Golder Associates Inc.

6241 NW 23rd Street, Suite 500 Gainesville, FL 32653-1500 Telephone (352) 336-5600 Fax (352) 336-6603

November 6, 2007

Florida Department of Environmental Protection Bureau of Air Regulation Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400



RECEIVED

063-7620

NOV 07 2007

BUREAU OF AIR REGULATION

Attention: Mr. A. A. Linero, P.E., Program Administrator, Permitting South Section

RE: REQUEST TO AMEND TITLE V APPLICATION FOR MIAMI-DADE COUNTY RESOURCE RECOVERY FACILITY

Dear Mr. Linero:

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The Title V Permit for the Miami-Dade County Resource Recovery Facility became effective on May 28, 2007—Permit No. 0250348-007-AV. The permit did not include final action on a request to modify the carbon monoxide (CO) limit to the limit in the most recent revision to 40 CFR 60 Subpart Cb, as Florida's State Implementation Plan (SIP) had not yet been revised to include those changes. Since the issuance of the Title V permit, the SIP has been amended and a construction permit with the new limit was issued to the facility—Permit No. 0250348-008-AC (PSD-FL-006F). On behalf of the owner (Miami-Dade Department of Solid Waste Management), and the Responsible Official (Montenay Power Corporation), Golder Associates Inc. (as the Engineer of Record) is requesting that the changes in Permit No. 0250348-008-AC be incorporated into the Title V permit for the facility, prior to the March 28, 2008, expiration date of the construction permit.

We also request that FDEP incorporate the other changes in the May 2006 version of Subpart Cb into the Title V permit before the March 28, 2008, expiration date, if those changes can be approved by FDEP without additional filings to FDEP. It is our understanding that FDEP can choose to open the permit "for cause", and make the changes without applications from the owner, because the changes must be met by April 2009. If the changes cannot be made by the March 28, 2008, expiration date of the construction permit, we request that FDEP act to modify the Title V permit for the remaining requirements in the May 2006 version of 40 CFR Subpart Cb, before the April 2009 deadline by which the changes must be met.

The form signed by the responsible official and engineer of record requesting modification of the Title V permit to include the new CO limit is enclosed with this letter.

This submittal is being certified by the Responsible Official and a Professional Engineer as required by FDEP rules.

Please let us know if the CO limit changes to the Title V cannot be made by the March 28, 2008, expiration date of the construction permit, or if you have questions regarding this request.

Sincerely,

GOLDER ASSOCIATES INC

David A. Buff, P.E., Q.E.P.

Principal Engineer

0637620\Apps\L102507-620.doc

Enclosure

Cc:

Lee Casey, Dade County DSWM

A. Lue, Montenay

T. Morello, Montenay

C. Schultz, Montenay

C. Tewksbury, Montenay

RECEIVED

NOV 07 2007

BUREAU OF AIR REGULATION

APPLICATION FOR REVISION OF TITLE V AIR OPERATION PERMIT TO INCREASE CARBON MONOXIDE LIMITS MIAMI-DADE COUNTY RESOURCE RECOVERY FACILITY MIAMI, FLORIDA

> Prepared For: Montenay Power Corporation 6990 NW 97th Avenue Miami, Florida 33178

Prepared By:
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida 32653-1500

October 2007

063-7620

DISTRIBUTION:

- 4 Copies FDEP
- 1 Copy Miami-Dade County
- 4 Copies Montenay Power Corporation
- 1 Copy Golder Associates Inc.

AIR PERMIT APPLICATION—LONG FORM



Department of Environmental Protection

Division of Air Resource Management APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) — Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

	Facility Owner/Company Name: Miami-Dade County, Department of Solid Waste nagement
2.	Site Name: Miami-Dade County Resource Recovery Facility
3.	Facility Identification Number: 0250348
4.	Facility Location:
	Street Address or Other Locator: 6990 N.W. 97 th Avenue
	City: Miami County: FL Zip Code: 33178
5.	Relocatable Facility? 6. Existing Title V Permitted Facility?
	\square Yes \boxtimes No \boxtimes Yes \square No
<u>A</u> p	olication Contact
1.	Application Contact Name: Tom Morello
2.	Application Contact Mailing Address
	Organization/Firm: Montenay Power Corporation
	Street Address: 6990 N.W. 97 th Avenue
	City: Miami State: FL Zip Code: 33178
3.	Application Contact Telephone Numbers
	Telephone: (305) 593-7000 ext. Fax: (305) 593-7274
4.	Application Contact Email Address: tom.morello@veoliaes.com
<u>Ap</u>	olication Processing Information (DEP Use)
1.	Date of Receipt of Application: 11-7-17 3. PSD Number (if applicable):
	Project Number(s): 0250348-009-AV4. Siting Number (if applicable):

DEP Form No. 62-210.900(1) – Form Effective: 2/2/06

MDCRR_DB_COLimitRev.doc 10/25/2007

Purpose of Application

This application for air permit is submitted to obtain: (Check one)
Air Construction Permit ☐ Air construction permit. ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL). ☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.
Air Operation Permit ☐ Initial Title V air operation permit. ☐ Title V air operation permit revision. ☐ Title V air operation permit renewal. ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required. ☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.
Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing) ☐ Air construction permit and Title V permit revision, incorporating the proposed project. ☐ Air construction permit and Title V permit renewal, incorporating the proposed project.
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box: I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.
Application Comment The purpose of this application is to revise the Title V permit (No. 0250348-007-AV) to incorporate permit No. 0250348-008-AV, which increases the CO emissions limit applicable to the four RDF combustors.
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Scope of Application

Emissions		Air	Air
Unit ID	Description of Emissions Unit	Permit	Permit
Number	Description of Emissions Unit		
		Type	Proc. Fee
001	RDF Combustor #1		
002	RDF Combustor #2		·
003	RDF Combustor #3		
004	RDF Combustor #4		·
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- · · · · · · · · · · · · · · · · · · ·			,
·	·		

Application Processing Fee

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP. 1. Owner/Authorized Representative Name: 2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: Zip Code: State: 3. Owner/Authorized Representative Telephone Numbers... Telephone: (ext. Fax: 4. Owner/Authorized Representative Email Address: 5. Owner/Authorized Representative Statement: I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Signature Date

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

options, as applicable): ☑ For a corporation, the president, secretary, treasurer, or vice-president of the corpor charge of a principal business function, or any other person who performs similar p decision-making functions for the corporation, or a duly authorized representative is person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit Chapter 62-213, F.A.C. ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respecting for a municipality, county, state, federal, or other public agency, either a principal officer or ranking elected official. ☐ The designated representative at an Acid Rain source. 3. Application Responsible Official Mailing Address Organization/Firm: Montenay Power Corporation Street Address: 6990 N.W. 97th Avenue City: Miami State: FL Zip Code: 33178 4. Application Responsible Official Telephone Numbers Telephone: (305) 593-7000 ext. Fax: (305) 593-7274 5. Application Responsible Official Email Address: tom.morello@veoliaes.com 6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in the permit application. I hereby certify, based on information and belief formed aft reasonable inquiry, that the statements made in this application are true, accurate complete and that, to the best of my knowledge, any estimates of emissions report application are based upon reasonable techniques for calculating emissions. The pollutant emissions units and air pollution control equipment described in this application are based upon reasonable techniques for calculating emissions. The pollutant emissions units and air pollution control equipment described in this application are based upon reasonable techniques for calculating emissions. The pollutant emissions found in the statutes of the State of Florida and true with a permit department of Environmental Protection and revis	1.	Application Responsible Official Name: Tom Morello		
charge of a principal business function, or any other person who performs similar p decision-making functions for the corporation, or a duly authorized representative of person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permic Chapter 62-213, F.A.C. For a partnership or sole proprietorship, a general partner or the proprietor, respecting for a municipality, county, state, federal, or other public agency, either a principal officer or ranking elected official. The designated representative at an Acid Rain source. 3. Application Responsible Official Mailing Address Organization/Firm: Montenay Power Corporation Street Address: 6990 N.W. 97th Avenue City: Miami State: FL Zip Code: 33178 4. Application Responsible Official Telephone Numbers Telephone: (305) 593-7000 ext. Fax: (305) 593-7274 5. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in the permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurately complete and that, to the best of my knowledge, any estimates of emissions reposituation are based upon reasonable techniques for calculating emissions. To pollutant emissions units and air pollution control equipment described in this application are based upon reasonable techniques for calculating emissions. To pollutant emissions found in the statutes of the State of Florida and rules of air pollutant emissions found in the statutes of the State of Florida and rules of air pollutant emissions found in the department, cannot be transferred we authorization from the department, and I will promptly notify the department was department of Environmental Protection and revisions unit. Finally, I certify the facility and each emissions unit are in compliance with all applicable requirements which they	2.			
For a municipality, county, state, federal, or other public agency, either a principal officer or ranking elected official. The designated representative at an Acid Rain source. 3. Application Responsible Official Mailing Address Organization/Firm: Montenay Power Corporation Street Address: 6990 N.W. 97th Avenue City: Miami State: FL Zip Code: 33178 4. Application Responsible Official Telephone Numbers Telephone: (305) 593-7000 ext. Fax: (305) 593-7274 5. Application Responsible Official Email Address: tom.morello@veoliaes.com 6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in the permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate complete and that, to the best of my knowledge, any estimates of emissions report application are based upon reasonable techniques for calculating emissions. The pollutant emissions units and air pollution control equipment described in this awill be operated and maintained so as to comply with all applicable standards of air pollutant emissions found in the statutes of the State of Florida and rules of air pollutant emissions found in the statutes of the State of Florida and rules. Department of Environmental Protection and revisions thereof and all other apprequirements identified in this application to which the Title V source is subject understand that a permit, if granted by the department, cannot be transferred we authorization from the department, and I will promptly notify the department up legal transfer of the facility or any permitted emissions unit. Finally, I certify the facility and each emissions unit are in compliance with all applicable requirement which they are subject, except as identified in compliance plan(s) submitted with application.		manufacturing, production, or operating facilities applying for or subject to a permit under		
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I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this				

DEP Form No. 62-210.900(1) - Form

Effective: 2/2/06

1.	ofessional Engineer Certification Professional Engineer Name: David A. Buff
	Registration Number: 19011
2.	Professional Engineer Mailing Address
	Organization/Firm: Golder Associates Inc.**
	Street Address: 6241 NW 23 rd Street, Suite 500
 	City: Gainesville State: FL Zip Code: 32653
3.	Professional Engineer Telephone Numbers
	Telephone: (352) 336-5600 ext.545 Fax: (352) 336-6603
4.	Professional Engineer Email Address: dbuff@golder.com
	Professional Engineer Statement:
	I, the undersigned, hereby certify, except as particularly noted herein*, that:
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
	(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here \square , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.
	(4) If the purpose of this application is to obtain an air construction permit (check here \square , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here \square , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.
(00) (00)	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the infognation given in the corresponding application for air construction permit and with all provisions contained in such permit.
	10/29/07
P^	Signature Date
9	
. S	(seal) 2 %
TO SOLOT	* Attach any exception to certification statement. *Board of Professional Engineers Certificate of Authorization #00001670
DE	EP Form No. 62-210.900(1) – Form MDCRR DB COLimitRev.doc

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Typ	e
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racinty Location and	<u> </u>			
1. Facility UTM Coor		2. Facility Latitude/Longitude		
Zone East (km) 564.30		Latitude (DD/MM/SS) 25/50/06		
North (km) 2857.40		Longitude (DD/MI	M/SS) 80/21/30	
3. Governmental	4. Facility Status	5. Facility Major	6. Facility SIC(s):	
Facility Code:	Code:	Group SIC Code:	4953	
. 0	Α	49	_	
7. Facility Comment:				
	•			
Facility Contact				
1. Facility Contact N	ame:	· · · · · · · · · · · · · · · · · · ·		
Tom Morello	anne.			
2. Facility Contact M	Iailing Address		- -	
_	: Montenay Power Corpo	oration		
Street Address	: 6990 N.W. 97 th Avenue	·		
City	: Miami State: FL Z	ip Code: 33178		
3. Facility Contact To	elephone Numbers:			
Telephone: (305)	593-7000 ext.	Fax: (305) 593-72	74	
4. Facility Contact E	mail Address: tom.more	llo@veoliaes.com		
Essilia Duine Des				
Facility Primary Resp		ial" is identified in Sec	tion I that is not	
the facility "primary i		iai is identified in Sec	tion 1. that is not	
	sponsible Official Name	.		
1. Tacinty Tinnary ICC	sponsible Official Ivailiv	•		
2. Facility Primary Re	sponsible Official Maili	ng Address		
Organization/Firm:	1			
Street Address:				
City	: St	ate: Zip	Code:	
3. Facility Primary Re	sponsible Official Telep	hone Numbers		
Telephone: ()	- ext.	Fax: ()	-	
4. Facility Primary Re	sponsible Official Emai	l Address:		

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source ☐ Unknown
2. Synthetic Non-Title V Source
3. Title V Source
4. Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)
5. Synthetic Minor Source of Air Pollutants, Other than HAPs
6. Major Source of Hazardous Air Pollutants (HAPs)
7. Synthetic Minor Source of HAPs
8. One or More Emissions Units Subject to NSPS (40 CFR Part 60)
9. One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)
10. One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)
11. Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))
12. Facility Regulatory Classifications Comment:

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
СО	A .	N
Dioxin/Furan	В	N
Fluorides	В	N
Arsenic (H015)	В	N
Beryllium (H021)	В	N
Cadmium (H027)	В	N
Dibenzofurans (H058)	В	N
Hydrogen Chloride (H106)	A	N
Mercury (H114)	В	N
Dioxins (H165)	В	N
Total HAPs	A	N
NO _x	Α .	N
Lead	В	N
РМ	A	N
PM ₁₀	A	N
Sulfuric Acid Mist	В	N
SO ₂	A	N
VOC	В	Y

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
voc				100	Avoid PSD
		_			
			_		
					٠
				•	
			,		

7.	Facility-Wide or Multi-Unit Emissions Cap Comment:
	Cap imposed by PSD-FL-006(D).

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date: April 2005
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date: April 2005
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date: April 2005
A	Iditional Requirements for Air Construction Permit Applications
_	Area Map Showing Facility Location:
	☐ Attached, Document ID: ☐ Not Applicable (existing permitted facility)
2.	
3.	Rule Applicability Analysis: Attached, Document ID:
4.	List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility)
5.	Fugitive Emissions Identification: Attached, Document ID: Not Applicable
6.	Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document.ID: Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.): Attached, Document ID: Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): Attached, Document ID: Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.):
10	. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):

Additional Requirements for FESOP Applications

1.	List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):						
	☐ Attached, Document ID: ☐ Not Applicable (no exempt units at facility)						
<u>A</u> 0	Additional Requirements for Title V Air Operation Permit Applications						
1.	List of Insignificant Activities (Required for initial/renewal applications only):						
	☐ Attached, Document ID: ⊠ Not Applicable (revision application)						
2.	Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): Attached, Document ID:						
	 ✓ Not Applicable (revision application with no change in applicable requirements) 						
	Compliance Report and Plan (Required for all initial/revision/renewal applications): \[\textstyle \text{ Attached, Document ID: \textbf{DCRR-FI-CV3}} \] Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.						
4.	List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):						
	☐ Attached, Document ID:						
	☐ Equipment/Activities On site but Not Required to be Individually Listed						
	Not Applicable ■						
5.	Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only):						
	☐ Attached, Document ID: ⊠ Not Applicable						
6.	Requested Changes to Current Title V Air Operation Permit:						
<u>A</u> 0	lditional Requirements Comment						
Inc	corporate changes to CO limits from permit No. 0250348-008-AC into the Title V permit.						
	·						

DCCR-FI-CV3 COMPLIANCE REPORT AND PLAN

ATTACHMENT DCRR-FI-CV3

COMPLIANCE REPORT AND PLAN

Montenay Power Corporation certifies that the Miami-Dade County Resource Recovery Facility, as of the date of this application, is in compliance with each applicable requirement addressed in this Title V air permit revision application.

I, the undersigned, am the responsible official as defined in Chapter 62-213, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Compliance statements for this facility will be submitted on an annual basis to FDEP, before March 1st of each year.

Signature, Responsible Official

EMISSIONS UNIT INFORMATION Section [1] RDF Combustor No. 1

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application — Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION Section [1] RDF Combustor No. 1

POLLUTANT DETAIL INFORMATION
Page [1] of [3]
Carbon Monoxide (CO)

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Pollutant Emitted: CO	2. Total Percent Effi	ciency of Control:		
3. Potential Emissions: 769 lb/hour 267.5	_	nthetically Limited? Yes ⊠ No		
		1 es No		
5. Range of Estimated Fugitive Emissions (as to tons/year	applicable):			
6. Emission Factor: 2,000 ppmvd @ 7% O _{2,} 1-h	nr	7. Emissions Method Code:		
Reference: Historical Data		0		
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-mon From: To:	th Period:		
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monito ☐ 5 years ☐	oring Period: 10 years		
10. Calculation of Emissions: See Table DCRR-EU1-F1.10. Annual emissions based on 200 ppmvd @ 7% O ₂ and 70,106 dscfm @ 7% O ₂				
11. Potential Fugitive and Actual Emissions Co	mment:			

EMISSIONS UNIT INFORMATION

Section [1] RDF Combustor No. 1

POLLUTANT DETAIL INFORMATION Page [1] of [3]

CO

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1.	Basis for Allowable Emissions Code: RULE	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units: 250 ppmvd @ 7% O ₂ , 24-hr geometric mean	4.	Equivalent Allowable Emissions: 87.5 lb/hour tons/year
5.	Method of Compliance: CEMS for CO		
	Allowable Emissions Comment (Description 40 CFR 60.34b and permit No. 0250348-008-Act O ₂		
Al	lowable Emissions Allowable Emissions 2 o	f 2	
1.	Basis for Allowable Emissions Code: OTHER	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units: 200 ppmvd @ 7% O ₂ , annual average	4.	Equivalent Allowable Emissions: 61.1 lb/hour 267.7 tons/year
5.	Method of Compliance: CEMS for CO		
6.	Allowable Emissions Comment (Description Permit No. 0250348-008-AC/PSD-FL-006F. En		
<u>Al</u>	lowable Emissions Allowable Emissions	c	f
1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissions: lb/hour tons/year
5.	Method of Compliance:		
6.	Allowable Emissions Comment (Description	of (Operating Method):

October 2007 063-7620

ATTACHMENT DCRR-EU1-F1.10 MAXIMUM CO EMISSION RATES FOR THE BOILER UNITS, MIAMI-DADE COUNTY RESOURCE RECOVERY

			Maximum Emission Rate per Unit				Total Annual Emission Rate	
Emission Factor (at 7% O ₂)	Basis of Emission Factor	References	Maximum 1-hr ^a (lb/hr)	Maximum 8-hr ^a (lb/hr)	Maximum 24-hr ^b (lb/hr)	Annual (TPY) ^c	For All Four Units	
2,000 ppmvd, 1-hr	Historical Data	1	7 69			N/A	N/A	
550 ppmvd, 8-hr	Historical Data	1		212		N/A	N/A	
250 ppmvd, 24-hr	40 CFR 60, Subpart Cb	2			87.5	N/A	N/A	
200 ppmvd, annual	Permit Limit	3			61.1	267.7	1,070.9	

Notes:

lb/hr = pounds per hour.

ppmvd = parts per million by volume dry.

TPY = tons per year.

References:

- 1. Based on analysis of historical CO CEMS data from Unit #2.
- 2. Emission limit per 40 CFR 60, Subpart Cb (revised May 10, 2006).
- 3. Limit based on permit No. 0250348-008-AC/PSD-FL-006F.

Footnotes:

- ^a Based on a steam rate of 198,000 lb/hr, with a corresponding flue gas flow rate of 88,250 dscfm at 7% oxygen (2,499 dscm/min).
- b Based on a steam rate of 180,000 lb/hr, with a corresponding flue gas flow rate of 80,250 dscfm at 7% oxygen (2,273 dscm/min).
- ^c Based on flue gas flow rate of 70,106 dscfm at 7% oxygen, and 8,760 hr/yr operation.

Calculations:

To calculate emissions with an emission factor (EF) in terms of ppmvd:

 $lb/hr = (EF(ppmvd) \times MW \times flow rate(dscf/min) \times 2,116.8 lb/ft^2 \times 60(min/hr))/(1,545 ft-lb/flb_m-{}^{\circ}R \times 528{}^{\circ}R \times 1E6)$

EMISSIONS UNIT INFORMATION Section [2] RDF Combustor No. 2

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application — Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION Section [2] RDF Combustor No. 2

POLLUTANT DETAIL INFORMATION
Page [1] of [3]
Carbon Monoxide (CO)

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: CO	2. Total Percent Effi	ciency of Control:
3. Potential Emissions:	4. Sy	nthetically Limited?
769 lb/hour 267 .3	7 tons/year	Yes No
5. Range of Estimated Fugitive Emissions (as	applicable):	
to tons/year		
6. Emission Factor: 2,000 ppmvd @ 7% O ₂ , 1-h Reference: Historical Data	nr	7. Emissions Method Code: 0
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-mon From: To:	th Period:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monito ☐ 5 years ☐	oring Period: 10 years
10. Calculation of Emissions: See Table DCRR-EU1-F1.10. Annual emission dscfm @ 7% O ₂	ons based on 200 ppmv	d @ 7% O₂ and 70,106
11. Potential Fugitive and Actual Emissions Co	mment:	

POLLUTANT DETAIL INFORMATION Page [1] of [3] CO

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions	Allowable Emissions 1 of 2

1.	Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units: 250 ppmvd @ 7% O ₂ , 24-hr geometric mean	4. Equivalent Allowable Emissions: 87.5 lb/hour tons/year
5.	Method of Compliance: CEMS for CO	
	Allowable Emissions Comment (Description 40 CFR 60.34b and permit No. 0250348-008-A O ₂ , annual average	
<u>Al</u>	lowable Emissions Allowable Emissions 2 o	of <u>2</u>
1.	Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units: 200 ppmvd @ 7% O ₂ , annual average	4. Equivalent Allowable Emissions: 61.1 lb/hour 267.7 tons/year
5.	Method of Compliance: CEMS for CO	
6.	Allowable Emissions Comment (Description Permit No. 0250348-008-AC/PSD-FL-006F. En	
<u>Al</u>	lowable Emissions Allowable Emissions	of
1.	Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3.	Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5.	Method of Compliance:	
6.	Allowable Emissions Comment (Description	n of Operating Method):

EMISSIONS UNIT INFORMATION Section [3] RDF Combustor No. 3

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

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Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION Section [3] RDF Combustor No. 3

POLLUTANT DETAIL INFORMATION
Page [1] of [3]
Carbon Monoxide (CO)

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: CO	2. Total Percent Efficie	ency of Control:		
3. Potential Emissions: 769 lb/hour 267.	4. Synth	netically Limited? es ⊠ No		
5. Range of Estimated Fugitive Emissions (as to tons/year	applicable):			
6. Emission Factor: 2,000 ppmvd @ 7% O _{2,} 1-h Reference: Historical Data	nr	7. Emissions Method Code: 0		
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month From: To:	Period:		
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitori ☐ 5 years ☐ 10	ng Period:) years		
10. Calculation of Emissions: See Table DCRR-EU1-F1.10. Annual emissions based on 200 ppmvd @ 7% O ₂ and 70,106 dscfm @ 7% O ₂				
11. Potential Fugitive and Actual Emissions Co	mment:			

EMISSIONS UNIT INFORMATION

Section [3] RDF Combustor No. 3

POLLUTANT DETAIL INFORMATION

Page

[1] of

[3] CO

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions 1 of 2

1.	Basis for Allowable Emissions Code: RULE	2.	Future Effective Date of Allowable Emissions:			
3.	Allowable Emissions and Units: 250 ppmvd @ 7% O ₂ , 24-hr geometric mean	4.	Equivalent Allowable Emissions: 87.5 lb/hour tons/year			
5.	Method of Compliance: CEMS for CO					
	Allowable Emissions Comment (Description 40 CFR 60.34b and permit No. 0250348-008-A					
Al	lowable Emissions Allowable Emissions 2 o	f <u>2</u>				
1.	Basis for Allowable Emissions Code: OTHER	2.	Future Effective Date of Allowable Emissions:			
3.	Allowable Emissions and Units: 200 ppmvd @ 7% O ₂ , annual average	4.	Equivalent Allowable Emissions: 61.1 lb/hour 267.7 tons/year			
5.	Method of Compliance: CEMS for CO					
6.	Allowable Emissions Comment (Description Permit No. 0250348-008-AC/PSD-FL-006F. En					
<u>Al</u>	lowable Emissions Allowable Emissions	o	of			
1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allowable Emissions:			
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissions: lb/hour tons/year			
5.	Method of Compliance:					
6.	6. Allowable Emissions Comment (Description of Operating Method):					

EMISSIONS UNIT INFORMATION Section [4] RDF Combustor No. 4

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

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Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application — Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION Section [4] RDF Combustor No. 4

POLLUTANT DETAIL INFORMATION
Page [1] of [3]
Carbon Monoxide (CO)

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Pollutant Emitted: CO	2. Total Perc	ent Efficie	ency of Control:		
3. Potential Emissions:		4. Synth	netically Limited?		
769 lb/hour 267	7 tons/year	□ Ye	es 🛭 No		
5. Range of Estimated Fugitive Emissions (as	applicable):				
to tons/year					
6. Emission Factor: 2,000 ppmvd @ 7% O _{2,} 1-h	nr		7. Emissions		
D. C			Method Code:		
Reference: Historical Data			0		
8.a. Baseline Actual Emissions (if required):	8.b. Baseline		Period:		
tons/year	From:	Го:			
9.a. Projected Actual Emissions (if required):	9.b. Projected	Monitori	ng Period:		
tons/year		ırs 🗌 10) years		
,					
10. Calculation of Emissions:					
See Table DCRR-EU1-F1.10. Annual emission	ons based on 20	0 ppmvd (⑦ 7% O₂ and 70,106		
dscfm @ 7% O ₂			- ,		
·					
11. Potential Fugitive and Actual Emissions Comment:					

POLLUTANT DETAIL INFORMATION Page [1] of [3] CO

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions	Allowable Emissions 1 o	of 2
----------------------------	-------------------------	------

1.	Basis for Allowable Emissions Code: RULE	2.	Future Effective Date of Allow Emissions:	able
3.	Allowable Emissions and Units: 250 ppmvd @ 7% O ₂ , 24-hr geometric mean	4.	Equivalent Allowable Emission 87.5 lb/hour	ns: tons/year
5.	Method of Compliance: CEMS for CO	,		
	Allowable Emissions Comment (Description 40 CFR 60.34b and permit No. 0250348-008-A			cfm @
<u>All</u>	lowable Emissions Allowable Emissions 2 o	f 2		
1.	Basis for Allowable Emissions Code: OTHER	2.	Future Effective Date of Allow Emissions:	able
3.	Allowable Emissions and Units: 200 ppmvd @ 7% O ₂ , annual average	4.	Equivalent Allowable Emission 61.1 lb/hour 267.7	ns: tons/year
5.	Method of Compliance: CEMS for CO			
6.	Allowable Emissions Comment (Description Permit No. 0250348-008-AC/PSD-FL-006F. En			% O ₂
All	lowable Emissions Allowable Emissions	c	of	
1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of Allow Emissions:	able
3.	Allowable Emissions and Units:	4.	Equivalent Allowable Emissional lb/hour	ns: tons/year
5.	Method of Compliance:			
6.	Allowable Emissions Comment (Description	of (Operating Method):	