

# Memorandum

# Florida Department of Environmental Protection

TO: Jeffery F. Koerner, P.E., Program Administrator  
Office of Permitting and Compliance

THROUGH: Syed Arif, P.E. SA 10/31

FROM: Scott M. Sheplak, P.E. sms

DATE: October 19, 2011

SUBJECT: Lee County Department of Solid Waste Management  
Lee County Resource Recovery Facility  
Intent to Issue Package  
Title V Air Operation Permit Renewal  
*Revised* Draft/Proposed Permit No. 0710119-007-AV  
Air Construction Permit Revision  
Draft Permit No. 0710119-008-AC/PSD-FL-151E  
**Permitting Clock:** Today is ARMS Day 6; Day 90 = 01/12/2012

Attached for your review are the following documents:

- Cover Letter;
- Written Notice of Intent to Issue Air Permits with Public Notice of Intent to Issue Air Permits;
- P.E. Certification Statement for Air Construction Permit Revision;
- Technical Evaluation and Preliminary Determination;
- Draft Air Construction Permit Revision;
- P.E. Certification Statement for Title V Air Operation Permit;
- Statement of Basis; and,
- *Revised* Draft/Proposed Title V Air Operation Permit.

The renewal application was received via Electronic Permit Submittal and Processing System (EPSAP). The applicant also requested the concurrent processing of an air construction permit revision to change miscellaneous underlying air construction (AC)/PSD permit conditions. The applicant certified compliance in the Title V air operation permit renewal application. Review of the Department's Air Compliance and Enforcement Search (ACES) on October 18, 2011 indicates that the facility is in compliance.

We issued (clerked) a draft/proposed Title V air operation permit renewal on March 18, 2011; the applicant never published the public notice. On May 24, 2011, we received about 12 pages of comments from the applicant which resulted in substantial changes to the draft/proposed Title V air operation permit renewal. Some of the requested changes required changes to underlying AC/PSD permit conditions. The applicant subsequently applied on July 22, 2011 for the AC/PSD permit revision. To my knowledge these permits contain appropriate changes to either the applicant's satisfaction or to their understanding. This Title V air operation permit renewal application therefore in my opinion is not controversial and is routine. I do not anticipate any more significant comments. Parallel (combined), e.g., draft/proposed, processing is recommended.

This permit contains versions of the recently developed engine templates in Florida.

I recommend approval of the permits.

Attachments  
SA/sms