



LEE COUNTY
SOUTHWEST FLORIDA
BOARD OF COUNTY COMMISSIONERS

John E. Manning
District One

Cecil L. Pendergrass
District Two

Larry Kiker
District Three

Brian Hamman
District Four

Frank Mann
District Five

Roger Desjarlais
County Manager

Richard Wm. Wesch
County Attorney

Donna Marie Collins
Hearing Examiner

Mr. David Lyle Read, P.E.
Environmental Administrator
Permitting Section
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

May 1, 2015

FedEx Track # 8073 2126 6870

**RE: Lee County RRF
Draft/Proposed Permit No. 0710119-012-AV, Title V Air Operation Permit
Revision
Comments Regarding Draft Revised Permit Public Noticed April 8, 2015**

Dear Mr. Read:

On April 8, 2015, the Lee County RRF (Facility) published a public notice stating that a draft of Permit No. 0710119-012-AV, Title V Air Operation Permit Revision was available for public review and comment. The purpose of this letter is to submit Facility comments regarding the draft Title V permit revision to the FDEP for consideration as part of the official public comment period. In addition to the comments provided below, the Facility is providing the pertinent pages from the draft documents showing the Facility's recommended changes as attachments to this letter.

A. STATEMENT OF BASIS (see Attachment A)

1. Page 2 of 4, NSPS Table, First Row (40 CFR Part 60, Subpart A), E.U. ID No(s), column
EU 004 and EU 009 are subject to NSPS and should be added to the list.
2. Page 2 of 4, NSPS Table
A row should be added to the table indicating that 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines applies to EU 009.
3. Pages 3 of 4, PROJECT REVIEW
A bullet should be added indicating that Appendix TR was updated to reflect rule changes effective March 9, 2015.

B. Title V Air Operation Permit Revision – Main Body (see Attachment B)

1. Page ii, First paragraph

A fifth item should be added to the list indicating that some permit terms and an appendix were updated to reflect changes to regulatory requirements that became effective since issuance of the current permit.

2. Page 22 of 42, Condition B.7 continuation, First sentence on page
The “3” footnote at the end of the sentence should be corrected to “4”.
3. Page 32 of 42, Condition C.11
Condition C.10 requires an annual compliance test and will ensure that one will be conducted prior to permit renewal. Therefore, Condition C.11 is unnecessary and should be deleted. The remainder of conditions in this section should either be renumbered to reflect this deletion or Condition C.11 indicated as “reserved”.
4. Page 32 of 42, Condition C.12
The draft permit does not contain a Condition C.12 (nor does the current Title V permit). The remainder of conditions in this section should either be renumbered to reflect this or Condition C.12 indicated as “reserved”.
5. Pages 38 and 39 of 42, Condition D.15
40 CFR 60.4205(b) requires an owner or operator to comply with emission standards in §60.4202. §60.4202(a)(2) requires the engine manufacturer to meet the certification emission standards in 40 CFR 89.112 and 40 CFR 89.113. §89.113 contains two emission standard options for engines. The first option applies to individual engines, which is what is included in draft Condition D.15. The second option applies to families of engines. As such, a given engine may or may not comply with the numeric values presented in §89.113. However, based on the engine manufacturer’s certification that the engine meets the emission standards, compliance by the owner is ensured. Therefore, the Facility requests that the language of Condition D.15 be revised to the following:

D.15. The engine shall meet the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.
[40 CFR 60.4205(b) referencing 40 CFR 60.4202(a)(2)]
6. Page 39 of 42, Condition D.19
This requirement would only be triggered based on Condition D.20 and is redundant with the requirement in Condition D.20 that any required testing be completed in accordance with Subpart III. Therefore, the Facility requests that Condition D.19 be deleted and the remainder of conditions in this section either be renumbered to reflect this deletion or Condition D.19 indicated as “reserved”.
7. Page 39 of 42, Condition D.20
The regulatory citation for Condition D.20 should be corrected to “[40 CFR 60.4211(g)]”.

8. Page 39 of 42, Condition D.21
Condition D.21 applies only if an engine demonstrates compliance through stack testing rather than through manufacturer certification. The Facility is demonstrating compliance through manufacturer certification. Further, if performance testing is required by the NSPS at some point in the future, Condition D.20 imposes the NTE requirements by requiring that any required testing be conducted in accordance with Subpart III. Therefore, the Facility requests that Condition D.21 be deleted and the remainder of conditions in this section either be renumbered to reflect this deletion or Condition D.21 indicated as “reserved”.
9. Pages 39 and 40 of 42, Condition D.23
The regulatory citations for the terms of this condition indicate that their basis is 40 CFR Part 63, Subpart ZZZZ. However, according to 40 CFR 63.6590(c)(7) the engine must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart III and no further requirements apply under Subpart ZZZZ. Therefore, Condition D.23 should be deleted and the remainder of conditions in this section either be renumbered to reflect this deletion or Condition D.23 indicated as “reserved”.

C. Appendices

1. Appendix ASP
Page ASP-6 of 6 is missing from the draft.
2. Appendix ATP
Page ATP-4 of 4 is missing from the draft.
3. Appendix 40 CFR 60 Subpart A
 - a. Page 40 CFR 60, Subpart A-1 of 91, E.U. ID No. Column. The reference to EU 003 should be corrected to EU 006.
 - b. Page 40 CFR 60, Subpart A-6 and following of 91, §60.4. The draft permit contains information for all EPA regions and states that are listed in §60.4 as opposed to just those applicable to Florida as in the current Title V permit. The Facility requests that the unnecessary information be deleted for clarity.
4. Appendix 40 CFR 60 Subpart Eb, Page 40 CFR 60, Subpart EB-1 of 42
The reference to EU 003 should be corrected to EU 006.
5. Appendix 40 CFR 61 Subpart A, Page 40 CFR 61, Subpart A-1 of 4
The reference to EU 003 should be corrected to EU 006.
6. Appendix 40 CFR 61 Subpart E, Page 40 CFR 61, Subpart E-1 of 3
The reference to EU 003 should be corrected to EU 006.
7. Table 1, Summary of Air Pollutant Standards and Terms, Page Table 1-2 of 3

This page in the draft permit is a duplicate of page Table 1-1 of 3 and should be replaced with the summary for EU 004.

8. Table 1, Summary of Air Pollutant Standards and Terms, Page Table 1-3 of 3
The left side of this page in the draft permit is cut off.
9. Table 2, Summary of Compliance Requirements, Page Table 2-3 of 3
The entry for HF is an artifact that should be deleted. HF was deleted from the permit in action 0710119-008-AC (PSD-151E "Clean Up").

Thank you for your consideration of our comments. Should you have any questions, please contact me at (239-538-8000) or Mr. M. Kirk Dunbar of HDR Engineering, Inc. at (763-591-5476).

Sincerely,



Lindsey J. Sampson
Lee County Solid Waste Division Director

Attachments

cc: D. Castro - HDR Engineering, Inc.
K. Dunbar - HDR Engineering, Inc.
Tyler Huffman - Covanta Energy of Lee County
P. Keyes - Lee Public Utilities
M. Jacob - Lee Ass't Co. Atty
II E 105

ATTACHMENT A
Statement of Basis Recommended Changes

STATEMENT OF BASIS

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: This facility is classified under SIC Code No. 4953 - REFUSE SYSTEMS.

North American Industry Classification System (NAICS) Code: This facility is classified under NAICS Code No. 562213 - Solid Waste Combustors and Incinerators.

Title I - HAP: This facility is a major source of hazardous air pollutants (HAP), based on the Title V air operation permit renewal application.

NESHAP: This facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 Code of Federal Regulations (CFR) 63. The following emission units are subject to the NESHAP requirements:

Applicable Requirement	E.U. ID No(s).
40 CFR 63, Subpart A, General Provisions	008 - 011
40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)	008 - 011

Title IV: This facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: This facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: This facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: This facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60. The following emission units are subject to the NSPS requirements:

Applicable Requirement	E.U. ID No(s).
40 CFR 60, Subpart A, New Stationary Source Performance Standards (NSPS) General Provisions	001, 002 & 006 001, 002, 004, 006 & 009
40 CFR 60, Subpart Cb, Emissions Guidelines (EG) and Compliance Times for Large Municipal Waste Combustors	001, 002 & 004 (ash conveying systems)
40 CFR 60, Subpart Eb, Standards of Performance for Large Municipal Waste Combustors	006
40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	009

290.470, F.A.C.

Siting: This facility operates a unit subject to the power plant siting provisions of Chapter 62-17, F.A.C. [Power Plant Certification: PA90-30 for MWC Unit No. 3.]

CAM: Emission units at this facility are not subject to Compliance Assurance Monitoring (CAM) for one or more of the following reasons: they do not trigger the potential pre-air pollution control device major source emission thresholds; they demonstrate continuous compliance with a continuous emission monitoring system (CEMS); they are not equipped with air pollution control device(s); they are equipped with device(s) which are considered to be inherent to the process/operation; or, they satisfy CAM by meeting the post-1990 40 CFR 60 Subparts Cb/Eb federal monitoring requirements for the same or similar air pollutants.

The U.S. EPA letter dated July 7, 1999 (attached to permit), supports the use of monitoring under the post-1990 40 CFR 60 Subparts Cb/Eb to satisfy CAM for the same air pollutants and mentions the use of surrogate

STATEMENT OF BASIS

pollutants for similar air pollutants. Air pollutants specifically regulated under 40 CFR 60 Subparts Cb/Eb for Municipal Waste Combustors (MWCs) are: total particulate matter (PM); metals and metal compounds (cadmium (Cd), mercury (Hg) and lead (Pb)); all acid gases (including, but not limited to, sulfur dioxide (SO₂) and hydrogen chloride (HCl) gases); organic compounds (includes dioxins/furans (D/F)); nitrogen oxides (NO_x); and, carbon monoxide (CO). In addition to the air pollutant limits specified under 40 CFR 60 Subparts Cb/Eb for MWCs, some of the same air pollutants are regulated for other reasons i.e., PSD BACT, state implementation plan (SIP) standard, etc. A streamlined approach for multiple emission limits of the same air pollutant is preferred for simplified monitoring. As outlined in the U.S. EPA letter and described herein, monitoring under the post-1990 40 CFR 60 Subpart Cb/Eb for the municipal solid waste combustors (Unit Nos. 1, 2 and 3) is therefore, deemed to be adequate for the same air pollutants.

PROJECT REVIEW

This project review summarizes the changes made in this Title V air operation permit revision.

The changes made in the draft/proposed permit document are specifically shown as follows: deletions are noted in ~~strike through~~ and additions are noted in double underline. Where specific conditions were deleted subsequent condition were renumber accordingly. The changes will not be shown in the final permit documents.

- In Table of Contents added new applicable appendices.
- Title V Annual Emission Fee Changes. Section 403.0872, Florida Statutes (F.S.) was amended by House Bill (HB) 999, effective July 1, 2013. A few very important changes were made in the amendment which apply to the Title V annual emissions fee, namely: 1) the Title V annual emissions fee is now required to be calculated based upon actual emissions rather than allowable emissions, as in the past twenty years; 2) the due date for submitting the Title V annual emissions fee was changed from March 1st to April 1st; and, 3) the fee form was repealed and the fee requirement has been merged into the EAOR software product.

The previous specific conditions for the AOR requirement in Facility-wide Condition FW8. and the Title V annual emissions fee requirement in Facility-wide Condition FW9. have been combined into one Facility-wide Condition FW8. in Section II. of the permit.

- Subsection II. Facility-Wide Conditions. Incorporated applicable provisions of Permit No. 0710119-009-AC/PSD-FL-151F (biosolids construction permit) in new conditions FW11 to FW17.
- Subsection III.A. Municipal Waste Combustor Units 1 & 2 (E.U. ID Nos. 001 & 002) and Subsection III.B. Municipal Waste Combustor Unit 3 (E.U. ID No. 006). Incorporated the applicable provisions of Permit No. 0710119-009-AC/PSD-FL-151F (biosolids construction permit).
- Subsection III.B. Municipal Waste Combustor Unit 3 (E.U. ID No. 006). Removed an artifact from Permit No. 0710119-010-AC (ammonia monitoring). Permit No. 0710119-010-AC had already been incorporated into Permit No. 0710119-011-AV. The permitting note just before Specific Condition **III.B.28.** had ammonia slip listed as having a continuous monitor; continuous monitoring of ammonia slip was removed by Permit No. 0710119-010-AC.
- Subsection III.C. Ash Handling System (E.U. ID No. 004). Removed an obsolete reference to pressure drop equipment on the ash building baghouse.

The applicant provided a detailed justification to remove Specific Condition **III.C.8.** related to the pressure drop monitoring {see the Requested Changes “Attachment 4 - Ash Building Baghouse” supporting document in the permit revision application}. The baghouse vents internally, i.e., to the inside of the building. The VE standard applies to “visible emissions discharged to the atmosphere from buildings.” In conclusion, the VE standard from 40 CFR 60, Subpart Cb no longer applies directly to the baghouse exhaust since it is within the building. Therefore, the Department agrees that this condition is now deemed to be obsolete.

- Subsection III.D. Engines (E.U. ID Nos. 008 - 011). Reflected the replacement of Fire Pump No. 1 (E.U. ID No. 009).
- Appendix TR. Updated to reflect rule changes effective 3/9/15.

ATTACHMENT B
Draft Permit Main Body Recommended Changes



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

PERMITTEE:

Lee County Department of Solid Waste Management
10500 Buckingham Road
Fort Myers, Florida 33905-7012

Permit No. 0710119-012-AV
Lee County Resource Recovery Facility
Facility ID No. 0710119
Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation Permit No. 0710119-007-AV to: 1) remove an artifact from Permit No. 0710119-010-AC (ammonia monitoring). Permit No. 0710119-010-AC has already been incorporated into Permit No. 0710119-011-AV; 2) incorporate the provisions of Permit No. 0710119-009-AC (biosolids construction permit); 3) reflect the replacement of Fire Pump No. 1; and, 4) remove an obsolete reference to pressure drop equipment on the ash building baghouse. This existing facility is located at 10500 Buckingham Road, Fort Myers, in Lee County. UTM Coordinates are: Zone 17, 424.21 km East and 2945.70 km North. Latitude is: 26° 37' 54" North; and, Longitude is: 81° 45' 41" West.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

; and, 5) update permit terms and an appendix to reflect changes to regulatory language that became effective since issuance of the current Title V permit.

0710119-007-AV Effective Date: January 26, 2012
0710119-011-AV Effective Date: November 16, 2012
0710119-012-AV Effective Date: [ARMS Day 55]
Renewal Application Due Date: June 15, 2016
Expiration Date: January 26, 2017

(Draft/Proposed)

for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

JFK/dlr/sms

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection B. Emissions Unit 006

“Liquid biosolids” as defined in Rule 640.200, F.A.C., shall not be unloaded onto the tipping floor or combusted in the municipal solid waste combustor Unit Nos. 1, 2 and 3. ³ ← ⁴

fg. *Non-MSW Material.* Subject to the conditions and limitations contained in this permit, the following other solid waste materials may be used as fuel at the facility (i.e., the following are authorized fuels that are non-MSW material). The total quantity of the following non-MSW material received as segregated loads and burned at the facility shall not exceed 5%, by weight, of the facility’s total fuel. ¹ Compliance with this limitation shall be determined on a calendar month basis.

- (1) Unsorted mixtures of construction and demolition debris, or that fraction of sorted construction and demolition debris that is predominantly non-combustible. Non-combustible construction and demolition debris shall include concrete, metals, gypsum products, plaster, rock, brick, and masonry. ²
- (2) Oil spill debris from aquatic, coastal, estuarine or river environments. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (3) Items suitable for human, plant or domesticated animal use, consumption or application where the item’s shelf-life has expired or the generator wishes to remove the items from the market. Such items or materials include but are not limited to off-specification or expired consumer products, pharmaceuticals, medications, health and personal care products, cosmetics, foodstuffs, nutritional supplements, returned goods, and controlled substances.
- (4) Consumer-packaged products intended for human or domesticated animal use or application but not consumption. Such items or materials include but are not limited to carpet cleaners, household or bathroom cleaners, polishes, waxes and detergents.
- (5) Waste materials that:
 - (a) are generated in the manufacture of items in categories ~~§~~(3) or ~~§~~(4), above and are functionally or commercially useless (expired, rejected or spent); or
 - (b) are not yet formed or packaged for commercial distribution. Such items or materials must be substantially similar to other items or materials routinely found in MSW.
- (6) Waste materials that contain oil from:
 - (a) the routine cleanup of industrial or commercial establishments and machinery; or
 - (b) spills of virgin or used petroleum products. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (7) Used oil and used oil filters. Used oil containing a polychlorinated biphenyls (PCB) concentration equal or greater than 50 ppm shall not be burned, pursuant to the limitations of 40 CFR 761.20(e).
- (8) Waste materials generated by manufacturing, industrial or agricultural activities, provided that these items or materials are substantially similar to items or materials that are found routinely in MSW, subject to written prior approval of the Department.

[Rules 62-4.070(1)&(3), 62-213.410 and 62-213.440, F.A.C.; and, ¹ PSD-FL-151D, Condition B.6.6.; ² PSD-FL-151D, Condition B.6.7(a); and, ³ PSD-FL-151D, Condition B.24.; and, ⁴ Permit No. 0710119-009-AC/PSD-FL-151E.]

B.8. Auxiliary Burners - Methods of Operation - Fuels. Auxiliary burners for each MWC shall be fired only with natural gas or propane. Natural gas or propane may be used as a supplemental fuel during warm-up, startups, shutdowns, and at other times when necessary and consistent with good combustion practices. These devices shall be used at startup during the introduction of MSW fuel until design furnace gas temperature is achieved. [Rules 62-4.160(2), 62-210.200 (PTE), 62-213.410, and 62-213.440, F.A.C.; and, Permit No. 0710119-005-AC/PSD-FL-151D, Condition B.9.]

Air Pollution Control Technologies and Measures

B.9. Carbon Usage Rate. The carbon injection rate operating standard and monitoring requirements set forth in 40 CFR 60.58b(m) of 40 CFR 60, Subpart Eb, incorporated by reference in Rule 62-204.800, F.A.C., shall apply. See Appendix 40 CFR 60, Subpart Eb. [Rule 62-296.416(5), F.A.C.]

B.10. Air Pollutant Emission Control Equipment.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection C. Emissions Unit 004

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any requirement of an EG, NSPS or NESHAP provision.

- C.6. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
- C.7. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

- C.8. Pressure Drop Monitoring Equipment. The baghouse for E.U. ID No. 004, Ash Handling System, shall be equipped with pressure drop monitoring equipment. [PSD FL 151A.]<left blank>

Test Methods and Procedures

{Permitting note: Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

- C.9. Test Methods. Required tests shall be performed in accordance with the following reference method(s):

Method(s)	Description of Method(s) and Comment(s)
EPA Method 22	Visual Determination of Fugitive Emissions from Material Sources

The above methods are described in Chapter 62-297, F.A.C. and/or 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Chapter 62-297, F.A.C.]

- C.10. Annual Compliance Test. During each federal fiscal year (October 1st to September 30th), the ash handling system shall be tested to demonstrate compliance with the visible emissions (VE) limitation. [Rule 62-297.310(7), F.A.C.; and, PSD-FL-151 and PSD-FL-151B.]
- C.11. ~~Compliance Test During Permit Renewal. Prior to permit renewal, the ash handling system shall be tested to demonstrate compliance with the VE limitation. [Rule 62-297.310(7)(a), F.A.C.]~~
Delete Condition C.11
- C.13. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

- C.14. Reporting Schedule. The following report shall be submitted to the Compliance Authority:

Report	Reporting Deadline(s)	Related Condition(s)
Excess Emissions from Malfunctions, if requested by the Compliance Authority	Every 3 months (quarter)	C.15.

[Rule 62-210.700(6), F.A.C.]

- C.15. Excess Emissions from Malfunctions. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Compliance Authority. [Rule 62-210.700(6), F.A.C.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection D. Emissions Unit 008, 009, 010, & 011

The specific conditions in this part of the subsection apply to the following group of emissions units:

Group 2: "New" stationary CLRICE less than or equal to 500 HP	
E.U. ID No.	Brief Description
009	Fire Pump No. 1 (Diesel Emergency Generator) - 305 HP (EPA Tier 3 certified)

[Permitting note: This part of the subsection addresses "new" stationary CLRICE less than or equal 500 HP, with a displacement less than 10 liters per cylinder, that are located at a major source of HAP and that have been modified, reconstructed or commenced construction on or after 12/19/2002 and have a pre-2007 or 2007 & later model year.]

The following table provides important details for these emissions units:

E.U. ID No.	Engine Brake HP	Date of Construction	Model Year	Primary Fuel	Type of Engine	Displacement liters/cylinder (l/c)	Manufacturer
							Model #
009	305	2014	2014	Diesel	Emergency	6.8 {<10}	Clarke®
							JU6H-UFADX8
							PE6C68L25776

Applicability

D.12. Applicability. Pursuant to 40 CFR 63.6590(c), this engine must comply with 40 CFR 63, Subpart ZZZZ by meeting the requirements of NSPS 40 CFR 60, Subpart IIII. Pursuant to 40 CFR 63.6590(c), no further requirements apply to the engine under 40 CFR 63, Subpart ZZZZ. [Rules 62-204.800(11) & (8), F.A.C.; and, 40 CFR 63.6590(c)]

Essential Potential to Emit (PTE) Parameters

D.13. Allowable Fuel. The stationary RICE must use diesel fuel that meets the following requirements for non-road diesel fuel:

- a. **Sulfur Content.** The sulfur content shall not exceed 15 ppm (0.0015% by weight) for non-road diesel fuel.
- b. **Cetane and Aromatic.** The fuel must have a minimum cetane index of 40 or must have a maximum aromatic content of 35 volume percent.

[40 CFR 60.4207(b) and 40 CFR 80.510(b)]

D.14. Hours of Operation.

- a. **Emergency Situations.** There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 60.4211(e)]
- b. **Maintenance and Testing.** Each RICE is authorized to operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. [40 CFR 60.4211(e)]
- c. **Other Situations.** Each RICE cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 60.4219]

Emission Standards and Limitations

~~D.15. The following emission standards and limitations apply to this engine:~~ See following page

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection D. Emissions Unit 008, 009, 010, & 011

Replace with:

D.15. The engine shall meet the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.

[40 CFR 60.4205(b) referencing 40 CFR 60.4202(a)(2)]

D.16. Operation and Maintenance. The owner or operator must operate and maintain the stationary CI internal combustion engine according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those settings that are permitted by the manufacturer. The owner or operator must meet the requirements of 40 CFR 89, 94 and/or 1068, as they apply. [40 CFR 60.4211(a)]

Monitoring of Operations

D.17. Hour Meter. The owner or operator must install a non-resettable hour meter if one is not already installed. [40 CFR 60.4209(a)]

Compliance Requirements

D.18. Compliance Requirements. Owner or operator must demonstrate compliance according to one of the methods below:

- a. Certification. Have purchased an engine certified according to 40 CFR 89 or 94, as applicable, for the same model year and maximum engine power.
- b. Manufacturer Data. Keep records of engine manufacturer data indicating compliance with the standards.
- c. Vendor Data. Keep records of control device vendor data indicating compliance with the standards.
- d. Performance Test. Conduct an initial performance test to demonstrate compliance with the emission standards according to the testing requirements in this section.
- e. Similar Engine Tests. Keep records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.

[40 CFR 60.4211(b)]

Testing Requirements

D.19. Performance Test. Performance test must be conducted according to the in-use testing procedures in 40 CFR 1022, Subpart C, 40 CFR 89.4212.

D.20. Engine Manufacturer's Recommendations and Instructions. If the owner/operator does not install, configure, operate, and maintain the engine according to the manufacturer's recommendations and instructions, any required testing shall be completed in accordance with 40 CFR 60, Subpart III. [40 CFR 60.4212.] [60.4211(g)]

D.21. Not to exceed (NTE) Standards. Exhaust emissions from stationary CI/CE that are complying with the same emission standard shall not exceed 1.25 times the standard. [40 CFR 60.4214]

Recordkeeping Requirements

D.22. Required Records. Owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner or operator must record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60.4214]

D.23. Record Retention.

- ~~a. The owner or operator must keep records in a suitable and readily available form for expeditious reviews.~~

See following page

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection D. Emissions Unit 008, 009, 010, & 011

Replace with:

D.23. Recordkeeping. The owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60.4214(b)]

NSPS 40 CFR 60, Subpart A & IIII Requirements

D.24. NSPS Requirements - Subpart A. This emissions unit shall comply with all applicable requirements of 40 CFR 60, Subpart A, General Provisions, including:

40 CFR 60.7, Notification and Recordkeeping

40 CFR 60.8, Performance Tests

40 CFR 60.11, Compliance with Standards and Maintenance Requirements

40 CFR 60.12, Circumvention

40 CFR 60.13, Monitoring Requirements

40 CFR 60.19, General Notification and Reporting Requirements.

which have been adopted by reference in Rule 62-204.800(8)(d), F.A.C.; except that the Secretary is not the Administrator for purposes of 40 CFR 60.4, 40 CFR 60.8(b)(2) and (3), 40 CFR 60.11(e)(7) and (8), 40 CFR 60.13(g), (i) and (j)(2), and 40 CFR 60.16. The applicable 40 CFR 60, Subpart A, General Provisions to which this emissions unit are subject to are found at 40 CFR 63.4218 and are included in **Appendix 40 CFR 60 Subpart A.** [Rule 62-204.800(8)(d), F.A.C.]

D.25. 40 CFR 60 Requirements - Subpart IIII [Generally Applicable Requirements]. This emissions unit shall comply with all applicable requirements of 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, which have been adopted by reference in Rule 62-204.800(8), F.A.C. This emissions unit shall comply with **Appendix 40 CFR 60 Subpart IIII "Generally Applicable Requirements,"** included with this permit, which includes applicable requirements that apply in general to all engines regulated under 40 CFR 60, Subpart IIII. This appendix also contains useful information like definitions (see 40 CFR 60.4219) that are specific to engines regulated under 40 CFR 60 Subpart IIII. [Rule 62-204.800(8), F.A.C.]

THE FOLLOWING SPECIFIC CONDITIONS APPLY TO ALL EMISSIONS UNITS.

Operation and Maintenance Requirements

{Permitting note: TABLE E-1, SUMMARY OF MAINTENANCE REQUIREMENTS FOR ENGINES, summarizes maintenance requirements under 40 CFR 63, Subpart ZZZZ for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Test Methods and Procedures

D.26. Common Testing Requirements. Any tests, if required, shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

D.27. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440, F.A.C.]

NESHAP 40 CFR 63, Subpart A & ZZZZ Requirements

D.28. 40 CFR 63 Requirements - Subpart A. These emissions units shall comply with all applicable requirements of 40 CFR 63, Subpart A, General Provisions, which have been adopted by reference in Rule 62-204.800(11)(d)1., F.A.C., except that the Secretary is not the Administrator for purposes of 40 CFR 63.5(e), 40 CFR 63.5(f), 40 CFR 63.6(g), 40 CFR 63.6(h)(9), 40 CFR 63.6(j), 40 CFR 63.13, and 40 CFR 63.14. The applicable 40 CFR 63, Subpart A, General Provisions to which these emissions are subject to are