From: O"Rourke, Richard M. (WASD)
To: Cascio, Tom
Cc: Arif, Syed
Subject: RE: Draft Permit
Date: Tuesday, January 22, 2013 10:33:19 AM

Hello and thank you, Tom,

I have gone through the earlier draft that was sent last week and had no serious concerns. I think that I need a little more information on the additional reporting requirements for clarification.

13. Monitoring, Reporting and Recordkeeping Requirements: To demonstrate that the actual annual emissions are equal to or less than the projected actual emissions of CO (125.81 tons/year), NOx (81.47 tons/year), SO2 (70.49 tons/year), PM10/PM.2..5 (2.16 tons/year), and VOC (43.05 tons/year) for the 1.2 MW Digester Gas Electric Cogenerators (EUs 007, 009, 021, 022), the permittee shall do the following:
1. The permittee shall monitor the pollutant emissions; 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 5 years following resumption of regular operations. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.
2. The permittee shall report to the Department within 60 days after the end of each year during which records must be generated under subparagraph 62-212.300(1)(e)1., F.A.C., setting out the units annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
a. The name, address and telephone number of the owner or operator of the major stationary source;
b. The annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.;
c. If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
d. Any other information that the owner or operator wishes to include in the report.
3. Reporting of any actual emissions levels that results in a significant increase of any pollutant as described in the Technical Evaluation and Preliminary Determination document for this project shall require that the permittee submit a PSD air construction permit application to address the pollution increase.
4. The information required to be documented and maintained pursuant to subparagraphs 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.
[Rule 62-212.300 F.A.C.]

I guess my question(s) is (are) simple. From the wording, it does not appear that annual emissions testing of all the pollutants listed, CO, NOx, SO2, PM10/PM 2.5, and VOC, is as annual requirement; but rather WASD can continue to report annual emissions from these units using the most reliable information available. Which for the emission units to be installed (EUs 021, 022), will include the information obtained from the CO, NOx, and VOC testing for demonstration of compliance with subpart ZZZZ. So I would like to confirm that we can continue to calculate and determine our annual emissions using the most reliable information on equipment unit operation and emission factors, consistent with the determination of historic baseline emissions. Another comment or question is that since

the baseline and projected emissions of PM10/PM 2.5 are so negligible, compared to PSD threshold, is there a reason to mention at all. Also, is the reporting in condition 13.2. in addition to the regular facilities annual air operating report or EAOR?

Other than noted above. Looks good. Thank you for time and assistance.

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From: Cascio, Tom [mailto:Tom.Cascio@dep.state.fl.us]
Sent: Tuesday, January 22, 2013 9:56 AM
To: O'Rourke, Richard M. (WASD)
Cc: Arif, Syed
Subject: Draft Permit

Hi Richard – we added a few conditions dealing with reporting (yellow highlight).

Tom Cascio, D.B.A., CPM, Sigma Xi
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Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.