



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

January 18, 2006

Mr. Anthony Fraccalvieri
Dixie Waste Services, LLC.
Post Office Box 850
Cross City, Florida 32628

Re: Dixie County – Air Permitting
Dixie Waste Services, LLC.
Dixie Waste Services Waste Gasification/Thermal Oxidizer
Notice of Application

Dear Mr. Anthony Fraccalvieri:

Pursuant to Section 403.815, Florida Statutes (F.S.) and Rule 17-103.150, Florida Administrative Code, you (the applicant) are required to publish at your own expense the enclosed Notice of Application. The 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. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Section 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 undersigned at the address or telephone number listed below.

The applicant shall provide proof of publication to the Department at the Northeast District Office, 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590, (904) 807-3300 as soon as possible upon publishing. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Sincerely,

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK: mcl

cc: Jeff Koerner, DARM
Bernardo Susi, P.E., Golder Associates, Inc.

**State of Florida
Department of Environmental Protection
Notice of Application**

The Department announces receipt of an application for a permit on December 22, 2005, from Mr. Anthony Fraccalvieri to construct a Waste Gasification/Thermal Oxidizer Unit. The applicant indicates that the capacity of the proposed unit is rated at 150 tons per day of waste incinerated. The types of waste that will be incinerated include municipal solid waste, tired-derived fuel and medical waste. A thermal oxidizer and a wet scrubber will be installed to control the air pollutants emissions generated from the incineration. The applicant indicates that the unit is subject to 40 CFR 60 - Subpart AAAA-Standards of Performance for New Stationary Sources: Small Municipal Waste Combustion Units. The applicant also indicates that the unit is not subject to the Prevention of Significant Deterioration (PSD) preconstruction review. The project is currently under review by the Department. This proposed project will be located at 322 NE 264th Street in Cross City, Dixie County, Florida.

This application is being processed and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at Department of Environmental Protection, Northeast District Office, 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590. Any comments or objections should be filed in writing with the Department at this address. Comments or objections should be submitted as soon as possible to insure that there is adequate time for them to be considered in the Department's decision on the application.



Department of Environmental Protection

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Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

January 20, 2006

Mr. Anthony Fraccalvieri
Dixie Waste Services, LLC.
Post Office Box 850
Cross City, Florida 32628

Dear Mr. Fraccalvieri:

Dixie County – Air Permitting
Dixie Waste Service Waste Gasification/Thermal Oxidizer
AIRS ID Number: 0290016
Request for Additional Information

Please note that in accordance with Florida Administrative Code Rule 62-4.055(1), F.A.C. and Chapter 120, Florida Statutes, the Department has reviewed the subject application and has determined that the following information and questions need to be answered before the application can be further processed.

Rule Applicability

1. Please evaluate the applicability of 40 CFR 60, Subpart Ec – Standard of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction Is Commenced After June 20, 1996, and F.A.C. Rule 62-296.401 (4) - Biological Waste Incineration Facilities to the proposed unit since the applicant plans to incinerate medical waste.

PSD Applicability

2. The applicant indicates that the facility is designed to facilitate the future plan with finished floor slab and pad that will allow for additional cell (s) for potential future increase in capacity. Please note that the “Municipal incinerators capable of charging more than 250 refuse per day” shall subject to PSD preconstruction review if the unit has the potential to emit 100 tons or more of any regulated air pollutant. Please clarify if the facility “will” increase the capacity in the future. The project may not be phased in order to avoid such review.

Preconstruction Requirements of 40 CFR 60 Subpart AAAA

3. Please submit the following five items as required by 40 CFR 60.1090.
 - a) Your draft materials separation plan.
 - b) Your revised materials separation plan.
 - c) Your notice of public meeting for your draft materials separation plan.
 - d) A transcript of the public meeting on your draft materials separation plan.
 - e) The document that summarizes your responses to the public comments you received during the public comment period on your draft materials separation plan.

Emissions Unit Pollutant Detail Information

4. In the application, page 19, Section E., Emissions Unit Pollutants, NO_x is listed as the only regulated pollutant for the emissions unit. Since the unit is subjected to NSPS, Subpart AAAAA, the applicant shall include all the pollutants in Table 1 of NSPS, Subpart AAAAA in the list and indicate the pollutant regulatory code as EL. Please provide the corrected page (s).
5. For each pollutant with an applicable standard, the potential emissions shall be based on the applicable standard (or requested standard) and the maximum operating conditions – not the stack test result and expected fuel mix. Please revise the calculations and submit the corrected page (s).
6. To properly establish the emissions cap to avoid PSD source classification, the applicant shall establish federally enforceable restrictions on the operating rate or hours of operation or maximum allowable emissions rate in the permit according to the definition of “allowable emissions” in Rule 62-210.200, F.A.C. Please describe how the facility plans to establish and demonstrate compliance with the emissions cap (s).
7. The applicant indicates that the potential mercury emissions from the unit are 228 lbs/year. Please describe how the facility plans to minimize such emissions.
8. In the application, Table A-2 identifies miscellaneous source tests for similar units. Please verify if any of the units have been tested for VOC emissions. Please provide the result of any VOC tests available for similar units and whether the emissions are uncontrolled or controlled by a thermal oxidizer.

Emissions Unit Capacity Determination

9. Please clarify whether the proposed unit is a batch or continuous municipal waste combustion unit according to the definitions in 40 CFR 60.1465.
10. Please demonstrate that the capacity of the unit is determined based on the method shown in 40 CFR 60.1460. Describe how the maximum designed charging rate is determined.
11. Describe how the facility will monitor the waste charging/destruction rate.

Process Descriptions

12. Please provide the following information:
 - a. The number of truck (s) required to fully loading a cell.
 - b. The number of truck (s) per day will deliver waste to the site.
 - c. Approximate time for each portion of the operating cycle: charging, control equipment startup, initial startup fuel firing in primary cell, gasification of the waste, cessation of startup fuel firing in primary cell, burn down, cessation of control equipment, and cool down.

Mr. Anthony Fraccalvieri
Dixie Waste Services, LLC.
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13. Please identify the conditions that determine when each control device can be shut down. Describe how the air supply is controlled to primary cell to create the "starved" air condition for successful waste gasification and result in low entrained PM.
14. Describe what is the "proper mix" of the flue gas and air in the secondary chamber that will resulting in low CO and organic gases emissions. Please demonstrate how the facility control and monitor the air input rate to achieve the "proper mix".
15. In the process flow diagram, please include the followings:
 - a. For each component, identify the inlet/outlet temperature ($^{\circ}$ F), inlet/outlet flow rate (acfm and scfm), and pressure drop across the component (inches w.c.): primary gasification cell; air mixing chamber; thermal oxidizer; acid gas scrubber; and the stack outlet.
 - b. The diagram indicates that natural gas will be used in the primary gasification cell as well as the thermal oxidizer. Elsewhere in the application, propane and diesel are identified for use in the primary gasification cell and propane for use in the thermal oxidizer. Please clarify.
 - c. Identify the location of the induced draft fan.
16. Describe does the project include a diesel tank and/or propane tank. Provide the size of the tank (s) if applicable.

Control Unit's Information

17. Please submit the information for the completed deigns scrubber unit. The information shall include but not limited to the manufacturer and model of the control unit, description of its operation, critical parameters and design operating level or each parameters (i.e., such as flow rate, pressure differential, pH level, etc.), manufacturer's guarantee for control efficiency and diagram of the control unit.
18. Please provide the following information about the thermal oxidizer:
 - a. Manufacturer.
 - b. General dimension (length, width, height, and volume) that will support the design residence time of 4 seconds.
 - c. Internal baffles and/or mixing areas (if any)
 - d. The number, general configuration, and the maximum heat input rate (MMBtu/hr) of each burner.
 - e. The location of the temperature monitor.

Miscellaneous Items

19. Please provide four readable (plan-sized) version of the site plan.
20. Please identify each component of the proposed system in the project area diagram. Please clarify whether the drawing show the system will have 3 cells or 6 cells.

Mr. Anthony Fraccalvieri
Dixie Waste Services, LLC.
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21. Please clarify if all the major roads, storage, parking and work areas will be paved. Describe how the facility plans to periodically remove particulate matter buildup on the paved areas.
22. The maximum dry standard flow rate in the application is identified as "3263 dscfm", but later also identified as "3263 dscm/minute". Please correct this data to term of "dscfm".
23. Please verify that the combustion is solely for waste disposal and not for energy recovery purpose.
24. Please provide details on how the ash generated from combustion will be handled and stored in accordance with Rule 62-701, F.A.C. Describe how the facility takes the precautions action to prevent fugitive emissions from ash handling.
25. Please describe how the facility plans to prevent and minimize the potential odor problems. Please estimate the distance of the closest residential area from the proposed site.
26. Please submit a startup/shutdown/malfunction plan to comply with the standard of NSPS, Subpart AAAA as indicated in the application.
27. Identify the location of the Dixie Waste Transfer Station on the area map. Please clarify if the Dixie Waste Transfer Station is contiguous/adjacent to the proposed site. Describe the relationship between Dixie Waste Transfer Station and Dixie Waste Service, LLC. Please explain how the relationship being established, for instance, through agreement/contract, and etc.
28. Please include all the fugitive emissions in the PTE estimations. Please note that if the Dixie Waste Transfer Station is determined to be the "Support Facility" to the proposed site, the air emissions from the "Support Facility" shall be included in the PTE estimations too.
29. In the application, Attachment A, Page 3, Paragraph 1 indicates, "vehicles discharge their waste loads directly into the cells." Please note that a waste inspection/sorting area is needed to be in compliance with FAC Rules 62-701.710(4)(a)2 & (c)2, which requires the waste to be sorted onsite and prohibited waste removed. Please explain how the prohibited waste will be sorted and stored in accordance with Rule 62-701, F.A.C.
30. Please verify if the Tired Derived Fuel (TDF) will be stored on site.
31. Please indicate if the facility will have any litter control devices or visual screenings to show compliance with Rule 62-701.710(3)(a), F.A.C.
32. Please verify if there will be a leachate control system on site in accordance with Rule 62-701.710(3)(b), F.A.C. Please demonstrate how leachate will be kept from mixing with stormwater in accordance with FAC Rules 701.710(3)(b) & (8).

Mr. Anthony Fraccalvieri
Dixie Waste Services, LLC.
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The subject application for permit cannot be processed until the above requested information is provided or corrected. In accordance with Rule 62-4.055(1), F.A.C., the response to this requested information is due within 90 (ninety) days from receipt of this letter, unless you (the applicant) request additional time. All information requested must be submitted by the applicant and certified by the professional engineer named in the application.

If you have any questions, please call MengChiu Lim at (904) 807-3238.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher L. Kirts". The signature is stylized and cursive.

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK:mcl
Enclosures
Cc: Jeff Koerner, DARM
Bernardo Susi, P.E., Golder Associates, Inc.