

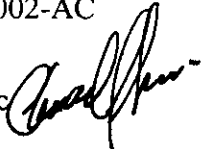
Florida Department of
Environmental Protection

Memorandum

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JUN 25 2003

TO: File 0710119-002-AC
PSD-FL-151C

FROM: Edward J. Svec 

DATE: June 25, 2003

SUBJECT: Comment on the Draft Air Construction Permit

BUREAU OF AIR REGULATION

Prior to the first draft of above referenced permit being mailed for public notice on April 4, 2003, I participated in a meeting with Al Linero and Trina Vielhauer on the content of some of the items contained in the draft permit. At that time, I expressed concern that, by customizing the rule language for excess emissions, we would not be able to carry all applicable requirements into the Title V permit, as required, because the PSD permit would effectively exempt the facility from our SIP requirements. At that time, I provided the conditions, quoted from the rules, which had been reviewed and approved addressing excess emissions from waste-to-energy facilities. I just reviewed the proposed language contained in the reissue of the draft permit that was mailed for public notice on June 11, 2003, and it appears that, by customizing the language, the facility has been exempted from Rule 62-210.700(1), F.A.C., and was not required to be subject to the applicable requirements contained in 40 CFR 60.11. To correct this, the following change is recommended:

From: B.7 Startup/Shutdown/Malfunxions

- (a) 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. As referenced below, and provided for by the NSPS, the Department specifically authorizes longer durations.
- (b) The emission limitations for this unit shall apply at all times, except during periods of warm-up, startup, shutdown, or malfunctions (SSM), provided that the duration of startup, shutdown, or malfunction periods do not exceed 3 hours per occurrence. The duration of warm-up periods is not limited. The startup period commences when the affected unit begins the continuous burning of waste and does not include any warm-up period when the affected unit is combusting only natural gas or propane and waste is not being

introduced to the combustor. The use of waste solely to provide thermal protection to the grate during the warm-up periods when waste is not being fed to the combustor is not considered to be continuous burning. During all startups, shutdowns, and malfunctions, the owner/operator shall use best operational practices to minimize air pollutant emissions.

(c) A malfunction means any unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Excess emissions that are caused entirely or in part by poor maintenance, careless operation, any other preventable upset condition, or preventable equipment breakdown shall not be considered malfunctions. Excess emissions resulting from startup, shutdown or malfunction of any source 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 3 hours per occurrence, except as noted in Condition B.7(d).

(d) Due to safety and equipment concerns, the SSM exemption period is allowed to be extended to a maximum of 15 hours in certain circumstances. The extended exemption applies only to CO emission limits in §60.53b(a) i.e., combustor operating practices during the following two situations:

- A loss of boiler water control (e.g., boiler waterwall tube failure); or
- A loss of combustion air control (loss of a combustion air fan, loss of an induced draft fan, or combustion grate bar failure).

Normal operating practices for controlling CO emissions involves the use of auxiliary fuel burners. However, use of these burners when operators cannot control boiler water or combustion air could result in the possibility of an explosion or severe damage to the MWC.

[Rule 62-210.700, and 62-204.800(8), F.A.C., and 40 CFR 60.58b(a)(1)]

To: B.7 Startup/Shutdown/Malfunctions

B.7.1. The opacity standards set forth in 40 CFR 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

[40 CFR 60.11(c)]

B.7.2. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

B.7.3. Startup, Shutdown and Malfunction. Except as provided by 40 CFR 60.56b, the standards under 40 CFR 60, Subpart Cb, as incorporated in Rule 62-204.800(8)(b), F.A.C., apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup or shutdown periods are limited to 3 hours per occurrence, except as provided in 40 CFR 60.58b(a)(1)iii.

(i) The startup period commences when the affected facility begins the continuous burning of municipal solid waste and does not include any warm-up period when the affected facility is combusting fossil fuel or other nonmunicipal solid waste fuel, and no municipal solid waste is being fed to the combustor.

(ii) Continuous burning is the continuous, semicontinuous, or batch feeding of municipal solid waste for purposes of waste disposal, energy production, or providing heat to the combustion system in preparation for waste disposal or energy production. The use of municipal solid waste solely to provide thermal protection of the grate or hearth during the startup period when municipal solid waste is not being fed to the grate is not considered to be continuous burning.

[40 CFR 60.38b and 40 CFR 60.58b(a)]

B.7.4. For the purpose of compliance with the carbon monoxide emission limits in 40 CFR 60.53b(a), if a loss of boiler water level control (e.g., loss of combustion air fan, induced draft fan, combustion grate bar failure) is determined to be a malfunction, the duration of the malfunction period is limited to 15 hours per occurrence.

[40 CFR 60.58b(a)(1)iii]

B.7.5. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to and 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. The Department authorizes three hours in any 24-hour period for this emissions unit. A malfunction means any unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner.

[Rule 62-210.700(1), F.A.C.]

B.7.6. 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.]

cc: Trina Vielhauer
Scott Sheplak
Al Linero
Pat Comer