



**LEE COUNTY**  
SOUTHWEST FLORIDA

**BOARD OF COUNTY COMMISSIONERS**

John E. Manning  
District One

A. Brian Bigelow  
District Two

Ray Judah  
District Three

Tammy Hall  
District Four

Frank Mann  
District Five

Karen B. Hawes  
County Manager

David M. Owen  
County Attorney

Diana M. Parker  
County Hearing  
Examiner

RECEIVED

DEC 14 2010

BUREAU  
AIR REGULATION

December 9, 2010

Mr. Scott M. Sheplak, P.E.  
DEP – Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399

**RE: Lee County Resource Recovery Facility (RRF)  
Title V Air Operation Permit Renewal Application, File Number 0710119-  
007-AV  
Additional Information Requested by FDEP Letter Dated October 6, 2010**

Dear Mr. Sheplak:

On October 6, 2010, the Florida Department of Environmental Protection (FDEP) issued a letter to the Lee County RRF (Facility) stating that review of the Facility's Title V permit renewal application, electronically submitted on August 23, 2010, had begun. The letter stated that FDEP needs additional information in order to continue processing the application. The purpose of this letter is to submit the additional information requested by the FDEP.

**Title V Air Operation Permit Renewal for Municipal Waste Combustor (MWC) Unit Nos. 1-3, Emissions Unit Identification Numbers (E.U. ID Nos.) -001, -002, & -006**

1. **Renewal Compliance Testing Requirements:** *The emissions units in operation under this permit renewal project, e.g., three municipal solid waste combustors Unit Nos. 1, 2, and 3 with auxiliary burners, lime storage silo and ash handling system, are required to demonstrate compliance. In the EPSAP, a cover letter for compliance testing results was attached.*
  - a. **Compliance Testing:** *Where compliance testing is required, was compliance successfully demonstrated by each emissions unit? What were the actual test results? {There is no need to attach the entire test results, you may simply reference the previously submitted test results.} Please prepare a chart showing the actual test results versus the emission standards/limitations.*

**Answer**

Yes, compliance was successfully demonstrated by each emissions unit. The following three tables summarize the test results, along with a comparison to the applicable emission standards/limitations, for each of Unit Nos. 1, 2, and 3.

**Table 1.a.1 – E.U. 001 2010 Stack Test Results**

Permit Term	Pollutant	Units of Measure <sup>a</sup>	Test Result <sup>b</sup>	Permit Limit	Compliance?
A.21	PM/PM <sub>10</sub>	gr/dscf	<0.000112	0.010	Yes
		lb/hr	<0.0578	5.34	Yes
A.22	Opacity	percent	0	10	Yes
A.23.b	Cadmium	mg/dscm	0.000880	0.035	Yes
A.24.b	Mercury	mg/dscm <sup>c</sup>	0.00313	0.050	Yes
		% reduction <sup>c</sup>	95.2	85	
A.25	Mercury	lb/MMBtu	2.81E-06	0.000138	Yes
		lb/hr	0.000695	0.0379	Yes
A.26.b	Lead	mg/dscm <sup>c</sup>	0.00710	0.400	Yes
A.26.c	Lead	lb/MMBtu	6.38E-06	0.00060	Yes
		lb/hr	0.00157	0.165	Yes
A.27	Fluoride	ppm	<0.446	5.0	Yes
		lb/MMBtu	<0.000333	0.0035	Yes
		lb/hr	<0.0776	0.96	Yes
A.28	Beryllium	lb/MMBtu	<2.95E-08	1.38E-07	Yes
		lb/hr	<7.24E-06	3.70E-05	Yes
A.29	VOC	ppm	0.2	37	Yes
		lb/MMBtu	0.0004	0.02	Yes
		lb/hr	0.1	5.80	Yes
A.31	HCl	ppm <sup>c</sup>	9.27	25	Yes
		% reduction <sup>c</sup>	98.8	95	
A.32	Dioxin/Furans	ng/dscm	4.02 <sup>d</sup>	30	Yes
		lb/MMBtu	3.62E-09	2.54E-08	Yes
		lb/hr	9.78E-07	7.0E-06	Yes
A.35	H <sub>2</sub> SO <sub>4</sub>	lb/MMBtu	<0.000101	0.036	Yes
		lb/hr	<0.0233	9.85	Yes
A.36	Arsenic	lb/MMBtu	4.87E-07	9.10E-06	Yes
		lb/hr	1.20E-04	2.50E-03	Yes
A.37	Ammonia	ppm	1.49	50	Yes

<sup>a</sup> All concentration and percent reduction values are corrected to 7 percent oxygen.

<sup>b</sup> Average of three runs.

<sup>c</sup> Whichever is less stringent.

**Table 1.a.2 – E.U. 002 2010 Stack Test Results**

Permit Term	Pollutant	Units of Measure <sup>a</sup>	Test Result <sup>b</sup>	Permit Limit	Compliance?
A.21	PM/PM <sub>10</sub>	gr/dscf	0.000259	0.010	Yes
		lb/hr	0.132	5.34	Yes
A.22	Opacity	percent	0	10	Yes
A.23.b	Cadmium	mg/dscm	0.00187	0.035	Yes
A.24.b	Mercury	mg/dscm <sup>c</sup>	0.00298	0.050	Yes
		% reduction <sup>c</sup>	95.9	85	
A.25	Mercury	lb/MMBtu	2.68E-06	0.000138	Yes
		lb/hr	0.000661	0.0379	Yes
A.26.b	Lead	mg/dscm <sup>c</sup>	0.0131	0.400	Yes
A.26.c	Lead	lb/MMBtu	1.18E-05	0.00060	Yes
		lb/hr	0.00291	0.165	Yes
A.27	Fluoride	ppm	<0.173	5.0	Yes
		lb/MMBtu	<0.000130	0.0035	Yes
		lb/hr	<0.0312	0.96	Yes
A.28	Beryllium	lb/MMBtu	<5.92E-08	1.38E-07	Yes
		lb/hr	<1.47E-05	3.70E-05	Yes
A.29	VOC	ppm	0.5	37	Yes
		lb/MMBtu	0.001	0.02	Yes
		lb/hr	0.2	5.80	Yes
A.31	HCl	ppm <sup>c</sup>	9.32	25	Yes
		% reduction <sup>c</sup>	98.8	95	
A.32	Dioxin/Furans	ng/dscm	5.81 <sup>d</sup>	30	Yes
		lb/MMBtu	1.27E-06 <sup>d</sup>	2.54E-08	Yes
		lb/hr	5.22E-09 <sup>d</sup>	7.0E-06	Yes
A.35	H <sub>2</sub> SO <sub>4</sub>	lb/MMBtu	<0.000111	0.036	Yes
		lb/hr	<0.029	9.85	Yes
A.36	Arsenic	lb/MMBtu	4.14E-07	9.10E-06	Yes
		lb/hr	1.03E-04	2.50E-03	Yes
A.37	Ammonia	ppm	1.51	50	Yes

<sup>a</sup> All concentration and percent reduction values are corrected to 7 percent oxygen.

<sup>b</sup> Average of three runs.

<sup>c</sup> Whichever is less stringent.

<sup>d</sup> Units 1 and 2 are eligible for reduced dioxin/furan testing, per 40 CFR §60.38b(b) referencing 40 CFR §60.58b(g)(5)(iii). Therefore, Unit 2 was not tested for dioxin emissions in 2010 and the values shown represent the 2009 dioxin test results for Unit 2.

**Table 1.a.3 – E.U. 003 2010 Stack Test Results**

Permit Term	Pollutant	Units of Measure <sup>a</sup>	Test Result <sup>b</sup>	Permit Limit	Compliance?
D.4(a) and D.8	PM/PM <sub>10</sub>	mg/dscm	<0.0385	20.6	Yes
		lb/hr	<0.00902	5.12	Yes
D.8	Opacity	percent	0	10	Yes
D.8	Cadmium	mg/dscm	0.000141	0.02	Yes
		lb/hr	0.0000332	0.005	Yes
D.8	Mercury	mg/dscm <sup>c</sup>	0.00255	0.028	Yes
		% reduction <sup>c</sup>	97.3	85	
		lb/hr	0.000609	0.0168	Yes
D.8	Lead	mg/dscm <sup>c</sup>	0.00137	0.2	Yes
		lb/hr	0.000320	0.05	Yes
D.8	Hydrogen Fluoride	ppm	<0.110	3.5	Yes
		lb/hr	<0.0207	0.718	Yes
D.8	HCl	ppm <sup>c</sup>	3.82	25	Yes
		% reduction <sup>c</sup>	99.5	95	
		lb/hr	1.33	46.76	Yes
D.8	Dioxin/Furans	ng/dscm	0.362	13	Yes
		lb/hr	8.59E-08	3.2E-06	Yes
D.4(d) and D.8	Ammonia	ppm	1.73	30	Yes

<sup>a</sup> All concentration and percent reduction values are corrected to 7 percent oxygen.

<sup>b</sup> Average of three runs.

<sup>c</sup> Whichever is less stringent.

- b. *Steam Production Rates and Capacity: What was the steam production rate in lbs./hour during the compliance tests? Where [sic] the compliance tests conducted within 90-100% of capacity as required by specific conditions A.62. and D.14. of Permit No. 0710119-006-AV?*

**Answer**

The following table summarizes the test results, along with a comparison to the applicable emission standards/limitations, for each of Unit Nos. 1, 2, and 3.

**Table 1.b –2010 Stack Test Steam Flows (klb/hr)**

<b>Pollutant</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>
<b>E.U. 001</b>				
PM/PM <sub>10</sub> /Metals	159.7	159.1	159.9	159.6
Opacity	-	-	-	158.3
Fluoride	156.5	155.8	156.1	156.1
VOC	159.7	159.9	159.4	159.7
HCl	159.8	159.4	159.0	159.4
Dioxin/Furan	160.1	160.6	160.2	160.3
H <sub>2</sub> SO <sub>4</sub>	154.9	156.2	157.0	156.0
Ammonia	155.3	157.2	157.2	156.6
<b>E.U. 002</b>				
PM/PM <sub>10</sub> /Metals	158.7	158.5	159.2	158.8
Opacity	-	-	-	158.9
Fluoride	155.9	156.5	156.1	156.2
VOC	159.3	158.3	158.8	158.8
HCl	158.0	159.0	157.2	158.1
Dioxin/Furan	NA*	NA	NA	NA
H <sub>2</sub> SO <sub>4</sub>	154.8	155.6	154.9	155.1
Ammonia	155.4	155.8	156.1	155.8
<b>E.U. 003</b>				
PM/PM <sub>10</sub> /Metals	169.3	172.5	172.5	171.4
Opacity	-	-	-	173.9
Fluoride	159.6	161.0	171.7	164.1
HCl	171.0	168.8	173.8	171.2
Dioxin/Furan	172.4	169.5	170.6	170.8
Ammonia	160.5	162.3	161.2	161.3

\* Under the alternative test schedule allowed by 40 CFR §60.38(b), Unit No. 1 was tested in the 2010 compliance testing. The 2010 conditions determined for Unit No. 1 will apply as the operating limits for Unit No. 2 until the 2011 compliance testing is completed.

MWC Unit Nos. 1 and 2 each have a design rated capacity of 186.2 klb steam/hr and 90% of this value corresponds to 167.6 klb steam/hr. Based on this, none of the stack testing performed for MWC Unit Nos. 1 and 2 was conducted within 90-100% of capacity.

MWC Unit No. 3 has a design rated capacity of 197.4 klb steam/hr and 90% of this value corresponds to 177.7 klb steam/hr. Based on this, none of the stack testing performed for MWC Unit No 3 was conducted within 90-100% of capacity.

Regardless of the steam flows during the testing, all stack test results were significantly below permitted levels.

- c. *MWC Parameters: Was the maximum demonstrated unit load, maximum demonstrated inlet temperature to baghouse and average carbon mass feed rate provided in the compliance test report(s)? What were the values?*

**Answer**

Yes, the requested information was provided to FDEP in the 2010 compliance test report. Following is a summary of the MWC parameters determined for each of Unit Nos. 1, 2, and 3 during the 2010 compliance testing.

**Unit 1:**

Maximum Demonstrated Unit Load – 160.6 klb/hr (results in limit of 177 klb/hr)  
Maximum Demonstrated FF Inlet Temperature – 290 °F (results in limit of 320 °F)  
Average Carbon Feed Rate (Dioxin/Furan Testing) – 25.3 lb/hr  
Average Carbon Reed Rate (Mercury Testing) – 25.2 lb/hr

**Unit 2:**

Maximum Demonstrated Unit Load – 160.1 klb/hr (results in limit of 177 klb/hr)\*  
Maximum Demonstrated FF Inlet Temperature – 290 °F (results in limit of 320 °F)\*  
Average Carbon Feed Rate (Dioxin/Furan Testing) – 25.3 lb/hr  
Average Carbon Reed Rate (Mercury Testing) – 25.1 lb/hr

\* Under the alternative test schedule allowed by 40 CFR §60.38(b), Unit No. 1 was tested in the 2010 compliance testing. The 2010 conditions determined for Unit No. 1 will apply as the operating limits for Unit No. 2 until the 2011 compliance testing is completed.

**Unit 3:**

Maximum Demonstrated Unit Load – 172.4 klb/hr (results in limit of 190 klb/hr)  
Maximum Demonstrated FF Inlet Temperature – 292 °F (results in limit of 322 °F)  
Average Carbon Feed Rate (Dioxin/Furan Testing) – 25.9 lb/hr  
Average Carbon Reed Rate (Mercury Testing) – 26.0 lb/hr

2. Compliance Assurance Monitoring (CAM): CAM applicability had been addressed and described in previous permitting actions for MWC Unit Nos. 1-3 {see the Statement of Basis and the individual emissions unit subsections of Permit No. 0710119-006-AV}. CAM had applied to MWC Unit No. 3, a CAM Plan was approved and attached as part of the permit.

a. MWC Unit No. 3: In the EPSAP for MWC Unit No. 3, CAM was not checked as being applicable (see Section III. Emissions Unit Information, I. Emissions Unit Additional Information, Additional Requirements for Title V Air Operating Permit Applications, Field 2., Compliance Assurance Monitoring Plan}. Unless something has changed, CAM still appears to apply to MWC Unit No. 3. Please provide a Microsoft® Word version of the proposed CAM Plan for MWC Unit No. 3 as part of this permit renewal project.

**Answer**

As referenced in FDEP's question, CAM is applicable to MWC Unit No. 3. And, as referenced, a CAM plan for MWC Unit 3 has been submitted to, approved by, and inserted into Permit No. 0710119-006-AV by FDEP. Our interpretation of the provisions of 40 CFR Part 64 was that once a CAM plan was submitted, future Title V renewal applications were not required to include a CAM plan. This is why CAM was not indicated in the renewal application as being applicable and no proposed CAM plan was attached.

As requested, attached is a Microsoft version of the proposed CAM Plan for MWC Unit 3, which is identical to the CAM Plan previously approved and implemented by FDEP.

b. MWC Unit Nos. 1 and 2: In the EPSAP for MWC Unit Nos. 1 and 2, CAM was not checked as being applicable. The PSD permit, PSD-FL-151, limits sulfuric acid mist (SAM) and fluoride (F) emissions. The emission limits for SAM and F emissions are 39.3 tons per year (TPY) and 3.8 TPY, respectively. Using a control device efficiency of 80% for SAM and F emissions, pre-control device emissions of SAM are calculated to be 196.5 TPY and pre-control device emissions of F as hydrogen fluoride (HF) are calculated to be 19 TPY. This cursory review indicates that CAM applies to these units for SAM and F. Please re-evaluate CAM applicability for these two pollutants from Unit Nos. 1 and 2, providing all supporting calculations and justification. If CAM does apply to MWC Unit Nos. 1 and 2, please provide a Microsoft® Word version of the proposed CAM Plan for MWC Unit No. 3 as part of this permit renewal project.

**Answer**

According to the CAM applicability discussion on pages 8 and 9 Permit No. 0710119-006-AV, CAM is not applicable to MWC Unit Nos. 1 and 2. Specifically, regarding the applicability of CAM to SAM and F, page 8 of Permit No. 0710119-006-AV states the following:

“The Applicant provided justification that demonstrated that ... the PTE for fluoride is less than ten tons per year ... and the PTE for sulfuric acid mist is less than 100 tons per year.”

Although not clearly stated in this excerpted language, the PTE referenced for both fluoride and sulfuric acid mist emissions is the uncontrolled PTE. To support the fact that CAM does not apply to SAM or F emissions please see Attachment 2, which is the justification, submitted to and approved by, the FDEP in connection with the facility’s initial Title V permit renewal. The document from which Attachment 2 was extracted was obtained from FDEP’s website documentation for Permit No. 0710119-004-AV (<http://arm-permit2k.dep.state.fl.us/psd/0710119/000022A6.pdf>).

3. Requested Test Method Modifications: *In the requested changes document, several test method modifications were requested.*

a. Hydrogen Chloride (HCl) Emissions Testing: *The permit requires an EPA Method 26 or 26A for the determination of HCl emissions. It was mentioned that the Department has approved a modification to the Method 26/26A train when sampling HCl emissions per Errin Pritchard’s 01/08/2010 e-mail. You provided an excerpt of the e-mail. Please provide a complete copy of the referenced e-mail.*

**Answer**

A complete copy of the referenced email, along with an attachment referenced in the email, is provided as Attachment 3.

b. Dioxin/Furan (D/F) Emissions Testing: *Thank you for provided in the U.S. EPA test method modification to EPA Method 23, date June 23, 2004. You cited a 01/08/2010 e-mail from the Department also approving this modified method. The additional attachments referenced as part of the requested document were not included. Please provide a complete copy of the referenced e-mail.*

**Answer**

The reference to a 01/08/2010 e-mail from the Department was an error. The U.S. EPA letter approving the test method modification that was submitted with the permit application is the only document that should have been referenced. We apologize for any confusion this may have caused.

4. Stack Information: *The stack exit temperatures and gas flow rates for MWC Unit Nos. 1, 2 and 3 were blank in the EPSAP {see Section III. Emissions Unit Information, C. Emission Point (Stack/Vent) Information, Fields 8., 9. and 11.}. Please provide the stack exit temperatures and both the “acfm” and the “dscfm” stack gas flow rate values.*



**Answer**

The stack parameters requested were not included because they can vary greatly during unit operation. Following are the values previously included in the Unit 3 Title V revision application:

MWC Unit No. 1 – 270 °F, 116,943 acfm, 72,039 dscfm

MWC Unit No. 2 – 270 °F, 116,943 acfm, 72,039 dscfm

MWC Unit No. 3 – 270 °F, 163,600 acfm, 69,200 dscfm

5. *Cooling Tower: In Appendix U-1, List of Unregulated Emissions Units and/or Activities, “cooling tower” is listed. Does the cooling tower use chromium-based water treatment chemicals?*

No. Please see Attachment 4.

6. *Applicable Requirements – Federal Regulation Amendments, Municipal Waste Combustors (MWC) 40 Code of Federal Regulations (CFR) 60, Subparts Eb and Cb: U.S. EPA had amended 40 CFR 60, Subparts Eb & Cb on May 10, 2006, and they were subsequently adopted by reference into the Florida rules on May 31, 2007, at Rule 62-204.800(8)(b)(7)., Florida Administrative Code (F.A.C.) and Rule 62-204.800(9)(b), F.A.C. The new emission standards/limits took effect April 28, 2009 (compliance deadline) for all of the amendments. The revised permit, Permit No. 0710119-006-AV for MWC Unit Nos. 1-3, effective July 14, 2009, contained the amendments.*

*In the requested changes documents, you requested the May 10, 2006 federal amendment changes to be integrated directly into each respective affected specific condition within the body of the permit.*

- a. *Lee County had previously indicated that no modifications to the units would be required to come into compliance with the federal amendment changes. Where [sic] any modifications to MWC Unit Nos. 1-3 necessary to come into compliance with the federal amendment changes”*

No modifications were necessary to come into compliance with the federal amendment changes.

The remainder of the Additional Information Request was informational and is not addressed further.

Attached is a Responsible Official Certification as required by Rule 62-213.420(4) of the Florida Administrative Code for any document submitted to the Department for a Title V facility. In addition, a registered Professional Engineer certification is attached, per Department policy regarding the submittal of additional information of an engineering nature. Should you have any questions, please contact me at (239-338-3302) or Mr. M. Kirk Dunbar of HDR Engineering, Inc. at (763-591-5476).

Sincerely,

A handwritten signature in black ink that reads "Lindsey J. Sampson". The signature is written in a cursive style with a large initial 'L'.

Lindsey J. Sampson  
Lee County Solid Waste Division Director


Attachments

- cc: D. Castro - HDR Engineering, Inc.
- K. Dunbar - HDR Engineering, Inc.
- M. Halpin, P.E. - DEP-Siting
- A. Satyal - DEP-SD
- G. Ball-Ilovera - Covanta Energy of Lee County

## APPLICATION INFORMATION

### Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: LINDSEY SAMPSON
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: LEE COUNTY Street Address: 10500 BUCKINGHAM ROAD SUITE 200 City: FORT MEYERS State: FL Zip Code: 33905
4. Application Responsible Official Telephone Numbers... Telephone: (239) <del>338-3302</del> <sup>333-8000</sup> ext. Fax: (239) 461-5871
5. Application Responsible Official E-mail Address: sampsolj@leegov.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date <u>12/9/10</u>

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: DONALD CASTRO Registration Number: 44569
2. Professional Engineer Mailing Address... Organization/Firm: HDR ENGINEERING, INC. Street Address: 5426 Bay Center Drive, Suite 400 City: TAMPA State: FL Zip Code: 33609
3. Professional Engineer Telephone Numbers... Telephone: (813) 282 - 2404 ext. Fax: ( ) -
4. Professional Engineer E-mail Address: DON.CASTRO@HDRINC.COM
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <i>Donald J. Castro 12/7/10</i> Signature Date (seal)

\* Attach any exception to certification statement.

