



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

September 14, 1999

Mr. Dwight Daughtrey
Daughtrey Construction, Inc.
6816 SW C.R. 769
Arcadia, FL 33821

Dear Mr. Daughtrey:

Re: Application dated 08/30/99
Reference Permit No. 0270013-001-AC
DEP File No. 0270013-003-AO

On August 31, 1999, the Department received your air pollution application to operate an air curtain incinerator. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Permit 0270013-001-AC shows your company name as "Dwight Daughtrey Construction, Inc." Letterhead on previous correspondence from you shows the company name as "Daughtrey Construction, Inc." This application shows your company name as "Daughtrey Construction." Which company name is correct?
2. Permit 0270013-001-AC states the air curtain incinerator is an Air Burners, Inc., Model T-359, but your application (page 6) states a Waukesha Pit Burner Machine was construction. Is the application correct?
3. Rule 62-296.401(7)(d), F.A.C., states the width of the pit shall not exceed 12 feet. Permit 0270013-001-AC states the width of the pit is 10 feet and the length is 35 feet. Your application states the pit's is 16 feet 1 inch wide and 40 feet long. Explain this difference.
4. Permit 0270013-001-AC allows a maximum of 4.5 ton/hr. of material to be charged to the air curtain incinerator. Your application was completed based on a maximum charging rate of 2.5 tons/hr. Are you requesting this lower rate as a permit condition? If no, re-submit the affected pages of the application.

Page 1 of 2

"Protect, Conserve and Manage Florida's Environment and Natural Resources"


Printed on recycled paper.

5. Permit 0270013-001-AC allows the maximum operating (charging) hours of the incinerator to be 1,088 hours/year. Your application requests the operating (charging) hours to be 176 hours/year. Are you requesting this lower rate as a permit condition? If no, re-submit the affected pages of the application.
6. Is it correct that the pit is not refractory lined? Thus, charging must stop 2 hours before sunset as referenced in your Operation and Maintenance Guide and in accordance with Rule 62-296.401(7)(h), F.A.C.
7. Do you have any comments regarding the attached working draft permit?

NOTE - Rule 62-4.050, F.A.C. requires applications of this type must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Therefore, your response to the above requests should be certified by a professional engineer.

Your response should be submitted by October 29, 1999. If you have any questions, please call me at (813)744-6100 extension 106.

Sincerely,



James L. McDonald
Air Permitting Engineer

Attachment

cc: Mr. Thomas Siegert
Project Director
South Florida Environmental Services
6821 Vista Parkway North
West Palm Beach, FL 33411



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

PERMITTEE:
Daughtrey Construction, Inc.
6816 SW C.R. 769
Arcadia, FL 33821

Permit No.: 0270013-003-AO
County: DeSoto
Effective Date:
Expiration Date: 10/02/04
Project: Air Curtain
Incinerator

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204 through 62-297 & 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of a Waukesha air curtain incinerator with a 10' wide x 11' deep x 35' long clay strata burning pit. The incinerator has a maximum charging rate of 4.5 tons/hr. of wood waste (trees, logs, large brush, stumps relatively free of soil, unbagged leaves and yard trash, tree surgeon debris, and clean dry lumber such as pallets). Emissions are controlled by forced air at a very high static pressure over and around the pit. Power to the fan is supplied by a diesel engine. The air flow (air curtain) is delivered to the burning pit by a 35' air manifold. Fires will be started only with virgin oil natural gas, or liquefied petroleum gas.

Location: Approximately 2 miles north of the intersection of C.R. 769 and C.R. 761, southwest of Arcadia

UTM: 17-402.0 km East 3001.2 km North

Facility ID: 1010371 Emission Unit ID: 001

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Replaces Permit No.: 0270013-001-AC (AC14-244330)

PERMITTEE:
Daughtrey Construction, Inc.

PERMIT No.: 0270013-003-AO
PROJECT: Air Curtain
Incinerator

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions. [Rule 62-4.160, F.A.C.]
2. The maximum charging rate to the incinerator shall not exceed 4.5 tons/hr. (daily average). [Construction permit 0270013-001-AC]
3. The operating (charging) hours of this incinerator shall exceed 1,088 hours/yr. [Construction permit 0270013-001-AC]
4. Outside of start-up periods, no visible emissions (5% opacity) shall be allowed except that visible emissions up to 20% opacity will be allowed for up to three minutes in any one hour. [Rule 62-296.401(7)(a), F.A.C.]
5. During the start-up periods, which shall not exceed the first thirty (30) minutes of operation, an opacity of up to 35 percent, averaged over a six minute period, shall be allowed. [Rule 62-296.401(7)(b), F.A.C.]
6. The general excess emissions rule, Rule 62-210.700, F.A.C., to handle start-ups, shutdowns, and malfunctions, shall not apply to this air curtain incinerator. [Rule 62-296.401(7)(c), F.A.C.]
7. The only materials that can be burned are wood waste consisting of trees, logs, large brush, stumps relatively free of soil, unbagged leaves and yard trash, tree surgeon debris, and clean dry lumber such as pallets. [Rule 62-296.401(7)(e), F.A.C.]
8. The burning of sawdust, paper, trash, tires, garbage, plastics, liquid wastes, chemically treated or painted wood, and other similar materials is expressly prohibited. [Rule 62-296.401(7)(f), F.A.C.]
9. Only virgin oil, natural gas, or liquefied petroleum gas may be used to start the fire. The use of waste oil, chemicals, gasoline or tires is prohibited. [Rule 62-296.401(7)(g), F.A.C.]
10. In no case shall the air curtain incinerator be started before sunrise and all charging must be completely stopped 2 hours before sunset. [Rule 62-296.401(7)(h), F.A.C.]
11. The pit shall be no longer than the length of the air curtain incinerator manifold. [Rule 62-296.401(7)(d), F.A.C.]

PERMITTEE:
Daughtrey Construction, Inc.

PERMIT No.: 0270013-003-AO
PROJECT: Air Curtain
Incinerator

12. The incinerator must be located at least three hundred (300) feet from any pre-existing occupied building located off site. [Rule 62-296.401(7)(j), F.A.C.]

13. Air curtain incinerators used at landfills may not be operated within 1000 feet of any active portion of the landfill unless the air curtain incinerator is separated from the active portion of the landfill by a controlled gate or check-in station [Rule 62-296.401(7)(k), F.A.C.].

14. The material shall not be loaded into the air curtain incinerator such that it will protrude above the air curtain. [Rule 62-296.401(7)(l), F.A.C.]

15. Ash shall not be allowed to build up in the pit to higher than 1/3 the pit depth or to the point where the ash begins to impede combustion, whichever occurs first. [Rule 62-296.401(7)(m), F.A.C.]

16. A detailed operation and maintenance (O & M) guide must be available to the operators at all times and the permittee must provide the proper training to all operators before they work at the incinerator. [Rule 62-296.401(7)(n), F.A.C.]

17. Each trained operator will receive a certificate demonstrating that the operator has successfully passed the training required by the O & M guide. A copy of this certificate will be kept on file at the facility and be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

18. This facility shall not cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

19. A daily operating log shall be kept and at a minimum contain the following:

- A. Date
- B. Type of starter fuel used.
- C. Total charges.
- D. Total material (in tons) charged.
- E. Daily operating (charging) hours which includes the start of initial combustion to the time of last charging the incinerator (Start and Stop Times).
- F. At the end of each month provide a calendar year cumulative total for the hours of operation to ensure the 1,088 hrs./yr. limitation is not exceeded.

PERMITTEE:
Daughtrey Construction, Inc.

PERMIT No.: 0270013-003-AO
PROJECT: Air Curtain
Incinerator

- G Daily, calculate the average hourly charging rate (tons/hr.).
- H. Type of Maintenance Performed
- I. Comments
- J. Operator's signature

The log shall be maintained at the facility for at least 3 years and shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]

20. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. These provisions are applicable to any source, including, but not limited to vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include the following:

- Ash removed from the pit shall be wetted with water as necessary.
- Water will be applied as necessary to the facility grounds.
- Reasonable care will be taken in loading and unloading the pit.

[Rule 62-296.310(4)(c), F.A.C.]

21. In order to ensure the visible emission limitations are not exceeded and objectionable odors are not generated, the air curtain incinerator's fan shall continue to operate after the last charge of each day until all combustion has ceased. For the purposes of this condition, "combustion" means the presence of any flames or smoke that causes a visible emission greater than 5% opacity. [Rule 62-4.070(3), F.A.C.]

22. Test the air curtain incinerator for visible emissions annually at least 60 days prior to or on the day of June 25. Submit a copy of the test data to the Air Compliance Section of the Department's Southwest District Office within 45 days of such testing. All submitted compliance test reports shall include a copy of the daily log as required by Specific Condition No. 19 for each test day. [Rules 62-297.310(7) and 62-297.310(8)(b), F.A.C.]

PERMITTEE:
Daughtrey Construction, Inc.

PERMIT No.: 0270013-003-AO
PROJECT: Air Curtain
Incinerator

23. Testing of emissions must be conducted within 90-100% of the maximum allowable charging rate* of 4.5 tons/hr. A compliance test submitted at a rate less than 90% of the maximum permitted charging rate will automatically constitute an amended permitted charging rate at that lesser rate, plus 10%. Within 30 days of that lower amended permitted charging rate being exceeded by more than 10%, a new compliance test shall be conducted at the higher rate. The test results shall be submitted to the Air Compliance Section of the Department's Southwest District Office within 45 days of testing. Acceptance of the test by the Department will automatically constitute an amended permit at the higher charging tested rate, plus 10%, but in no case shall the maximum permitted charging rate of 4.5 tons/hr. be exceeded. The emission limitations in Specific Condition Nos. 4 and 5 shall not change. [Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

* Charging rate is defined as 1) the amount of material placed in the incinerator during the period starting with the initial loading and ending 60 minutes after initial combustion, for the first 60 minute period after initial combustion and 2) the amount of material placed in the incinerator for any 60-minute period thereafter.

24. The visible emission test must be accomplished when the air curtain incinerator is charged with a mixture of materials as listed in Specific Condition No. 7, selected in order to ensure the visible emission test will be conducted when the highest emissions can reasonably be expected to occur. The visible emission test report shall include the charging rate, description of materials burned, starter fuel used, and a copy of the daily operating log for the test day. The DEP Method No. 9 test interval on this source shall be at least 90 minutes. The visible emission test shall begin upon initial combustion and include the first 90 minutes of the burn (30 minutes start-up and 60 minutes normal operation). [Rules 62-297.310(4)(a)2. and 62-4.070(3), F.A.C.]

25. The permittee shall notify the Air Compliance Section of this office at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

PERMITTEE:
Daughtrey Construction, Inc.

PERMIT No.: 0270013-003-AO
PROJECT: Air Curtain
Incinerator

26. An application to renew this operating permit shall be submitted to the Air Permitting Section of this office at least 60 days prior to the expiration date of this permit. Be sure to attach to the application, copies of at least 2 recent weeks of daily operating logs as required by Specific Condition No. 19. [Rules 62-4.070(3) and 62-4.090, F.A.C.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

W.C. Thomas, P.E.
District Air Program Administrator