.30	1.314	PSD-FL-129	A.14.
				Cd	35 mg/dscm	0.00383	7.661x10 <sup>-3</sup>	0.034	0050031-012-AC	A.15.
				Mercury	50 mg/dscm	0.00547	0.011	0.048	0050031-012-AC	A.16.
				Lead	400 mg/dscm	0.0438	0.0846	0.371	0050031-012-AC	A.17.
				HCl	29 ppmvd	4.81	9.62	42.14	0050031-012-AC	A.18.
				D/F	30 nanograms/dscm	3.28x10 <sup>-6</sup>	6.56x10 <sup>-6</sup>	2.87x10 <sup>-5</sup>	0050031-012-AC	A.19.
SAM	App. 4.45% of SO <sub>2</sub>	1.50	3.00	13.14	PSD-FL-129	A.20.				

\* The "Equivalent Emissions" listed are for informational purposes.

**TABLE 2**  
**SUMMARY OF COMPLIANCE REQUIREMENTS**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit

E.U. ID No.	Brief Description	Fuel(s)	Pollutant Name	Emission Monitoring <sup>1</sup>	Emission Control	Compliance Method EPA Method	Testing Time Frequency	Frequency Base Date <sup>2</sup>	Min. Compliance Test Duration	See Permit Condition(s)
001 & 002	Municipal Waste Combustion Units, Unit 1(North) and Unit 2(South)	MSW	VE	COMS*	Baghouse	9	Annual	Sept. 30	COMS or 1 hour	A.24. - A.39.
			PM	Stack Test	Baghouse	5	Annual	Sept. 30	3 hours	
			SO <sub>2</sub>	CEMS*	SDA Scrubber Lime Slurry	6, 6C, or 8	Annual	Sept. 30	Rata or 3 hours	
			NO <sub>x</sub>	CEMS*	Good Combustion	7, 7A,7C,7D, or 7E	Annual	Sept. 30	Rata or 3 hours	
			CO	CEMS*	Good Combustion	10	Annual	Sept. 30	Rata or 3 hours	
			VOC	Stack Test	Good Combustion	25 or 25A	Annual	Sept. 30	3 hours	
			Fluoride	Stack Test	SDA Scrubber Lime Slurry	13A or 13 B	Annual	Sept. 30	3 hours	
			Cadmium	Stack Test	Baghouse	29	Annual	Sept. 30	3 hours	
			Mercury	Stack Test	Carbon Injection	29 or 101A	Annual	Sept. 30	3 hours	
			Lead	Stack Test	Baghouse	12 or 29	Annual	Sept. 30	3 hours	
			HCl	Stack Test	Lime Slurry	26 or 26A	Annual	Sept. 30	3 hours	
			D/F	Stack Test	Carbon Injection	23	Annual	Sept. 30	3 hours	
SAM	Stack Test	SDA Scrubber Lime Slurry	8 or 8C	Annual	Sept. 30	3 hours				

Notes:

<sup>1</sup> CMS [=] continuous monitoring system used for compliance in lieu of stack test if marked '\*'. (Acceptable as long as CMS is maintained and calibrated as required.)

<sup>2</sup> Frequency base date established for planning purposes only; see Rule.62-297.310, F.A.C.

**Friday, Barbara**

---

**From:** Friday, Barbara  
**Sent:** Tuesday, August 17, 2010 1:58 PM  
**To:** 'gogborn@baycountyfl.gov'  
**Cc:** 'brookinsr@engenlc.com'; 'dbuff@golder.com'; Bradburn, Rick;  
'Forney.Kathleen@epamail.epa.gov'; 'Oquendo.Ana@epamail.epa.gov'; Gibson, Victoria;  
Attalla, Yousry  
**Subject:** BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV  
**Attachments:** SignedWrittenNotice0050031-013-AV-DP.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

Attention: Yousry Attalla

Owner/Company Name: BAY COUNTY BOARD OF COUNTY COMMISSIONERS  
Facility Name: BAY COUNTY WASTE-TO-ENERGY FACILITY  
Project Number: 0050031-013-AV  
Permit Status: DRAFT/PROPOSED  
Permit Activity: PERMIT RENEWAL  
Facility County: BAY

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0050031.013.AV.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0050031.013.AV.D_pdf.zip)

“The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the “*Air Permit Documents Search*” website at <http://www.dep.state.fl.us/air/emission/apds/default.asp> .”

Permit project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation.

Barbara Friday  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9524

<b>Recipient</b>	<b>Delivery</b>	<b>Read</b>
'gogborn@baycountyfl.gov'		
'brookinsr@engenlc.com'		
'dbuff@golder.com'		
Bradburn, Rick	Delivered: 8/17/2010 1:58 PM	
'Forney.Kathleen@epamail.epa.gov'		
'Oquendo.Ana@epamail.epa.gov'		
Gibson, Victoria	Delivered: 8/17/2010 1:58 PM	Read: 8/17/2010 2:02 PM
Attalla, Yousry	Delivered: 8/17/2010 1:58 PM	

**Friday, Barbara**

---

**From:** Glenn Ogborn [gogborn@baycountyfl.gov]  
**Sent:** Wednesday, August 18, 2010 10:38 AM  
**To:** Friday, Barbara  
**Subject:** RE: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

The purpose of this email is to affirm that I have been able to access the attached documents

Glenn Ogborn

---

**From:** Friday, Barbara [Barbara.Friday@dep.state.fl.us]  
**Sent:** Tuesday, August 17, 2010 12:58 PM  
**To:** Glenn Ogborn  
**Cc:** brookinsr@engenc.com; dbuff@golder.com; Bradburn, Rick; Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov; Gibson, Victoria; Attalla, Yousry  
**Subject:** BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

Attention: Yousry Attalla

Owner/Company Name: BAY COUNTY BOARD OF COUNTY COMMISSIONERS

Facility Name: BAY COUNTY WASTE-TO-ENERGY FACILITY

Project Number: 0050031-013-AV

Permit Status: DRAFT/PROPOSED

Permit Activity: PERMIT RENEWAL

Facility County: BAY

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0050031.013.AV.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0050031.013.AV.D_pdf.zip)

“The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the “*Air Permit Documents Search*” website at

<http://www.dep.state.fl.us/air/emission/apds/default.asp> . “

Permit project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation.

Barbara Friday  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)

(850)921-9524

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

Please Note: "Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding State or Local business are public records available to the public and media upon request. Your email communications may therefore be subject to public disclosure.

**Friday, Barbara**

---

**From:** postmaster@engenllc.com  
**To:** Richard Brookins  
**Sent:** Tuesday, August 17, 2010 2:06 PM  
**Subject:** Delivered: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

**Your message has been delivered to the following recipients:**

Richard Brookins

Subject: FW: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV



**Friday, Barbara**

---

**From:** Buff, Dave [DBuff@GOLDER.com]  
**To:** Friday, Barbara  
**Sent:** Tuesday, August 17, 2010 2:11 PM  
**Subject:** Read: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

Your message was read on Tuesday, August 17, 2010 2:11:23 PM (GMT-05:00) Eastern Time (US & Canada).

**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** Bradburn, Rick; Gibson, Victoria  
**Sent:** Tuesday, August 17, 2010 1:58 PM  
**Subject:** Delivered: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

**Your message has been delivered to the following recipients:**

Bradburn, Rick

Gibson, Victoria

**Subject:** BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

---

Sent by Microsoft Exchange Server 2007

## Friday, Barbara

---

**From:** Bradburn, Rick  
**To:** Friday, Barbara  
**Sent:** Tuesday, August 17, 2010 2:08 PM  
**Subject:** Read: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

Your message was read on Tuesday, August 17, 2010 2:08:29 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

---

**From:** Gibson, Victoria  
**To:** Friday, Barbara  
**Sent:** Tuesday, August 17, 2010 2:02 PM  
**Subject:** Read: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

Your message was read on Tuesday, August 17, 2010 2:02:21 PM (GMT-05:00) Eastern Time (US & Canada).

**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** Attalla, Yousry  
**Sent:** Tuesday, August 17, 2010 1:58 PM  
**Subject:** Delivered: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

**Your message has been delivered to the following recipients:**

Attalla, Yousry

Subject: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

---

Sent by Microsoft Exchange Server 2007

## Friday, Barbara

---

**From:** Attalla, Yousry  
**To:** Friday, Barbara  
**Sent:** Thursday, August 19, 2010 10:36 AM  
**Subject:** Read: BAY COUNTY WASTE-TO-ENERGY FACILITY; 0050031-013-AV

Your message was read on Thursday, August 19, 2010 10:35:40 AM (GMT-05:00) Eastern Time (US & Canada).