



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR, PESTICIDES & TOXICS MANAGEMENT DIVISION
61 Forsyth St., S.W.
Atlanta, Georgia 30303
Fax Number: 404-562-9019

Electronic Transmission

MEMORANDUM

Date: January 22, 2014

To: Syed Arif
Permitting Section Administrator
Office of Permitting and Compliance
Florida Department of Environmental Protection

From: Ana M. Oquendo, Environmental Engineer
Air Permits Section, Air Planning Branch
U.S. EPA, Region 4

Subject: Comments on the Proposed Initial Title V Permit
Columbia/Winfield Solid Waste Management
Permit No. 0230047-004-AV

cc: Heather Ceron, Air Permit Section Chief, EPA Region 4

Below are the comments from the United States Environmental Protection Agency, Region 4 on the above referenced source. Our comments are divided into two categories: 1. significant comments and 2. general comments. Significant comments are defined as those comments that would trigger an objection under 40 CFR Part 70. EPA's 45-day review period for this permit ends on February 17, 2014.

If you have any questions regarding these comments or need additional information, feel free to contact Ana M. Oquendo at 404-562-9781 or via email to oquendo.ana@epa.gov.

General Comments

1. Section II, Subsection A. Emission Unit 002, Condition A.5

- a. Based on the cited regulations (40 CFR 61.154), the end of Condition A.5.(c) should read

“Use an alternative emissions control method that has received prior written approval by the Administrator *according to procedures described in 61.149(c)(2).*”

- b. The last sentence of the condition, please make the following revision:

“be installed and maintained *as described in 61.154(b)*, or the requirements of (b)(1)”

2. Section II, Subsection A. Emission Unit 002, Condition A.6

- a. Consider deleting the last sentence of the condition since it seems to be a duplicate of the first part of the condition.

~~“Permittee shall submit an application for a construction permit and revision to the Title V permit to the Department within one year if the NMOC annual emission rate is equal to or greater than 50 megagrams per year.”~~

- b. Revise the citation as follows 40 CFR 60.752(b)(2)(i).

3. Section II, Subsection A. Emission Unit 002, Condition A.10

- a. Since the permit uses its own numbering system instead of following that of the regulations, please revise the first paragraph of the condition to read:

“except as provided for in paragraphs (1)(ii) or (3) *(a)(1) or (c)* of this section.”

- b. Also revise the following sentence for clarification purposes:

“(a) The NMOC emission rate report shall contain an annual or five-year estimate of the NMOC emission rate *calculated using the formula and procedures provided in Condition A.7.*”

- c. Consider deleting Condition A.10(a)(1) since it seems to be a duplicate of the first paragraph of Condition A.10.

~~“(1) NMOC emission rate reports shall be submitted annually, except as provided for in the paragraphs (1)(ii) and (3) of this section.”~~

- d. Consider revising the citation for this condition to read 40 CFR 60.757(b) for clarification purposes.

- e. Consider adding 40 CFR 60.743 and 40 CFR 60.755 to the citation for this condition.

4. *Section II, Subsection A. Emission Unit 002, Condition A.11*

- a. Please revise the following sentence so that it reads similar to the regulation.

“The Administrator may request additional information as may be necessary to verify that permanent closure has taken place in accordance to 40 CFR 258.60.”

- b. Consider revising the citation for this condition to read 40 CFR 60.757(d) for clarification purposes.

5. *Section II, Subsection A. Emission Unit 002, Condition A.14*

- a. Consider revising the citation for this condition to read 40 CFR 60.752(d) for clarification purposes.

6. *Section II, Subsection B. Emission Unit 001-Emissions Unit Description*

Please consider adding language regarding the applicability of 40 CFR 60 Subpart AAAA to EU002 Air Curtain Incinerator.

7. *Section II, Subsection B. Emission Unit 001-Citations*

Per 40 CFR 70.6(a)(1)(i), “The permit shall specify and reference the origin of and authority for each term or condition, and identify any difference in form as compared to the applicable requirement upon which the term or condition is based.” The regulations indicate that citation must be to the origin of the requirements contained in the condition. An acceptable citation must include the underlying applicable requirement of the condition (*i.e.*, a preconstruction permit, a rule or regulation and section, or both) in which it is based.

- a. Please revise the citation of the following conditions to include construction permit 0230047-001-AC since it is the underlying applicable requirement where the requirements were originally established.
- i. Conditions B.3, B.6, B.7, B.8, B.9, B.10, and B.22.
- b. The citation to Condition B.11 *Visible Emissions* should include a construction permit, a regulation or a rule. Citing of an operating permit is not acceptable. EPA suggests deleting citation of Permit No. 0230047003-AO and adding citation to Rule 62-296.401(7)(b)1.
- c. Consider adding reference to Rule 62-297.310(8)(b) to the citation in Condition B.16. to support the reporting requirements therein.
- d. Revise the citation in Condition B.19 since 40 CFR 60.145(c) does not seem to exist in the regulations.

e. Daily operating log requirements set forth in Condition B.20 were first described in operating permit 0230047-003-AO. The cited Rule 62-296.401(7)(c)3. serves as the underlying applicable requirement for part of the requirements in the condition (*i.e.*, length for record keeping and availability of records for inspection) but not exactly for the daily log data to be collected by the permittee. Therefore, EPA recommends adding Rule 62-4.070(3) to the citation, which gives the Department authority to “issue any permit with specific conditions necessary to provide reasonable assurance that Department rules can be met.”

f. Revise citation to Condition B.21 to read 40 CFR 60.1455(b), (c), (d), and (h).

8. *Section II, Subsection B. Emission Unit 001, Condition B.7.b.* – Please revise the requirement in Condition B.7.b. for clarity purposes. EPA requests the sentence to read as follows:

“b. Ash shall not be allowed to build up in the pit of the air curtain incinerator to higher than 1/3 of the pit depth...”

9. *Section II, Subsection B. Emission Unit 001, Condition B.12.* - Please revise the following sentence in Condition B.12. for clarity purposes.

“Visible Emissions shall not exceed 35 percent opacity during any 6-minute averaging period during the startup period that is within the first 30 minutes of operation.”

10. *Typographical Errors*

a. Section I, Subsection C – The emission unit numbers subject to Rule 62-213 *Title V Air Operation Permits for Major Sources of Air Pollution*

Regulation	EU No(s)
Rule 62-213, F.A.C. (Title V Air Operation Permits for Major Sources of Air Pollution)	-001, -001 -002