



Florida Department of

Environmental Protection

Memorandum

TO: Joseph Kahn, Director, DARM
THROUGH: Trina L. Vielhauer, Chief, BAR
FROM: A.A. Linero, P.E., PA/Cindy Mulkey South Permitting Section
DATE: February 7, 2007
SUBJECT: Lee County Resource Recovery Facility
Unit 3 MWC Construction Extension
DEP File No. 0710119-005-AC, PSD-FL-151D

Attached is the final permit package for extension of the Lee County Resource Recovery Facility Unit 3 construction permit expiration date. The current construction permit (PSD-FL-151C) expired on December 31, 2006. The applicant has incurred unforeseen problems related to procurement of construction contracts and equipment. Lee County has requested to extend the expiration date to December 31, 2007. The facility has provided recent construction details and assurance that construction and testing will be completed by this time.

Comments received from Lee County during the 14-day comment period have been addressed in the attached Final Determination to Issue a Construction Permit.

We recommend your approval of the attached Final Notice and Permit.

AAL/cm

Attachments

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an
Application for Permit by:


Lindsey J. Sampson, Director
Lee County Solid Waste Division
Post Office Box 3193
Orlando, Florida 32802

Lee County Resource Recovery Facility
Unit 3 Municipal Waste Combustor
DEP File No. 0710119-005-AC
PSD-FL-151D

Enclosed is the Final Permit (No. 0710019-005-AC) to extend the construction period for the Unit 3 Municipal Waste Combustor to December 31, 2007 at the Lee County Resource Recovery Facility. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) and all copies were sent electronically (with Received Receipt) before the close of business on 2/12/07 to the persons listed:

D. Castro, HDR Engineering, Inc.: dcastro@hdrinc.com

K. Dunbar, HDR Engineering, Inc.: kirk.dunbar@hdrinc.com

Jon Iglehart, DEP South District: jon.iglehart@dep.state.fl.us

Mike Halpin, Siting: mike.halpin@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

Mary J. Harvey 2/12/07
(Clerk) (Date)



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:

Lee County
Post Office Box 398
Fort Myers, Florida 33902-0398

Authorized Representative:

Lindsey J. Sampson
Director, Solid Waste Division

Lee County Resource Recovery Facility
Unit 3 MWC and Lime Silo
DEP File No. 0710119-005-AC
PSD-FL-151D
Expires: December 31, 2007

PROJECT AND LOCATION

This permit incorporates all conditions from the latest Air Construction Permit (PSD-FL-151C, 0710119-002-AC), excluding Appendix BD, and extends the expiration date by one calendar year. The permit authorizes construction of a third municipal waste combustor, and a lime storage silo and associated equipment at the existing resource recovery facility. The municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 tons per day and maximum heat input of 291.5 million Btu per hour. The facility is located at 10500 Buckingham Rd., Fort Myers, Lee County.

STATEMENT OF BASIS

This permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to perform the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

The following are attached as part of this permit.

Final Permit	PSD-FL-151C
Appendix GC	General Conditions



Joseph Kahn, Director
Division of Air Resource Management

SECTION I. GENERAL INFORMATION

FACILITY DESCRIPTION

The existing facility consists of a municipal waste combustion plant with two mass burn municipal waste combustion units. The facility currently has a capacity of 660 tons/day per unit for a total of 1,320 tons per day of solid waste fuel with a nominal higher heating value of 5,000 Btu per pound. This is equal to a maximum heat input of 275 million Btu per hour per unit, for a total heat input not to exceed 550 million Btu per hour. The facility converts solid waste into saleable energy. It produces up to 40 megawatts of electricity. The facility is self-sufficient and operates on a small portion of the power it generates. The remaining electricity is sold to an electric utility market. The facility is owned by Lee County, and was designed, built and is currently operated by Ogden-Martin Systems of Lee, Inc. (although the corporate name changed to Covanta Energy Corporation, effective March 14, 2001). The Lee County Resource Recovery Facility began operation in August 1994.

The facility's existing mass burn combustion system incorporates the technology of German-based Martin GmbH. The waterwall furnaces are equipped with Martin® reverse-reciprocating grates and ash handling systems. Waste is combusted and reduced to an inert ash residue. Each existing unit is equipped with a slaked lime scrubber followed by a baghouse, a selective non-catalytic reduction system for reduction of nitrogen oxide emissions, and a carbon injection system for control of mercury emissions.

PROJECT DESCRIPTION

This permit extends the expiration date of the previously issued permit (No. PSD-FL-151C, 0710119-002-AC) which allowed the applicant to construct a third municipal waste combustion unit (Unit 3), which is substantially similar to the existing two units. Unit 3 will have additional controls in order to comply with the more stringent New Source Performance Standards and Best Available Control Technology limits. The new municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 tons per day and maximum heat input of 291.5 million Btu per hour. Accordingly, as a large municipal waste combustor, this unit is subject to the requirements of the Code of Federal Regulations Title 40, Part 60 (40 CFR 60), Subpart Eb. Dry flue gas scrubbers, baghouse, selective non-catalytic reduction, and carbon injection will be utilized to control emissions from the combustor. Flue gas recirculation is authorized but not required. The existing facility also contains existing lime silo and ash handling systems, which will be impacted via increased throughput of the new unit. An additional lime silo will be constructed, which stores pebble lime, used to make lime slurry.

EMISSIONS UNITS

This permit addresses the following emissions units:

EU ID	Emissions Unit Description
006	Unit 3 660 Tons per day nominal MSW Incinerator
007	Lime Silo

REGULATORY CLASSIFICATION

Title I, Part C, Clean Air Act (CAA): The facility is a PSD-major facility pursuant to Rule 62-212, F.A.C.

Title I, Section 111, CAA: Unit 3 is subject to the New Source Performance Standards of 40 CFR 60, Subpart Eb-Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994.

Title I, Section 112, CAA: The facility is a "Major Source" of hazardous air pollutants.

Title IV, CAA: The facility does not operate units subject to the Acid Rain provisions of the Clean Air Act.

Title V, CAA: The facility is a Title V or "Major Source of air pollution" in accordance with Chapter 62-213, F.A.C.

SECTION I. GENERAL INFORMATION

PERMITTING AUTHORITY

All documents related to applications for permits to construct, operate or modify an emissions unit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall also be submitted to the Compliance Authority.

COMPLIANCE AUTHORITY

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department of Environmental Protection South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3881.

RELEVANT DOCUMENTS

The documents listed below are not a part of this permit; however, this information is specifically related to the permitting action and is on file with the Department.

- Lee County Letter dated January 16, 2007.
- Department's Final Determination issued concurrently with this Final Permit.

SECTION II. ADMINISTRATIVE REQUIREMENTS

1. **General Conditions:** The permittee shall operate under the attached General Conditions listed in Appendix GC of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 F.S. [Rule 62-4.160, F.A.C.]
2. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 F.A.C.; and the Title 40, Parts 51, 52, 60, and 63 of the CFR, adopted by reference in Rule 62-204.800, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
3. **New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
4. **Permit Expiration:** For good cause, the permittee may request that this PSD Air Construction Permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.080(3), F.A.C.]
5. **PSD Source Obligation:**
 - a. Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of Subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - c. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of Subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]
6. **Modifications:** No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an Air Construction Permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Chapters 62-210 and 62-212, F.A.C.]
7. **Title V Permit:** This permit authorizes construction or modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V Operation Permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V Operation

SECTION II. ADMINISTRATIVE REQUIREMENTS

Permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V Operation Permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

8. Annual Operating Report: The Annual Operating Report shall be completed each year and submitted to the appropriate Department division, district or Department-approved local air pollution control program office by March 1st of each year. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370, F.A.C.]

SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS

EU 006 and 007 MSW Incinerator and Lime Silo

This section of the permit addresses the following existing emissions units.

EU ID	Emissions Unit Description
006	Unit 3 660 Tons per day nominal MSW Incinerator
007	Lime Silo

ADMINISTRATIVE REQUIREMENTS

1. Relation to Other Permits: This permit supersedes permit, PSD-FL-151C (0710119-002-AC), dated October 13, 2003. The provisions of the Air Construction Permit PSD-FL-151C, attached, are incorporated into this Air Construction Permit with the following changes:
 - a. The expiration date is extended to December 31, 2007.
 - b. Because the requirements of Appendix BD were incorporated into the permit's terms and conditions, Appendix BD is no longer attached as part of the permit.

[Rule 62-212.300, F.A.C.]

FINAL DETERMINATION
TO ISSUE A CONSTRUCTION PERMIT
LEE COUNTY RESOURCE RECOVERY FACILITY
DEP FILE NO. 0710119-005-AC

On January 22, 2007 the Florida Department of Environmental Protection (Department) distributed an "Intent to Issue Air Construction Permit" that extended the construction period of the Unit 3 Municipal Waste Combustor at the Lee County Resource Recovery Facility to December 31, 2007.

The package included the Department's Draft Air Construction Permit, the Intent to Issue Air Construction Permit, and the Public Notice of Intent to Issue Air Construction Permit. The Department sent copies of the package to various persons and agencies. Lee County published the Public Notice in the *Fort Myers News-Press* on January 25, 2007 and provided to the Department the required proof of publication.

The Department has reasonable assurance that the project will not result in significant net emission increases from the units that would otherwise require a review under the Rules for the Prevention of Significant Deterioration (PSD) at Paragraph 62-212.400, Florida Administrative Code or 40 CFR 52.21.

No requests for administrative hearings were received on the Notice of Intent to Issue.

Written comments were received during the 14-day public comment period from the Lee County Solid Waste Division on February 06, 2007. No comments were received from other agencies or the public regarding the Draft Air Construction Permit.

Lee County's comments identified inconsistencies between specific conditions within the permit 0710119-002-AC (which is incorporated into this permit by reference) and its associated Appendix BD. A condition has been added to Section III, Emissions Units Specific Conditions clarifying that the conditions of the permit alone constitute BACT, and Appendix BD is no longer attached as part of this permit.

The final decision by the Department is to issue the permit as drafted.



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

PERMITTEE:

Lee County
Lee County Resource Recovery Facility
P.O. Box 398
Fort Myers, Florida 33902

ID No.	0710119
Permit No.	0710119-002-AC
PSD No.	PSD-FL-151C
SIC No.	4953
Expires:	December 31, 2006

Authorized Representative:

Mr. Lindsey Sampson
Director, Solid Waste Division

PROJECT AND LOCATION:

This permit allows the applicant to construct a third municipal waste combustor (MWC), along with a lime storage silo and associated appurtenances. The new MWC will be constructed at the existing municipal waste combustion facility. The municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 TPD and maximum heat input of 291.5 million Btu per hour (MMBtu/hr).

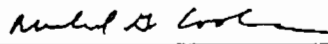
The facility is located at 10500 Buckingham Rd., Fort Myers, Lee County. The UTM coordinates of this facility are Zone 17; 424.21 km E; 2945.7 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 and Subpart Eb of the NSPS of 40CFR60. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendix is part of this permit:

Appendix GC Construction Permit General Conditions
Appendix BD BACT Determination


Michael G. Cooke, Director
Division of Air Resources
Management

"More Protection, Less Process"

Printed on recycled paper.

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION I. FACILITY INFORMATION

SUBSECTION A. FACILITY DESCRIPTION

The existing facility consists of a municipal waste combustion facility with two mass burn municipal waste combustion (MWC) units. The facility currently has a capacity of 660 tons/day per unit for a total of 1,320 tons per day of solid waste fuel with a nominal HHV of 5,000 Btu/lb. This is equal to a maximum heat input of 275 MMBtu/hour per unit, for a total heat input not to exceed 550 MMBtu/hr. The facility converts solid waste into saleable energy. It produces up to 40 MW of electricity. The facility is self-sufficient and operates on a small portion of the power it generates. The remaining electricity is sold to an electric utility market. The facility is owned by Lee County, and was designed, built and is currently operated by Ogden-Martin Systems of Lee, Inc. (although the corporate name changed to Covanta Energy Corporation, effective March 14, 2001). The Lee County Resource Recovery Facility began operation in August 1994.

The facility's existing mass burn combustion system incorporates the technology of German-based Martin GmbH. The waterwall furnaces are equipped with Martin® reverse-reciprocating grates and ash handling systems. Waste is combusted and reduced to an inert ash residue. Each existing unit is equipped with a slaked lime scrubber followed by a baghouse, an SNCR system for reduction of NO_x emissions, and a carbon injection system for control of mercury emissions.

This permit allows the applicant to construct a third MWC unit, which is substantially similar to the existing two units, albeit with additional controls as required in order to comply with the more stringent NSPS and BACT limits. The new municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 TPD and maximum heat input of 291.5 MMBtu/hr. Accordingly, as a large MWC, this unit is subject to the requirements of 40 CFR 60, Subpart Eb. Dry flue gas scrubbers, baghouse, SNCR, and carbon injection will be utilized to control emissions from the combustor. Flue Gas Recirculation (FGR) is authorized but not required. The existing facility also contains existing lime silo and ash handling systems, which will be impacted via increased throughput of the new unit. An additional lime silo will be constructed, which stores pebble lime, used to make lime slurry.

SUBSECTION B. REGULATORY CLASSIFICATION

This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212:400, Prevention of Significant Deterioration (PSD).

Project: Lee County Resource Recovery Facility
Facility ID No. 0710119
SIC: 4953

Lee County
Fort Myers, Florida

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION I. FACILITY INFORMATION

Based on the initial Title V permit application received June 17, 1996, this facility is a major source of hazardous air pollutants (HAPs).

SUBSECTION C. PERMIT SCHEDULE:

- June 13, 2003 notice of intent published in Ft. Myers News-Press
- June 12, 2003 issued revised notice of intent to issue permit
- April 14, 2003 notice of intent published in Ft. Myers News-Press
- April 4, 2003 issued notice of intent to issue permit
- February 28, 2003 application deemed complete

SUBSECTION D. RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received (Bureau of Air Regulation) on November 12, 2002
- Department's Request For Additional Information dated December 11, 2002
- Applicant's response to Department's Request and related information submitted by Lee County and its consultants (various dates)

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION A. ADMINISTRATIVE

- A.1 Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-0114. All documents related to reports, tests, and notifications should be submitted to the Department's South District Office (DEPSD), 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902 and phone number 239/332-6975.
- A.2 General Conditions: The owner and operator are subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. **[Rule 62-4.160, F.A.C.]**
- A.3 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- A.4 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. **[Rule 62-210.900, F.A.C.]**
- A.5 Application for Title V Permit: An application for a modification of the Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation and a copy to DEPSD. **[Chapter 62-213, F.A.C.]**
- A.6 New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION B. CONSTRUCTION REQUIREMENTS

- B.1 Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit (s) shall be in accordance with the capacities and specifications stated in the application. The unit is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Section 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations [Rule 62-204.800, F.A.C.]. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations [Rule 62-210.300, F.A.C.]

SUBSECTION C. OPERATIONAL REQUIREMENTS

- C.1 Changes/Modifications: The owner or operator shall submit to the Department's Bureau of Air Regulation, for review any changes in, or modifications to: the method of operation; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual short term or long term emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain, an air construction permit prior to making the desired change. [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]
- C.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the DEPSD as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
- C.3 Operating Procedures shall include good combustion practices and proper training and certification of all operators. The good combustion practices shall meet the guidelines established in 40 CFR 60, Subpart Eb and procedures as established by recognized industry standards. All operators (including supervisors) of air pollution control device shall be properly trained and certified in plant specific equipment. A list of all such certified personnel shall be submitted to the DEPSD. Department's staff shall be given notice of any formal training sessions related to operation and maintenance of air pollution control devices. [Rule 62-204.800(8), F.A.C. and 62-4.070 (3), F.A.C.]

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

- C.4 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Air Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in **Rule 62-297.620, F.A.C.**

SUBSECTION D. MONITORING OF OPERATIONS

Determination of Process Variables

- D.1 The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- D.2 Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [**Rule 62-297.310(5), F.A.C.**]

SUBSECTION E. OTHER REQUIREMENTS

- E.1 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not relieve the permittee from securing any other types of required permits, licenses, or certifications.

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. 40 CFR 60, NSPS, GENERAL PROVISIONS

The following emission limitations shall apply to the affected emissions unit after compliance testing is completed. As used in this permit, initial operations shall mean after the initial compliance testing is complete. This section addresses the following emissions unit:

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION	SYSTEM
-006	660 Tons per day nominal MSW Incinerator	MSW Unit 3

The affected emissions units shall comply with all applicable requirements of 40 CFR 60, General Provisions, Subpart A.

- A.1 [40 CFR 60.7, Notification and record keeping]
- A.2 [40 CFR 60.8, Performance tests]
- A.3 [40 CFR 60.11, Compliance with standards and maintenance requirements]
- A.4 [40 CFR 60.12, Circumvention]
- A.5 [40 CFR 60.13, Monitoring requirements]
- A.6 [40 CFR 60.19, General notification and reporting requirements]

The affected emissions units shall comply with all applicable provisions of the 40 CFR 60, Subpart Eb-Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996. In addition the emissions unit shall also comply with all the conditions listed in Section II (Emissions Unit General Requirements) of this permit.

[Rule 62-4.070(3), 62-204.800(8) and 62-296.416, F.A.C.]

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION B. SPECIFIC CONDITIONS:

The following specific conditions apply to the following emissions unit.

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
-006	660 Tons per day nominal MSW Incinerator

OPERATIONAL REQUIREMENTS

- B.1 The combustor (boiler) shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, and rated capacity.
[Rule 62-4.070(3), F.A.C.]
- B.2 Process Operating Rates: The municipal waste combustor unit (MWC) shall have a nominal rated capacity of 660 tons of waste per day. Maximum heat input shall be 291.5 MMBtu/hr.
[Rules 62-4.070(3) and 62-204.800(8), F.A.C., 40 CFR 60.51b and 60.58b(j)]
- B.3 Load Level: *Unit load* means the steam load of the municipal waste combustor (MWC) measured as specified in 40 CFR 60.58b(i)(6). Compliance with load level requirements shall be determined by a steam meter using ASME Power Test Code for Steam Generating Units, Power Test Code 4.1, section 4 (see 40 CFR 60.58b(i)(6)(ii) & (iii)). The MWC unit shall not operate at a load level greater than 110 percent of the unit's *maximum demonstrated unit load* based on 4-hour block averaged measurements of steam flow. The maximum demonstrated unit load is the highest arithmetic averaged measurement of steam flow recorded for four consecutive hours during the most recent dioxin/furan performance stack test in which compliance with the dioxin/furan emission limit was achieved. Higher loads are allowed for testing purposes as specified at 40 CFR 60.53b(b) and condition D.7 of this permit. **[Rule 62-204.800(8), F.A.C., 40 CFR 60.51b; 60.53b(b); and 60.58b(i)(6)&(8)]**
- B.4 Emission Control Equipment

Particulate Matter

The unit shall be equipped with a particulate control baghouse designed, constructed and operated so as not to exceed a maximum emission rate of 20.6 mg/dscm corrected to 7 percent O₂. The baghouse shall be equipped with pressure drop monitoring equipment.

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

Spray Dryer Scrubber

The unit shall be equipped with a spray dryer scrubber designed, constructed and operated so as to remove SO₂ at an efficiency of 80 percent, or not to exceed a maximum emission rate of 26 ppmvd corrected to 7 percent O₂ based upon a 24-hour block geometric mean, whichever is less stringent.

Carbon Injection

The unit shall be equipped with a carbon injection system. The carbon injection rate must be measured continuously and maintained in compliance with the requirements set forth in this permit as well as 40 CFR 60.58b(m).

Selective Non-Catalytic Reduction System

The unit shall be equipped with a selective non-catalytic reduction system designed, constructed and operated so as not to exceed a maximum NO_x emission rate of 150 ppmvd corrected to 7 percent O₂ on a 24-hour block arithmetic mean (midnight to midnight) as well as 110 ppmvd corrected to 7 percent O₂ on a 12-month rolling average and designed to meet 15 ppmvd @ 7% O₂ ammonia slip on a 24 hour average. Notwithstanding these requirements, the unit shall be granted a period of 12 calendar months from the initial compliance test of the MWC, in order to meet the 110 ppmvd NO_x and the 30 ppm ammonia slip limits identified within this permit. During this initial calendar year of operation, the 12-month rolling average limit for NO_x shall be 140 ppmvd @ 7% O₂ based upon the actual number of calendar months since initial operation. For each month after the initial calendar year of operation, the 12-month rolling average limitation shall be reduced by 2.5 ppmvd @ 7% O₂ until reaching the BACT limit of 110 ppmvd @ 7% O₂ on a 12-month rolling average. The ammonia slip limit shall be 50 ppmvd @ 7% O₂ for the first 12 calendar months from initial operation and shall be adjusted as set forth in paragraph B.10 (5), below. Note: Nothing in this permit shall be construed as an authorization to exceed the opacity standard specified herein.

Within 30 days after it becomes available, but before commencement of construction of the air pollution control equipment, the Permittee shall submit to the DEPSD copies of technical data pertaining to the selected emission control systems. This data should include, but not be limited to the manufacturer's guarantees, design inlet and outlet emission rates, and major design parameters. [Rule 62-4.070(3), F.A.C.]

- B.5 Stack Height: The height of the boiler exhaust stack shall not be less than 276 feet above grade (271 feet for structural stack plus 5 feet for flue).
- B.6 Fuels: The primary fuel for the unit is municipal solid waste (MSW), including the items and materials that fit within the definition of MSW contained in either 40 CFR 60.51b or

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Section 403.706(5), Florida Statutes (1995). **[Rule 62-4.070(3), F.A.C., and request of applicant]**

B.6.1 Subject to the limitations contained in this permit, the authorized fuels for the unit also include the other solid wastes that are not MSW which are described below. However, the unit shall not burn:

- (a) those materials that are prohibited by state or federal law;
- (b) those materials that are prohibited by this permit;
- (c) lead acid batteries;
- (d) hazardous waste;
- (e) nuclear waste;
- (f) radioactive waste;
- (g) sewage sludge;
- (h) explosives;
- (i) beryllium-containing waste, as defined in 40 CFR 61, Subpart C.

Further, the facility shall not knowingly burn:

- (j) nickel-cadmium batteries pursuant to Section 403.7192 (3);
- (k) mercury containing devices and lamps pursuant to Sections 403.7186(2) & (3);
- (l) untreated biomedical waste from biomedical waste generators regulated pursuant to Chapter 64E-16, F.A.C., and from similar generators (or sources); and
- (m) segregated loads of biological waste.

B.6.2 The fuel may be received either as a mixture or as a single-item stream (segregated load) of discarded materials. If the unit intends to use an authorized fuel that is segregated non-MSW material, the fuel shall be either:

- (a) well mixed with MSW in the refuse pit; or
- (b) alternately charged with MSW in the hopper.

B.6.3 The unit operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received and used as fuel at the unit, and subject to a percentage weight limitation, below (B.6.6. and B.6.7). For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of waste material, as determined by visual observation.

B.6.4 To ensure that the unit's fuel does not adversely affect the unit's combustion process or emissions, the unit operator shall:

- (a) comply with good combustion operating practices in accordance with 40 CFR 60.53b;

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- (b) install, operate and maintain continuous emissions monitors (CEMS) for oxygen, carbon monoxide, sulfur dioxide, oxides of nitrogen and temperature in accordance with 40 CFR 60.58b; and
- (c) record and maintain the CEMS data in accordance with 40 CFR 60.59b.

These steps shall be used to ensure and verify continuous compliance with the emissions limitations in this permit.

Natural gas or propane may be used as fuel during warm-up, startup, shutdown, and malfunction periods, and at other times when necessary and consistent with good combustion practices.

B.6.5 Subject to the conditions and limitations contained in this permit, the following other solid waste may be used as fuel at the unit:

- (a) Confidential, proprietary or special documents (including but not limited to business records, lottery tickets, event tickets, coupons and microfilm);
- (b) Contraband which is being destroyed at the request of appropriately authorized local, state or federal governmental agencies, provided that such material is not an explosive, a propellant, a hazardous waste, or otherwise prohibited at the unit. For the purposes of this section, contraband includes but is not limited to drugs, narcotics, fruits, vegetables, plants, counterfeit money, and counterfeit consumer goods;
- (c) Wood pallets, clean wood, and land clearing debris;
- (d) Packaging materials and containers;
- (e) Clothing, natural and synthetic fibers, fabric remnants, and similar debris, including but not limited to aprons and gloves;
- (f) Rugs, carpets, and floor coverings, but not asbestos-containing materials or polyethylene or polyurethane vinyl floor coverings; and
- (g) The predominantly combustible fraction of sorted construction and demolition debris. Sorting of mixed construction and demolition debris at the unit shall occur on the tipping floor or at another location approved by the Department.

B.6.6 Subject to the conditions and limitations contained in this permit, waste tires may be used as fuel at the unit. The total quantity of waste tires received as segregated loads and burned at the unit shall not exceed 3%, by weight, of the unit's total fuel. Compliance with this limitation shall be determined by using a calendar monthly average in accordance with specific condition B.24 below.

B.6.7 Subject to the conditions and limitations contained in this permit, the following other solid waste materials may be used as fuel at the unit (i.e. the following are authorized fuels that are non-MSW material). The total quantity of the following non-MSW material received as

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segregated loads and burned at the unit shall not exceed 5% by weight of the unit's total fuel. Compliance with this limitation shall be determined by using a calendar monthly average in accordance with specific condition B.24 below.

- (a) 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.
- (b) Oil spill debris from aquatic, coastal, estuarine or river environments. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (c) 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.
- (d) 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.
- (e) Waste materials that:
 - (i) are generated in the manufacture of items in categories (c) or (d), above and are functionally or commercially useless (expired, rejected or spent); or
 - (ii) 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.
- (f) Waste materials that contain oil from:
 - (i) the routine cleanup of industrial or commercial establishments and machinery; or
 - (ii) spills of virgin or used petroleum products. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (g) Used oil and used oil filters. Used oil containing a PCB concentration equal or greater than 50 ppm shall not be burned, pursuant to the limitations of 40 CFR 761.20(e).
- (h) 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 prior approval of the Department.

B.7 Startup/Shutdown/Malfunctions

- (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

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Department for longer duration. See also NSPS requirements set forth in paragraphs b, c and d below. [Rule 62-210.700, F.A.C.]

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

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EMISSION LIMITATIONS & STANDARDS

B.8 Emissions from the MWC unit shall not exceed the limits listed in the following table.
[BACT]

Pollutant Name	Standard(s)	Lbs/hour	TPY
Particulate Matter (PM ₁₀)	20.6 mg/dscm, corrected to 7% O ₂	5.12	22.3
MWC Metals (PM)	20.6 mg/dscm, corrected to 7% O ₂	5.12	22.3
Sulfur Dioxide (SO ₂)	26 ppm, or 80% reduction, at 7% O ₂ ⁽¹⁾	56.9	249.4
Sulfuric Acid Mist (SAM)	15 ppmvd @ 7% O ₂	15.1	66.1
Nitrogen Oxides (NO _x)	110 ppm @ 7% O ₂ - 12-month rolling avg. 140 ppm @ 7% O ₂ - 12-month rolling avg. * 150 ppm @ 7% O ₂ - 24 hour average	70.8	289.4
Carbon Monoxide (CO)	80 ppm @ 7% O ₂ - 12-mo rolling avg. 100 ppm @ 7% O ₂ - 4 hr average	23.0 28.73	100.6
Mercury (Hg)	0.028 mg/dscm @ 7% O ₂ or 85% reduction ⁽¹⁾	0.0168	0.0736
Visible Emissions (VE)	10 %, 6 minute average		
Lead (Pb)	0.2 mg/dscm, corrected to 7% O ₂	0.05	0.22
MWC Acid Gas (HCl)	25 ppm or 95% reduction @ 7% O ₂ ⁽¹⁾	46.76	204.8
Hydrogen Fluoride (HF)	3.5 ppmvd @ 7% O ₂	0.718	3.145
Cadmium (Cd)	0.02 mg/dscm @ 7% O ₂	.005	0.022
Dioxin/Furan (PCDD/F)	13 ng/dscm, corrected to 7% O ₂	3.2 x 10 ⁻⁶	1.4 x 10 ⁻⁵
Ammonia	15 ⁽²⁾ / 30 ppmvd @ 7% O ₂ 50 ppmvd @ 7% O ₂ *		

Notes to table:

* - For the 12-month calendar period following initial operation only.

Abbreviations

ug/dscm: Micrograms per dry standard cubic meter

mg/dscm: Milligrams per dry standard cubic meter

ng/dscm: Nanograms per dry standard cubic meter

ppm: Part per million dry volume

Dioxins/ furans: Total tetra through octa-chlorinated dibenzo-p-dioxins and dibenzofurans

Note (1) Whichever standard is less stringent.

Note (2) Design Standard.

[40 CFR 60.58b, Rules 62-210.200, 62-212.400 (BACT), 62-204.800(8) and 62-4.070(3), F.A.C., and request of applicant]

B.9 Auxiliary Burners: Auxiliary burners shall be fired only with natural gas or propane.
[Rule 62-4.070(3), F.A.C.]

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COMPLIANCE AND PERFORMANCE TESTING

B.10 Stack Testing

Compliance with the emission limits for visible emissions (opacity), carbon monoxide (CO), nitrogen oxides (NO_x), and sulfur dioxide (SO₂) in specific condition B.8 of this permit shall be demonstrated by continuous emission monitoring systems (CEMS) as required by specific condition B.13.

Compliance tests for the other pollutants listed in specific condition B.8 shall be performed annually (unless indicated otherwise) by using the following reference methods as described in 40 CFR 60, Appendix A and/or 40 CFR 61 Appendix B adopted by reference in Chapter 62-204, F.A.C. or any other method as approved by FDEP, in accordance with Chapter 62-297, F.A.C. Stack tests may also require Method 1, 2, 3/3A/3B and 4 tests as appropriate. Testing shall be conducted in accordance with the requirements of 40 CFR 60.58b Compliance and Performance Testing. With the exception of mercury testing, emission determinations based on stack tests shall be the average of three valid test runs pursuant to Rule 62-297.310(1), F.A.C. A test protocol shall be submitted for approval to the DEPSD at least 45 days prior to the initial testing. [Rule 62-204.800(8), F.A.C. and Chapter 62-297, F.A.C.]

- | | |
|--|---|
| Method 5 ⁽¹⁾ | Determination of Particulate Matter Emissions from Stationary Sources. |
| Method 9 | Visual Determination of the Opacity of Emissions from Stationary Sources. |
| Method 13A/B ⁽⁴⁾ | Determination of Total Fluoride Emission from Stationary Sources. |
| Method 23 ⁽²⁾ | Determination of Dioxin/Furan Conc. from Stationary Sources. |
| Method 26 ⁽³⁾
or 26A | Determination of HCl emissions. |
| Method 29 ^{(3) (4)} | Determination of Metals Emissions from Stationary Sources. |
| Method CTM-027 ⁽⁵⁾ | Conditional Test Method for Collection and Analysis of Ammonia. |

- (1) Pursuant to 40 CFR 60.58b(c)(3) EPA Reference Method 5 shall be used for determining compliance with the particulate matter emission limit. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 ± 14 °C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run. Since the limit for MWC Metals (as PM) is identical to the limit for PM₁₀, one annual test may suffice in determining compliance with both limits.

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- (2) Dioxin/Furan emission limit expressed as the total mass of tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans. The unit may perform less frequent testing for dioxin/furan emissions, as allowed by 40 CFR 60.38b(b) and 60.58b(g)(5)(iii) and (6) with prior notice to the Department, if the unit's dioxin/furan emissions do not exceed 7 ng/dscm corrected to 7% O₂ and if the existing two MWC units' dioxin/furan emissions do not exceed 15 ng/dscm each, corrected to 7% O₂.
 - (3) SO₂, Mercury and HCl stack tests upstream and downstream of the control device(s) shall be conducted to calculate percent control. Demonstration of the SO₂ emission limit shall be used as a surrogate for determining compliance with the SAM emission limit.
 - (4) The mercury emission rate shall be limited to no more than 0.028 mg/dscm at 7% O₂ or an 85% reduction (whichever is less stringent) based upon three valid test runs (annually) pursuant to Rule 62-297.310(1), F.A.C. However, the applicant may eliminate one test run per year in the event that the single run yields an inlet Hg concentration above 0.450 mg/dscm at 7% O₂, and the carbon injection system can be shown to have been operating properly. In the alternative, the applicant may retest within 30 days after receiving test results showing that the inlet Hg concentration was above 0.450 mg/dscm at 7% O₂ in two or more test runs, provided the applicant demonstrates that the carbon injection system was working properly during the test runs.
 - (5) The ammonia slip rate shall be initially established for a 12-month period at 50 ppmvd @ 7% O₂ and based upon quarterly stack test results. Thereafter, the ammonia slip rate shall be established at 30 ppmvd @ 7% O₂ based upon quarterly stack test results. However, if the ammonia CEMS demonstrates that the quarterly ammonia slip average for the calendar quarter preceding the scheduled quarterly test is 15 ppmvd @ 7% O₂ or less, then CEMS data shall substitute for the required quarterly stack test.
- B.11. Test Procedures: Compliance tests shall meet all applicable requirements (i.e., testing frequency, minimum compliance duration, etc.) of Chapter 62-297, F.A.C. The Method 9 test shall be conducted during one run of the particulate matter test. The particulate matter test shall be conducted under conditions representative of normal operations and at least one test run shall be conducted during a normal (soot blowing) cycle. Initial performance tests for SO₂, CO and NO_x shall be conducted using CEMS in accordance with the methods and requirements of 40 CFR 60.58b(e)(4), (h)(3) and (i)(3) respectively. Simultaneous CEMS data for NO_x shall be submitted with the quarterly ammonia stack test data and results. All test reports shall include the information required by 40 CFR 60.59b(f). [Rules 62-4.070(3), 62-297.310 and 62-204.800(8), F.A.C.; 40 CFR 60.58b and 40 CFR 60.59b]

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- B.12 Stack Testing Facilities: The owner or operator shall install stack testing facilities in accordance with Rule 62-297.310(6), F.A.C. The owner or operator shall provide ports in the air pollution control equipment outlet duct or stack and shall provide access to the sampling ports. [Rule 62-297.310(6)(c), F.A.C.]

MONITORING OF OPERATIONS

- B.13 Continuous Monitoring: Compliance with the emission limits for carbon monoxide (CO), nitrogen oxides (NO_x) and sulfur dioxide (SO₂) in specific condition B.8 of this permit shall be demonstrated by continuous emission monitoring systems (CEMS) operated in accordance with the requirements of 40 CFR 60.58b. Oxygen (O₂), and opacity shall be monitored by continuous monitoring systems. Monitors for sulfur dioxide and oxygen shall be located both upstream of the dry scrubber and downstream of the baghouse in order to calculate percentage removal efficiency. A CEMS shall be installed for the purpose of measuring ammonia slip from this emissions unit (with a range of 100ppm), and used for informational purposes rather than continuous compliance (other than as allowed for in specific condition B.10). For purposes of the RATA, this CEMS shall be compared to CTM-027. All continuous monitoring systems shall be installed, calibrated, maintained and operated as required by 40 CFR 60.13 and shall conform to all applicable Performance Specifications in 40 CFR 60, Appendix B. Quality assurance procedures shall conform to all applicable sections of 40 CFR 60, Appendix F. Initial performance evaluations shall be completed within 180 days after initial startup of the unit. Data on continuous monitor equipment specifications, manufacturer, type, calibration and maintenance needs, and proposed locations shall be provided to the DEPSD for review at least 90 days prior to installation. [Rules 62-4.070(3) and 62-204.800(8), F.A.C.; 40 CFR 60.58b]
- B.14 Continuous Load Monitoring: The owner or operator shall install, calibrate, maintain, and operate a steam flow meter, measure steam flow in kilograms (or pounds) per hour on a continuous basis, and record the output of the monitor (in accordance with the ASME method described in 40 CFR 60.58b(i)(6)). Steam flow shall be calculated in 4-hour block arithmetic averages. Higher loads are allowed for testing purposes pursuant to 40 CFR 60.53b(b). [Rule 62-204.800(8), F.A.C., 40 CFR 60.51b; 60.53b(b); and 60.58b(i)(6)]
- B.15 Charging Rate Monitoring: The average daily solid waste charging rate shall be determined on a monthly basis and recorded for the MWC unit. The daily charging rate shall be determined each month on an average daily basis for the MWC unit using the facility's truck scale weight data, refuse pit inventory data and MWC operating data for the preceding calendar month. Monthly truck scale weight records of the weight of solid waste received and processed at the unit, and refuse pit inventory data, shall be used to determine the amount of solid waste charged during the preceding calendar month on an average daily basis. The MWC load level measurements or other operating data shall be

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used to determine the number of operating hours for each day during the preceding calendar month. [Rules 62-204.800(8) and 62-4.070(3), F.A.C.]

- B.16 Compliance with the PM Control Device Temperature: The MWC unit is required to continuously monitor and record the flue gas temperature at the inlet to the PM control device in accordance with the requirements at 40 CFR 60.58b(i)(7). The PM control device temperature shall be calculated in 4-hour block arithmetic averages. The MWC unit shall be allowed to operate up to 17°C (30° F) above the unit's maximum demonstrated PM control device temperature. The maximum demonstrated PM control device temperature is the highest 4-hour arithmetic measurement of temperature at the inlet to the PM control device recorded for 4 consecutive hours during the most recent dioxin/furan performance test which complied with the limits given above. The PM control device inlet temperature and the steam flow for the unit during the stack test shall be continuously monitored and recorded in accordance with 40 CFR 60, Subpart Eb. Higher temperatures are allowed for testing purposes, as specified at 40 CFR 60.53b(c). [Rule 62-204.800(8), F.A.C., 40 CFR 60.53b(c) and 60.58b(i)(7) and (9)]
- B.17 Carbon Injection Rate: The optimal carbon injection rate in pounds-per hour shall be determined preceding and during the initial compliance test. Optimization should be based upon the maximum expected mercury inlet concentrations as well as necessary operating parameters such as the screw feeder speed, hopper volume, hopper refill frequency, or other parameters appropriate to the feed system being employed. During operation of the MWC unit, the carbon injection system shall be provided with a continuous indication of the injection rate and the carbon mass feed rate must equal or exceed the level which was determined as optimal. The owner or operator shall estimate the total carbon usage for the unit for each calendar quarter by utilizing the measured carbon mass feed rate (lb/hr) for each hour of operation of the MWC unit based on the continuous indicator for carbon mass feed rate, and the total number of operating hours of operation during the calendar quarter. [Rule 62-204.800(8), F.A.C. and 40 CFR 60.58b(m)]
- B.18 Continuous Monitors: Continuous monitors with recorders shall be installed, calibrated, maintained and operated for the unit subject to review by the DEPSD for the following operational parameters:

Total steam production (mass/hr, pressure and temperature)

Carbon injection system feed rate (kg/hr or lb/hr)

Particulate matter control device inlet temperature

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

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RECORD KEEPING AND REPORTING REQUIREMENTS

B.19 Reports and Records:

All measurements, records and other data (test reports, etc.) required to be maintained by this facility shall be retained for at least five (5) years following the date on which such measurements, records and other data are recorded. Such records shall be maintained at the facility and shall include but not be limited to the items listed below. These records shall be made available upon request to the DEPSD for inspection at the facility. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., 40 CFR 60.59b]

- (a) Data collected from all monitoring instruments, including continuous monitoring systems, steam flow measurements and PM control device temperatures;
- (b) Continuous steam flow records on a 4-hour block average basis;
- (c) Records of daily solid waste charging rates and hours of operation derived from monthly truck scale data, refuse pit inventory, and operational records;
- (d) Results of all source tests or performance tests; and records of the maximum demonstrated unit load specified by condition B.3 of this permit.
- (e) Amounts of activated carbon used for emissions control;
- (f) Calibration logs for all instruments subject to this permit;
- (g) Maintenance/repair logs for any work performed which is subject to this permit;
- (h) Records showing the names of facility personnel who have been provisionally or fully certified, and who have completed the MWC operator training course, and who have completed reviews of the operating manual, including the dates and documentation of certification/review.
- (i) Records demonstrating compliance with the percentage limitations on segregated solid wastes required by specific condition B.24 of this permit.

B.20 Excess Emission Reports:

B.20.1 Quarterly Reports:

The owner or operator shall submit excess emission reports for any calendar quarter during which there are excess emissions from the unit pursuant to 40 CFR 60.7(c). If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report quarterly stating that no excess emissions occurred during the quarterly reporting period. The report shall include the following:

- (a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each period of excess emissions. [40 CFR 60.7(c)(1)]

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- (b) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measures adopted. [40 CFR 60.7(c)(2)]
- (c) The date and time identifying each period during which the continuous monitoring system (CEM/COM) was inoperative except for zero and span checks, and the nature of the system repairs or adjustments. [40 CFR 60.7(d)(2) as applicable]
- (d) When no excess emissions have occurred or the continuous monitoring system (CEM/COM) has not been inoperative, repaired, or adjusted, such information shall be stated in the report. [40 CFR 60.7(c)(4)]

B.20.2 Other Excess Emission Reports:

In case of excess emissions resulting from malfunctions*, the owner or operator shall notify the DEPSD in accordance with Section 62-4.130, F.A.C. The DEPSD shall be notified within one working day excluding weekends and holidays of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the DEPSD may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the DEPSD.

* Malfunction is defined at Rule 62-210.200, F.A.C. to mean any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.
[Rules 62-4.130 and 62-210.700(6), F.A.C.]

- B.21 Continuous Emission Monitoring System Reports: For CEM and other monitoring systems required by this permit, data on monitoring equipment specifications, manufacturer, type, calibration and maintenance needs, and proposed sampling location shall be provided to the DEPSD for review at least 90 days prior to installation.
[Rule 62-4.070(3), F.A.C.]
- B.22 Operating Reports: Before March 1st of each year, the owner or operator shall submit to the DEPSD the Annual Operating Report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year.

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No later than February 1st of each year, the owner or operator shall submit an annual report for the previous calendar year including the information required by 40 CFR 60.59b(g)(1) through (4), as applicable.

In addition, if applicable, the owner or operator shall submit to the DEPSD the information required in 40 CFR 60.59b(h) on a semiannual basis.

[Rule 62-210.370(3), F.A.C. and 40 CFR 60.59b(g) and, if applicable, 40 CFR 60.59b(h)]

B.23 Sampling Reports: Drawings of testing facilities including sampling port locations as required by Section 62-297.310(8)(c) shall be submitted to the DEPSD for review at least 60 days prior to construction of the sampling ports.

B.24 Segregated Solid Waste Record Keeping: The following records shall be made and kept to demonstrate compliance with the segregated non-MSW percentage limitations of specific condition B.6.6 and B.6.7:

Each segregated load of non-MSW materials, that is subject to the percentage weight limitations of specific condition B.6.6 and B.6.7, which is received for processing shall be documented as to waste description and weight. The weight of all waste materials received for processing shall be measured using the facility truck scale and recorded.

Each day the total weight of segregated tires received shall be computed, and the daily total shall be added to the sum of the daily totals from the current month. The resultant weight of tires at the end of each calendar month (excluding tires stored at the waste tire processing facility) shall be divided by the total weight of all waste materials received during each calendar month, and the resultant number shall be multiplied by 100 to express the ratio as a percent. The percentage computed shall be compared to the 3% limitation.

Each day the total weight of segregated non-MSW materials received that are subject to the 5% restriction (restricted materials) shall be computed, and the daily total shall be added to the sum of the daily totals of the current month. The resultant total weight of restricted materials at the end of each calendar month shall be divided by the total weight of all waste materials received during each calendar month, and the resultant number shall be multiplied by 100 to express the ratio as a percent. The percentage computed shall be compared to the 5% limitation.

Subsequent to an initial test burn scheduled to allow Department representatives to observe, while firing 5% (by weight) tires at the combustion unit while operating the unit at capacity that demonstrates via the CEMS that the unit can comply with the emission limits for pollutants monitored by the CEMS while firing 5% (by weight) tires, this

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

quantity limitation shall rise from 3% to 5%. Compliance with this limitation shall be determined on a calendar monthly basis.

B.25 Heat Input Reporting Requirements. The owner or operator shall submit to the DEPSD notification of the date of initial startup as provided by 40 CFR 60.7. Such notification shall include the design heat input capacity of the affected unit, and the annual capacity factor at which the owner or operator anticipates operating the unit based on the fuels fired.

[40 CFR 60.59b(b)]

B.26 Report of Vendor and Equipment Selection. Within 60 days of selection of a primary vendor for this project, a report detailing the design features of the MWC equipment to be installed shall be submitted to the DEPSD. Such report shall include the nominal and maximum design capacities of the furnace, grates and boiler, and shall detail operating rates such as heat input, steam production, mass throughput and turndown capability.

[Rule 62-4.070(3), F.A.C.]

OPERATOR TRAINING AND CERTIFICATION

B.27 Requirements

(a) One of the following persons must be on duty at the facility at any time during which the MWC unit is operating: a fully certified chief facility operator or shift supervisor; or a provisionally certified chief facility operator or shift supervisor who is scheduled to take the full certification exam according to the schedule specified in Specific Condition III.B.27(b). This requirement shall take effect 6 months after the date of startup of the unit. If this person must leave the facility during his or her operating shift, a provisionally certified control room operator who is on site may fulfill this requirement. A qualified, provisionally certified control room operator may temporarily replace the fully certified shift supervisor during specific periods when the certified shift supervisor is excused from work due to vacation or illness and after notification to the Department's South District Office. [40 CFR 60.54b(c)]

(b) No later than the date 6 months after the date of startup of the unit, each chief facility operator and shift supervisor shall obtain and maintain a current provisional operator certification and be scheduled for a full certification exam, or receive a full certification, from either the ASME or an equivalent State-approved certification program. [40 CFR 60.54b(a) and (b)]

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- (c) Each chief facility operator, shift supervisor, and control room operator must complete the EPA or State approved MWC operator training course no later than 6 months after the date of startup of the unit. **[40 CFR 60.54b(d)]**

- (d) A site-specific operating manual shall be developed and updated on an annual basis which meets the requirements of 40 CFR 60.54b(e). A training program shall be established to review the operating manual with each person who has responsibilities affecting the operation of the MWC including but not limited to chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers. Each person must undergo initial training no later than the date 6 months after the date of startup of the unit or the date prior to the day that person assumes responsibilities affecting operation of the facility, whichever is later, and annually thereafter pursuant to 40 CFR 60.54b(f). The operating manual must be kept in a readily accessible location for all persons required to undergo training. **[40 CFR 60.54b(e), (f) and (g)]**

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION C. SPECIFIC CONDITIONS:

The following specific conditions apply to the indicated emissions unit.

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
-007	Lime Silo
(existing)	Ash and Carbon Handling

EMISSION LIMITATIONS

C.1 Lime & Carbon Silos and Ash Handling System:

Particulate emissions from these emissions units shall be limited as follows:

- (a) PM emissions from the lime storage silo shall be controlled by a baghouse. Visible emissions shall not exceed 5% opacity in accordance with specific condition C.3.
- (b) PM emissions from the activated carbon storage silo exhaust shall be controlled by a baghouse. Visible emissions shall not exceed 5% opacity in accordance with specific condition C.3.
- (c) Visible emissions from the ash conveyor systems, transfer points, buildings, or enclosures of ash conveying systems shall not occur more than 5 percent of the time during the observation period, except during times of maintenance or repair of these systems.
- (d) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. The ash handling facilities shall be enclosed. Residue from the grates, grate siftings, and ash from the combustor/boiler and fabric filter hoppers during normal operations shall be discharged into the ash quenching system, or otherwise handled in a manner to minimize visible dust. The ash/residue in the ash handling building shall remain sufficiently moist to prevent dust during storage and handling operations.

[Rule 62-4.070(3), F.A.C., and 40 CFR 60.55b]

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

COMPLIANCE AND PERFORMANCE TESTING

- C.2 Fugitive Emissions Compliance: The compliance method for the ash handling facilities shall be EPA Method 22, Visual Determination of Fugitives Emissions From Material Sources.
- (a) The minimum observation time will be three hours, and will include periods when ash is being transferred from the MWC unit to the storage area, and when ash is being loaded for disposal.
- (b) Compliance testing shall be conducted within 180 days of completion of construction and initial operation and annually thereafter.
[Rule 62-4.070(3), F.A.C., and 40 CFR 60.55b]
- C.3. Carbon and Lime Storage Silos PM Compliance Requirements: Compliance testing for the lime and carbon silos shall be conducted within 180 days of completion of construction and initial operation and annually thereafter. The visible emission tests shall be performed for each silo during filling operations using EPA Method 9. Permanent stack testing facilities are not required for the lime and carbon silos. The owner or operator may install temporary stack sampling facilities to conduct such a test, if required.
[Rule 62-297.620(4), F.A.C.]

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION D. COMMON CONDITIONS:

The following specific conditions apply to the following emissions units.

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
-006	660 Tons per Day nominal MSW Incinerator
-007	Lime Silo
(existing)	Ash and Carbon Handling

OPERATIONAL REQUIREMENTS

- D.1 These emissions units are allowed to operate continuously (8760 hours/year).
[Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE)]
- D.2. Odor Control: No objectionable odors are allowed from this facility. The truck access doors to the unit shall remain closed except during normal working shifts when MSW is being received at the storage pit area. To minimize odors at the unit, a negative pressure shall be maintained on the tipping floor and air from within the building will be used as combustion air. [Rule 62-296.320(2), F.A.C.]
- D.3 Startup/Shutdown/Malfunctions
- (a) In order to minimize excess emissions during startup/shutdown/malfunction these emissions units shall adhere to best operational practices to minimize emissions.
- The duration of excess emissions from the lime silo or the carbon silo shall be minimized but in no case exceed 2 hours per 24 hour period.
[Rule 62-210.700, F.A.C.]
- (b) 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.]
- (c) Within 90 days prior to completion of construction of the unit, the owner or operator shall submit to the DEPSD an operational procedures manual that identifies and describes best operational practices that will be used during startup, shutdown, and malfunctions.

EMISSION LIMITATIONS

Project: Lee County Resource Recovery Facility
Facility ID No. 0710119
SIC: 4953

Lee County
Fort Myers, Florida

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- D.4 Facility Fugitive (Unconfined) Emissions: Fugitive emissions at this facility shall be adequately controlled at all times. All roads shall be adequately paved, and vacuum swept if appropriate, to minimize accumulations of ash and dust. Speed limit signs shall be posted. Unprocessed refuse storage areas which must be open for operational purposes (e.g., tipping floor or the refuse bunker while trucks are entering and leaving) shall be under negative air pressure. **[Rule 62-296.320(4)(c), F.A.C.]**

COMPLIANCE AND PERFORMANCE TESTING

- D.5 Test Notification: The owner or operator shall notify the DEPSD in writing at least *30 days* (for the initial test) and *15 days* (for the annual tests) prior to each scheduled compliance test to allow witnessing. The notification shall include the compliance test date, place of such test, the expected test time, the facility contact person for the test, and the person or company conducting the test. The 30 or 15 day notification requirement may be waived at the discretion of the DEPSD. Likewise, if circumstances prevent testing during the test window specified for the emissions unit, the owner or operator may request an alternate test date before the expiration of this window. **[Rule 62-297.310, F.A.C. and 40 CFR 60.8]**
- D.6 Special Compliance Tests: When the Department, after investigation, has good reason (such as substantiated complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the DEPSD. **[Rule 62-297.310(7)(b), F.A.C.]**
- D.7 Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit in operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. See also specific conditions B.2 and B.3 of this permit for limitations related to unit load for the MWC unit. Higher loads are allowed for testing purposes as specified at 40 CFR 60.53b(b) and condition B.3 of this permit. **[Rule 62-297.310(2) and (2)(b), F.A.C., and 40 CFR 60.53b(b)]**

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

RECORD KEEPING AND REPORTING REQUIREMENTS

D.8 Emission Compliance Stack Test Reports:
[Rule 62-297.310(8), F.A.C., and 40 CFR 60.59b(f)]

- (a) A *test report* indicating the results of the required compliance tests shall be filed with the DEPSD as soon as practical, but no later than 60 days after the last sampling run is completed.
- (b) The *test report* shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology (X)
 - b) Determination of Prevention of Significant Deterioration (X); and
 - c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Adams, Patty

From: Harvey, Mary
Sent: Monday, February 12, 2007 4:00 PM
To: Adams, Patty
Subject: FW: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

From: Castro, Don [<mailto:Don.Castro@hdrinc.com>]
Sent: Monday, February 12, 2007 3:58 PM
To: Harvey, Mary
Subject: Read: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

Your message

To: Don.Castro@hdrinc.com
Subject:

was read on 2/12/2007 3:58 PM.

Adams, Patty

From: Harvey, Mary
Sent: Monday, February 12, 2007 2:45 PM
To: Cascio, Tom; Adams, Patty
Subject: FW: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

From: Dunbar, Kirk [<mailto:Kirk.Dunbar@hdrinc.com>]
Sent: Monday, February 12, 2007 2:44 PM
To: undisclosed-recipients
Subject: Read: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

Your message

To: Kirk.Dunbar@hdrinc.com
Subject:

was read on 2/12/2007 2:44 PM.

Adams, Patty

From: Harvey, Mary
Sent: Monday, February 12, 2007 1:29 PM
To: 'dcastro@hdrinc.com'; 'kirk.dunbar@hdrinc.com'; Iglehart, Jon; Halpin, Mike
Cc: Mulkey, Cindy; Adams, Patty; Gibson, Victoria
Subject: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL
Attachments: 0710119.005.AC.F_pdf.zip

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Harvey, Mary
Sent: Monday, February 12, 2007 1:52 PM
To: Mulkey, Cindy; Adams, Patty
Subject: FW: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

From: Iglehart, Jon
Sent: Monday, February 12, 2007 1:52 PM
To: Harvey, Mary
Subject: Read: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

Your message

To: 'dcastro@hdrinc.com'; 'kirk.dunbar@hdrinc.com'; Iglehart, Jon; Halpin, Mike
Cc: Mulkey, Cindy; Adams, Patty; Gibson, Victoria
Subject: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL
Sent: 2/12/2007 1:29 PM

was read on 2/12/2007 1:52 PM.

Adams, Patty

From: Harvey, Mary
Sent: Monday, February 12, 2007 1:52 PM
To: Mulkey, Cindy; Adams, Patty
Subject: FW: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

From: Halpin, Mike
Sent: Monday, February 12, 2007 1:51 PM
To: Harvey, Mary
Subject: Read: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL

Your message

To: 'dcastro@hdrinc.com'; 'kirk.dunbar@hdrinc.com'; Iglehart, Jon; Halpin, Mike
Cc: Mulkey, Cindy; Adams, Patty; Gibson, Victoria
Subject: LEE COUNTY RESOURCE RECOVERY FACILITY -PROJECT #0710119-005-AC-FINAL
Sent: 2/12/2007 1:29 PM

was read on 2/12/2007 1:51 PM.



LEE COUNTY
SOUTHWEST FLORIDA
BOARD OF COUNTY COMMISSIONERS

RECEIVED

FEB 09 2007

BUREAU OF AIR REGULATION

Bob Janes
District One

February 8, 2007

A. Brian Bigelow
District Two

Ray Judah
District Three

Tammy Hall
District Four

Frank Mann
District Five

Mr. Al Linero, Fl. Dep't. of Environmental Protection
c/o Patty Adams, Air Division
111 S. Magnolia, Suite 23
Tallahassee, FL 32301

VIA Overnight Delivery

Donald D. Stilwell
County Manager

Subject: Affidavit of Publication of Notice of Intent to Issue PSD -F1-151D

David M. Owen
County Attorney

Dear Mr. Linero:

Diana M. Parker
County Hearing Examiner

Attached please find the subject Affidavit from the Ft. Myers News-Press. I apologize for any confusion on this matter, but we have not previously received the affidavit in the mail from the newspaper. On February 1, 2007 we sent you the actual newspaper column of the NOI. On Friday, 2/2/07 we faxed you a (faxed) copy of the affidavit, but then yesterday, I noticed that that affidavit showed the wrong "published date".

Today, I stopped at the newspaper's office and received an original affidavit with the correct "published date" (i.e., January 25, 2007) shown, along with a letter from the News-Press explaining its error. They also gave me a copy of the original advertisement "Order Confirmation" indicating the correct publishing date. Copies of all of these documents are attached hereto.

Again, I apologize for any confusion regarding this item. If you have any questions, please call me at 239-338-3302.

Sincerely,

Lindsey J. Sampson, Director
Solid Waste Division

Cc: D. Castro, HDR
File, PSD

S:\WTE EXPANSION\DEP CONST SUBMITTALS\DEP PSD PUBLIC NOI AFFDAVIT.DOC

RECEIVED

FEB 09 2007

BUREAU OF AIR REGULATION

Gladys D. Vanderbeck
Legal Advertising Coordinator
The News-Press
2442 Dr. Martin Luther King Jr. Blvd.
Fort Myers, Florida 33901

February 8, 2007

Mr. Sampson
Director of Solid Waste
10500 Buckingham Road
Fort Myers, FL 33905

Dear Mr. Sampson:

In regards to the "Affidavit of Publication" that was issued for your ad number 1154714, that ran on January 25, 2007, did indeed contain the wrong publication date. The ad ran as indicated on the new "Affidavit of Publication" on January 25, 2007 as indicated on the attached "Affidavit of Publication", Confirmation of Publication, and a complete tearsheet showing the ad number and date.

I am sorry for any inconvenience this situation may have caused. I look forward to continuing our busy association with your Lee County Solid Waste Division and The News-Press.

Sincerely,



Gladys D. Vanderbeck
Legal Advertising Coordinator

Attachments

NEWS-PRESS

Published every morning - Daily and Sunday

Fort Myers, Florida

Affidavit of Publication

STATE OF FLORIDA
COUNTY OF LEE

Before the undersigned authority, personally appeared

Kathy Allebach

who on oath says that he/she is the

Legal Assistant

of the News-Press, a

daily newspaper, published at Fort Myers, in Lee County, Florida; that the attached copy of advertisement, being a

Notice of Action

In the matter of

Permit No. PSD-FL-151D

in the court was published in said newspaper in the issues of

January 25, 2007

Affiant further says that the said News-Press is a paper of general circulation daily in Lee, Charlotte, Collier, Glades and Hendry Counties and published at Fort Myers, in said Lee County, Florida and that said newspaper has heretofore been continuously published in said Lee County, Florida, each day, and has been entered as a second class mail matter at the post office in Fort Myers in said Lee County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this

8th day of February, 2007 by

Kathy Allebach

personally known to me or who has produced

as identification, and who did or did not take an oath.

Notary Public

Print Name

My commission expires

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Permit No. PSD-FL-151D
DEP File No. 0710119-005-AC
Lee County Resource Recovery Facility
Municipal Waste Combustor Unit 3

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to Lee County. A third municipal waste combustor and a lime storage silo and associated equipment are currently under construction at the existing Lee County Resource Recovery Facility. The purpose of this construction permit is to extend the construction period one calendar year. This permit incorporates all conditions from the latest air construction permit (PSD-FL-151C, 0710119-002-AC) which authorizes construction of Unit 3. The municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 tons per day and maximum heat input of 291.5 million Btu per hour. The facility is located at 10500 Buckingham Road, Fort Myers, Lee County.

The permittee has encountered delays related to construction and the procurement of equipment. The facility has provided details on the progression of construction of Unit 3 and expects the project to be completed no later than December 31, 2007.

The Department has reasonable assurance that the project will not result in significant net emission increases from the unit that would otherwise require a review under the Rules for the Prevention of Significant Deterioration at Paragraph 62-212.400, F.A.C. or 40 CFR 52.21.

The Department will issue the Final Permit, in accordance with the conditions of the Draft Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made availa-

ble for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000.

Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 14 days of publication of the public notice of intent, whichever occurs first.

Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it.

Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b)

The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the relief sought, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file 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
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/921-9533

Department of Environmental Protection
South District Office
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-3881
Telephone: 239/332-6975
Fax: 239/332-6969

The complete project file includes the Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Program Administrator, South Permitting Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida

32301, Tallahassee, Florida 32301. Telephone: 850/488-0114. Fax: 850/921-9533. Department of Environmental Protection South District Office 2295 Victoria Avenue, Suite 364 Fort Myers, Florida 33901-3881. Telephone: 239/332-6975. Fax: 239/332-6969.

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32301, Tallahassee, Florida 32301. Telephone: 850/488-0114. Fax: 850/921-9533. Department of Environmental Protection South District Office 2295 Victoria Avenue, Suite 364 Fort Myers, Florida 33901-3881. Telephone: 239/332-6975. Fax: 239/332-6969.

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Order Confirmation

<u>Ad Order</u> 0001149732	<u>Customer</u> LCBC-SOLID WASTE-J	<u>Payor Customer</u> LCBC-SOLID WASTE-J	<u>PO Number</u> Public Notice of Intent
<u>Sales</u> gvanderb	<u>Customer Account</u> A586659	<u>Payor Account</u> A586659	<u>Ordered By</u> Brigitte Kantor
<u>Order Taker</u> gvanderb	<u>Customer Address</u> PO BOX 2238 FORT MYERS FL 33902-2238 USA	<u>Payor Address</u> PO BOX 2238 FORT MYERS FL 33902-2238 USA	<u>Customer Fax</u>
<u>Order Source</u> Fax	<u>Customer Phone</u> (239)335-2463	<u>Payor Phone</u> (239)335-2463	<u>Customer EMail</u> Ltong@leegov.com
			<u>Special Pricing</u> None

<u>Tear Sheets</u> 1	<u>Proofs</u> 0	<u>Affidavits</u> 0	<u>Blind Box</u>	<u>Promo Type</u>	<u>Materials</u>
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<u>Invoice Text</u> Public Notice of Intent	<u>Ad Order Notes</u>
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<u>Net Amount</u>	<u>Tax Amount</u>	<u>Total Amount</u>	<u>Payment Method</u>	<u>Payment Amount</u>	<u>Amount Due</u>
\$295.20	\$0.00	\$295.20		\$0.00	\$295.20

<u>Ad Number</u> 0001149732-0	<u>Ad Type</u> Legal Liner	<u>Ad Size</u> : 1.0 X 369 Li	<u>Color</u> <NONE>	<u>Production Method</u> AdBooker	<u>Production Notes</u>
<u>External Ad Number</u>	<u>Ad Attributes</u>	<u>Ad Released</u> No	<u>Pick Up</u>		

<u>Product Information</u>	<u>Placement/Classification</u>	<u>Run Dates</u>	<u># Inserts</u>	<u>Cost</u>
<u>Run Schedule Invoice Text</u>	<u>Sort Text</u>			
The News-Press: :Classified	1001-1099 Legals	1/25/2007	1	\$295.20
PUBLIC NOTICE OF INTENT TO ISSUE / PUBLICNOTICEOFINTENTTOISSUEAIR				



LEE COUNTY
SOUTHWEST FLORIDA

BOARD OF COUNTY COMMISSIONERS

RECEIVED

FEB 06 2007

(239) 338-3302

BUREAU OF AIR REGULATION

Bob Janes
District One

A. Brian Bigelow
District Two

Ray Judah
District Three

Tammy Hall
District Four

Frank Mann
District Five

Donald D. Stilwell
County Manager

David M. Owen
County Attorney

Diana M. Parker
County Hearing
Examiner

February 2, 2007

Mr. Al Linero, Program Administrator
Fl. Dep't. of Environmental Protection
111 S. Magnolia, Suite 23
Tallahassee, FL 32301

**Subject: PSD-FI-151D (0710119-005-AC
Lee County Waste to Energy Facility
Unit 3 Construction Permit Extension**

Dear Mr. Linero:

Upon review of the subject materials and the 'Intent to Issue Air Construction Permit', we would like to point out some minor inconsistencies between the requirements of the PSD permit and the 'Summary of Best Available Control Technology Determination' that is attached to the Permit as Appendix BD. We have attached a copy of the letter from Mr. David Dee to Ms. Trina Vielhauer, dated October 22, 2003, that previously detailed these inconsistencies and are again providing these same comments as follows:

1. In Appendix BD, on page BD-2, third full paragraph, the first sentence states that "a BACT emission limit of 110 ppmvd @ 7% O₂ shall be established on a 30-day rolling average". This sentence should refer to a 12-month rolling average, consistent with the provisions of Sections III.B.4 and III.B.8 in the permit.
2. Similarly, on page BD-3, in the initial paragraph, the last sentence states that the "Department will establish two CO limits as BACT, the NSPS as well as a 30-day rolling average of 80 ppmvd @ 7% O₂". This sentence also should refer to a 12-month rolling average.
3. On page BD-4, the table indicates that the emission limit for carbon monoxide is "80 ppm @ 7%O₂ - 30-day rolling average". Here, too, a 12-month average should be used.

As mentioned before, these comments warrant no further action by the Department. The County simply wishes to identify the inconsistencies for the record and avoid any potential confusion in the future regarding the applicable emission limits.

Mr. Al Linero
February 2, 2007
Page 2 of 2

If you have any questions, please call me at 338-3302.

Sincerely,



Lindsey J. Sampson, Director
Solid Waste Division

w/ Attachment

Cc: D. Castro, HDR
R. Blackburn, DEP South District
File, PSD

LANDERS & PARSONS, P.A.

ATTORNEYS AT LAW

310 WEST COLLEGE AVENUE
TALLAHASSEE, FL 32301

DAVID S. DEE
RONALD A. LABASKY
JOSEPH W. LANDERS, JR.
JOHN T. LAVIA, III
FRED A. McCORMACK
PHILIP S. PARSONS
ROBERT SCHEFFEL WRIGHT

II A507

MAILING ADDRESS:
POST OFFICE BOX 271
TALLAHASSEE, FL 32302-0271

REC'D MAR 24 2004

October 22, 2003

TELEPHONE (850) 681-0311
TELECOPY (850) 224-5595
www.landersondparsons.com

Ms. Trina Vielhauer
Bureau Chief
Division of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
MS 5505
Tallahassee, Florida 32399-2400

Re: Lee County Solid Waste Energy Recovery Facility;
Permit No. PSD-FL-151C

Dear Trina:

On October 13, 2003, the Florida Department of Environmental Protection issued a PSD permit (No. PSD-FL-151C) for the construction of the third municipal waste combustor at the existing Lee County Solid Waste Energy Recovery Facility. After reviewing the Department's permit, the County noted a few inconsistencies between the requirements of the PSD permit and the "Summary of Best Available Control Technology Determination (BACT)" that is attached to the permit as Appendix BD. On behalf of Lee County, I am sending you this letter to identify the inconsistencies for your records.

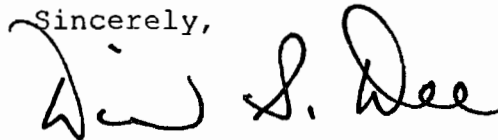
1. In Appendix BD, on page BD-2, third full paragraph, the first sentence states that "a BACT emission limit of 110 ppmvd @ 7% O₂ shall be established on a 30-day rolling average." This sentence should refer to a 12-month rolling average, consistent with the provisions of Sections III.B.4 and III.B.8 in the permit.

2. Similarly, on page BD-3, in the initial paragraph, the last sentence states that the "Department will establish two CO limits as BACT, the NSPS as well as a 30-day rolling average of 80 ppmvd @ 7% O₂." This sentence also should refer to a 12-month rolling average.

Ms. Trina Vielhauer
October 22, 2003
Page 2

3. On page BD-4, the table indicates that the emission limit for carbon monoxide is "80 ppm @ 7% O₂ -- 30-day rolling average." Here, too, a 12-month average should be utilized.

None of these comments warrant any further action by the Department. The County simply wishes to identify the inconsistencies for the record and thus help avoid potential confusion in the future concerning the emission limits that are applicable to the County's Facility.

Sincerely,


David S. Dee

cc: Lindsey Sampson
✓ David Owen
Don Elias
Sam Rosania
Hamilton Oven

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer
THROUGH: Al Linero *aal*
FROM: Cindy Mulkey *cm*
DATE: January 19, 2007
SUBJECT: Lee County Resource Recovery Facility
Unit 3 MWC Construction Extension
DEP File No. 0710119-005-AC, PSD-FL-151D

Attached is the Intent to Issue package for extension of the Lee County Resource Recovery Facility Unit 3 construction permit expiration date. The current construction permit (PSD-FL-151C) expired on December 31, 2006. The applicant has incurred unforeseen problems related to procurement of construction contracts and equipment. Lee County has requested, by letter, an extension to December 31, 2007. The facility has provided recent construction details and has assured us that construction and testing will be completed by this time.

We recommend your approval of the attached Intent to Issue.

AAL/cm

Attachments



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor
Jeff Kottkamp
Lt. Governor
Michael W. Sole
Secretary

January 19, 2007

Electronically sent – Received Receipt requested.

Mr. Lindsey J. Sampson
Director, Solid Waste Division
Lee County Southwest Florida
Post Office Box 398
Fort Myers, Florida 33902-0398

Re: PSD-FL-151D (0710119-005-AC)
Lee County Resource Recovery Facility
Unit 3 Construction Permit Extension

Dear Mr. Sampson:

Enclosed is one copy of the Draft Air Construction Permit which incorporates the conditions of the latest air construction permit (PSD-FL-151C, 0710119-002-AC) and extends the permit expiration date by one year for the construction of the Unit 3 municipal waste combustor and lime storage silo at the existing Lee County Resource Recovery Facility. The Department's Intent to Issue Air Construction Permit, and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, such as a newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A.A. Linero, Program Administrator, at the letterhead address. If you have any questions regarding this matter, please contact Cindy Mulkey at (850)921-8968 or Mr. Linero at (850)921-9523.

Sincerely,


Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/aal/cm

Enclosures

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice, Technical Evaluation, and the Draft permit) and all copies were sent electronically (with Received Receipt) before the close of business on

11/22/07 to the persons listed:

D. Castro, HDR Engineering, Inc.: dcastro@hdrinc.com

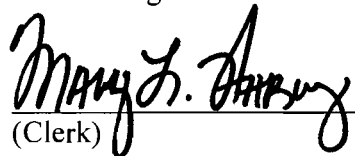
K. Dunbar, HDR Engineering, Inc.: kirk.dunbar@hdrinc.com

Jon Iglehart, DEP South District: jon.iglehart@dep.state.fl.us

Mike Halpin, Siting: mike.halpin@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52,
Florida Statutes, with the designated
Department Clerk, receipt of which is hereby
acknowledged.


(Clerk)

11/22/07
(Date)

In the Matter of an
Application for Permit by:

Lee County
Post Office Box 3193
Orlando, Florida 32802

Lee County Resource Recovery Facility
Unit 3 Municipal Waste Combustor
DEP File No. 0710119-005-AC
PSD-FL-151D

Authorized Representative:
Mr. Lindsey J. Sampson
Director, Solid Waste Division

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit, copy of Draft Permit attached, for the proposed project as detailed in the original application for the reasons stated below.

The Unit 3 municipal waste combustor is currently under construction at the Lee County Resource Recovery Facility (PSD-FL-151C, 0710119-002-AC). On January 16, 2007, the applicant requested an extension of the construction permit expiration date.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an Air Construction Permit is required.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emissions units will not adversely impact air quality, and the emissions units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 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 Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 921-9533). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of the enclosed Public Notice of Intent to Issue Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Permit No. PSD-FL-151D

DEP File No. 0710119-005-AC

Lee County Resource Recovery Facility
Municipal Waste Combustor Unit 3

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to Lee County. A third municipal waste combustor and a lime storage silo and associated equipment are currently under construction at the existing Lee County Resource Recovery Facility. The purpose of this construction permit is to extend the construction period one calendar year. This permit incorporates all conditions from the latest air construction permit (PSD-FL-151C, 0710119-002-AC) which authorizes construction of Unit 3. The municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 tons per day and maximum heat input of 291.5 million Btu per hour. The facility is located at 10500 Buckingham Road, Fort Myers, Lee County.

The permittee has encountered delays related to construction and the procurement of equipment. The facility has provided details on the progression of construction of Unit 3 and expects the project to be completed no later than December 31, 2007.

The Department has reasonable assurance that the project will not result in significant net emission increases from the unit that would otherwise require a review under the Rules for the Prevention of Significant Deterioration at Paragraph 62-212.400, F.A.C. or 40 CFR 52.21.

The Department will issue the Final Permit, in accordance with the conditions of the Draft Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any

persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 14 days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file 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
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/921-9533

Department of Environmental Protection
South District Office
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-3881
Telephone: 239/332-6975
Fax: 239/332-6969

The complete project file includes the Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Program Administrator, South Permitting Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

PERMITTEE:

Lee County
Post Office Box 398
Fort Myers, Florida 33902-0398

Authorized Representative:
Lindsey J. Sampson
Director, Solid Waste Division

Lee County Resource Recovery Facility
Unit 3 MWC and Lime Silo
DEP File No. 0710119-005-AC
PSD-FL-151D
Expires: December 31, 2007

PROJECT AND LOCATION

This permit incorporates all conditions from the latest air construction permit (PSD-FL-151C, 0710119-002-AC) and extends the expiration date by one calendar year. The permit authorizes construction of a third municipal waste combustor, and a lime storage silo and associated equipment at the existing resource recovery facility. The municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 tons per day and maximum heat input of 291.5 million Btu per hour. The facility is located at 10500 Buckingham Rd., Fort Myers, Lee County.

STATEMENT OF BASIS

This permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.): The permittee is authorized to perform the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department). This permit supplements all other air construction and operation permits for the affected emissions units and does not alter any requirements from such previously issued air permits.

The following Appendices are attached as part of this permit.

- Final Permit PSD-FL-151C
- Appendix BD BACT Determination Summary
- Appendix GC General Conditions

Draft
Joseph Kahn, Director
Division of Air Resource Management

SECTION I. GENERAL INFORMATION

FACILITY DESCRIPTION

The existing facility consists of a municipal waste combustion plant with two mass burn municipal waste combustion units. The facility currently has a capacity of 660 tons/day per unit for a total of 1,320 tons per day of solid waste fuel with a nominal higher heating value of 5,000 Btu per pound. This is equal to a maximum heat input of 275 million Btu per hour per unit, for a total heat input not to exceed 550 million Btu per hour. The facility converts solid waste into saleable energy. It produces up to 40 megawatts of electricity. The facility is self-sufficient and operates on a small portion of the power it generates. The remaining electricity is sold to an electric utility market. The facility is owned by Lee County, and was designed, built and is currently operated by Ogden-Martin Systems of Lee, Inc. (although the corporate name changed to Covanta Energy Corporation, effective March 14, 2001). The Lee County Resource Recovery Facility began operation in August 1994.

The facility's existing mass burn combustion system incorporates the technology of German-based Martin GmbH. The waterwall furnaces are equipped with Martin® reverse-reciprocating grates and ash handling systems. Waste is combusted and reduced to an inert ash residue. Each existing unit is equipped with a slaked lime scrubber followed by a baghouse, a selective non-catalytic reduction system for reduction of nitrogen oxide emissions, and a carbon injection system for control of mercury emissions.

PROJECT DESCRIPTION

This permit extends the expiration date of the previously issued permit (No. PSD-FL-151C, 0710119-002-AC) which allowed the applicant to construct a third municipal waste combustion unit (Unit 3), which is substantially similar to the existing two units. Unit 3 will have additional controls in order to comply with the more stringent New Source Performance Standards and Best Available Control Technology limits. The new municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 tons per day and maximum heat input of 291.5 million Btu per hour. Accordingly, as a large municipal waste combustor, this unit is subject to the requirements of 40 CFR 60, Subpart Eb. Dry flue gas scrubbers, baghouse, selective non-catalytic reduction, and carbon injection will be utilized to control emissions from the combustor. Flue gas recirculation is authorized but not required. The existing facility also contains existing lime silo and ash handling systems, which will be impacted via increased throughput of the new unit. An additional lime silo will be constructed, which stores pebble lime, used to make lime slurry.

EMISSIONS UNITS

This permit addresses the following emissions units:

EU ID	Emissions Unit Description
006	Unit 3 660 Tons per day nominal MSW Incinerator
007	Lime Silo

REGULATORY CLASSIFICATION

Title I, Part C, Clean Air Act: The facility is a PSD-major facility pursuant to Rule 62-212, F.A.C.

Title I, Section 111, CAA: Unit 3 is subject to the New Source Performance Standards of 40 CFR 60, Subpart Eb-Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994.

Title I, Section 112, CAA: The facility is a "Major Source" of hazardous air pollutants.

Title IV, CAA: The facility does not operate units subject to the Acid Rain provisions of the Clean Air Act.

Title V, CAA: The facility is a Title V or "Major Source of air pollution" in accordance with Chapter 62-213, F.A.C.

SECTION I. GENERAL INFORMATION

PERMITTING AUTHORITY

All documents related to applications for permits to construct, operate or modify an emissions unit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall also be submitted to the Compliance Authority.

COMPLIANCE AUTHORITY

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department of Environmental Protection South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33901-3881.

RELEVANT DOCUMENTS

The documents listed below are not a part of this permit; however, this information is specifically related to the permitting action and is on file with the Department.

- Lee County Letter dated January 16, 2007.
- Department's Final Determination issued concurrently with this Final Permit.

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SECTION II. ADMINISTRATIVE REQUIREMENTS

1. General Conditions: The permittee shall operate under the attached General Conditions listed in Appendix GC of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
2. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and the Title 40, Parts 51, 52, 60, and 63 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
3. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
4. Permit Expiration: For good cause, the permittee may request that this PSD air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.080(3), F.A.C.]
5. PSD Source Obligation:
 - a. Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - c. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
6. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Chapters 62-210 and 62-212, F.A.C.]
7. Title V Permit: This permit authorizes construction or modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V operation permit at least 90

SECTION II. ADMINISTRATIVE REQUIREMENTS

days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

8. Annual Operating Report: The Annual Operating Report shall be completed each year and submitted to the appropriate DEP division, district or DEP-approved local air pollution control program office by March 1st of each year. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370, F.A.C.]

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SECTION III - EMISSIONS UNITS SPECIFIC CONDITIONS

EU 006 and 007 MSW Incinerator and Lime Silo

This section of the permit addresses the following existing emissions units.

EU ID	Emissions Unit Description
006	Unit 3 660 Tons per day nominal MSW Incinerator
007	Lime Silo

ADMINISTRATIVE REQUIREMENTS

1. Relation to Other Permits: This permit supersedes permit, PSD-FL-151C (0171119-002-AC), dated October 13, 2003. The provisions of the air construction permit PSD-FL-151C, attached, are incorporated into this air construction permit with no changes except the expiration date is extended to December 31, 2007. [Rule 62-212.300, F.A.C.]

DRAFT



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

PERMITTEE:

Lee County
Lee County Resource Recovery Facility
P.O. Box 398
Fort Myers, Florida 33902

ID No.	0710119
Permit No.	0710119-002-AC
PSD No.	PSD-FL-151C
SIC No.	4953
Expires:	December 31, 2006

Authorized Representative:

Mr. Lindsey Sampson
Director, Solid Waste Division

PROJECT AND LOCATION:

This permit allows the applicant to construct a third municipal waste combustor (MWC), along with a lime storage silo and associated appurtenances. The new MWC will be constructed at the existing municipal waste combustion facility. The municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 TPD and maximum heat input of 291.5 million Btu per hour (MMBtu/hr).

The facility is located at 10500 Buckingham Rd., Fort Myers, Lee County. The UTM coordinates of this facility are Zone 17; 424.21 km E; 2945.7 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 and Subpart Eb of the NSPS of 40CFR60. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendix is part of this permit:

Appendix GC Construction Permit General Conditions
Appendix BD BACT Determination

Michael G. Cooke, Director
Division of Air Resources
Management

"More Protection, Less Process"

Printed on recycled paper.

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION I. FACILITY INFORMATION

SUBSECTION A. FACILITY DESCRIPTION

The existing facility consists of a municipal waste combustion facility with two mass burn municipal waste combustion (MWC) units. The facility currently has a capacity of 660 tons/day per unit for a total of 1,320 tons per day of solid waste fuel with a nominal HHV of 5,000 Btu/lb. This is equal to a maximum heat input of 275 MMBtu/hour per unit, for a total heat input not to exceed 550 MMBtu/hr. The facility converts solid waste into saleable energy. It produces up to 40 MW of electricity. The facility is self-sufficient and operates on a small portion of the power it generates. The remaining electricity is sold to an electric utility market. The facility is owned by Lee County, and was designed, built and is currently operated by Ogden-Martin Systems of Lee, Inc. (although the corporate name changed to Covanta Energy Corporation, effective March 14, 2001). The Lee County Resource Recovery Facility began operation in August 1994.

The facility's existing mass burn combustion system incorporates the technology of German-based Martin GmbH. The waterwall furnaces are equipped with Martin® reverse-reciprocating grates and ash handling systems. Waste is combusted and reduced to an inert ash residue. Each existing unit is equipped with a slaked lime scrubber followed by a baghouse, an SNCR system for reduction of NO_x emissions, and a carbon injection system for control of mercury emissions.

This permit allows the applicant to construct a third MWC unit, which is substantially similar to the existing two units, albeit with additional controls as required in order to comply with the more stringent NSPS and BACT limits. The new municipal waste combustion unit will not exceed a nominal tonnage capacity of 660 TPD and maximum heat input of 291.5 MMBtu/hr. Accordingly, as a large MWC, this unit is subject to the requirements of 40 CFR 60, Subpart Eb. Dry flue gas scrubbers, baghouse, SNCR, and carbon injection will be utilized to control emissions from the combustor. Flue Gas Recirculation (FGR) is authorized but not required. The existing facility also contains existing lime silo and ash handling systems, which will be impacted via increased throughput of the new unit. An additional lime silo will be constructed, which stores pebble lime, used to make lime slurry.

SUBSECTION B. REGULATORY CLASSIFICATION

This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

Project: Lee County Resource Recovery Facility
Facility ID No. 0710119
SIC: 4953

Lee County
Fort Myers, Florida

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION I. FACILITY INFORMATION

Based on the initial Title V permit application received June 17, 1996, this facility is a major source of hazardous air pollutants (HAPs).

SUBSECTION C. PERMIT SCHEDULE:

- June 13, 2003 notice of intent published in Ft. Myers News-Press
- June 12, 2003 issued revised notice of intent to issue permit
- April 14, 2003 notice of intent published in Ft. Myers News-Press
- April 4, 2003 issued notice of intent to issue permit
- February 28, 2003 application deemed complete

SUBSECTION D. RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received (Bureau of Air Regulation) on November 12, 2002
- Department's Request For Additional Information dated December 11, 2002
- Applicant's response to Department's Request and related information submitted by Lee County and its consultants (various dates)

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION A. ADMINISTRATIVE

- A.1 Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-0114. All documents related to reports, tests, and notifications should be submitted to the Department's South District Office (DEPSD), 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902 and phone number 239/332-6975.
- A.2 General Conditions: The owner and operator are subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- A.3 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- A.4 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
- A.5 Application for Title V Permit: An application for a modification of the Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation and a copy to DEPSD. [Chapter 62-213, F.A.C.]
- A.6 New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION B. CONSTRUCTION REQUIREMENTS

B.1 Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit (s) shall be in accordance with the capacities and specifications stated in the application. The unit is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Section 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations [Rule 62-204.800, F.A.C.]. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations [Rule 62-210.300, F.A.C.]

SUBSECTION C. OPERATIONAL REQUIREMENTS

C.1 Changes/Modifications: The owner or operator shall submit to the Department's Bureau of Air Regulation, for review any changes in, or modifications to: the method of operation; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual short term or long term emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain, an air construction permit prior to making the desired change. [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]

C.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the DEPSD as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]

C.3 Operating Procedures shall include good combustion practices and proper training and certification of all operators. The good combustion practices shall meet the guidelines established in 40 CFR 60, Subpart Eb and procedures as established by recognized industry standards. All operators (including supervisors) of air pollution control device shall be properly trained and certified in plant specific equipment. A list of all such certified personnel shall be submitted to the DEPSD. Department's staff shall be given notice of any formal training sessions related to operation and maintenance of air pollution control devices. [Rule 62-204.800(8), F.A.C. and 62-4.070 (3), F.A.C.]

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

- C.4 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Air Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in **Rule 62-297.620, F.A.C.**

SUBSECTION D. MONITORING OF OPERATIONS

Determination of Process Variables

- D.1 The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- D.2 Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

SUBSECTION E. OTHER REQUIREMENTS

- E.1 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not relieve the permittee from securing any other types of required permits, licenses, or certifications.

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. 40 CFR 60, NSPS, GENERAL PROVISIONS

The following emission limitations shall apply to the affected emissions unit after compliance testing is completed. As used in this permit, initial operations shall mean after the initial compliance testing is complete. This section addresses the following emissions unit:

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION	SYSTEM
-006	660 Tons per day nominal MSW Incinerator	MSW Unit 3

The affected emissions units shall comply with all applicable requirements of 40 CFR 60, General Provisions, Subpart A.

- A.1 [40 CFR 60.7, Notification and record keeping]
- A.2 [40 CFR 60.8, Performance tests]
- A.3 [40 CFR 60.11, Compliance with standards and maintenance requirements]
- A.4 [40 CFR 60.12, Circumvention]
- A.5 [40 CFR 60.13, Monitoring requirements]
- A.6 [40 CFR 60.19, General notification and reporting requirements]

The affected emissions units shall comply with all applicable provisions of the 40 CFR 60, Subpart Eb-Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996. In addition the emissions unit shall also comply with all the conditions listed in Section II (Emissions Unit General Requirements) of this permit.

[Rule 62-4.070(3), 62-204.800(8) and 62-296.416, F.A.C.]

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION B. SPECIFIC CONDITIONS:

The following specific conditions apply to the following emissions unit.

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
-006	660 Tons per day nominal MSW Incinerator

OPERATIONAL REQUIREMENTS

- B.1 The combustor (boiler) shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, and rated capacity.
[Rule 62-4.070(3), F.A.C.]
- B.2 Process Operating Rates: The municipal waste combustor unit (MWC) shall have a nominal rated capacity of 660 tons of waste per day. Maximum heat input shall be 291.5 MMBtu/hr.
[Rules 62-4.070(3) and 62-204.800(8), F.A.C., 40 CFR 60.51b and 60.58b(j)]
- B.3 Load Level : *Unit load* means the steam load of the municipal waste combustor (MWC) measured as specified in 40 CFR 60.58b(i)(6). Compliance with load level requirements shall be determined by a steam meter using ASME Power Test Code for Steam Generating Units, Power Test Code 4.1, section 4 (see 40 CFR 60.58b(i)(6)(ii) & (iii)). The MWC unit shall not operate at a load level greater than 110 percent of the unit's *maximum demonstrated unit load* based on 4-hour block averaged measurements of steam flow. The maximum demonstrated unit load is the highest arithmetic averaged measurement of steam flow recorded for four consecutive hours during the most recent dioxin/furan performance stack test in which compliance with the dioxin/furan emission limit was achieved. Higher loads are allowed for testing purposes as specified at 40 CFR 60.53b(b) and condition D.7 of this permit. [Rule 62-204.800(8), F.A.C., 40 CFR 60.51b; 60.53b(b); and 60.58b(i) (6)&(8)]
- B.4 Emission Control Equipment

Particulate Matter

The unit shall be equipped with a particulate control baghouse designed, constructed and operated so as not to exceed a maximum emission rate of 20.6 mg/dscm corrected to 7 percent O₂. The baghouse shall be equipped with pressure drop monitoring equipment.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

Spray Dryer Scrubber

The unit shall be equipped with a spray dryer scrubber designed, constructed and operated so as to remove SO₂ at an efficiency of 80 percent, or not to exceed a maximum emission rate of 26 ppmvd corrected to 7 percent O₂ based upon a 24-hour block geometric mean, whichever is less stringent.

Carbon Injection

The unit shall be equipped with a carbon injection system. The carbon injection rate must be measured continuously and maintained in compliance with the requirements set forth in this permit as well as 40 CFR 60.58b(m).

Selective Non-Catalytic Reduction System

The unit shall be equipped with a selective non-catalytic reduction system designed, constructed and operated so as not to exceed a maximum NO_x emission rate of 150 ppmvd corrected to 7 percent O₂ on a 24-hour block arithmetic mean (midnight to midnight) as well as 110 ppmvd corrected to 7 percent O₂ on a 12-month rolling average and designed to meet 15 ppmvd @ 7% O₂ ammonia slip on a 24 hour average. Notwithstanding these requirements, the unit shall be granted a period of 12 calendar months from the initial compliance test of the MWC, in order to meet the 110 ppmvd NO_x and the 30 ppm ammonia slip limits identified within this permit. During this initial calendar year of operation, the 12-month rolling average limit for NO_x shall be 140 ppmvd @ 7% O₂ based upon the actual number of calendar months since initial operation. For each month after the initial calendar year of operation, the 12-month rolling average limitation shall be reduced by 2.5 ppmvd @ 7% O₂ until reaching the BACT limit of 110 ppmvd @ 7% O₂ on a 12-month rolling average. The ammonia slip limit shall be 50 ppmvd @ 7% O₂ for the first 12 calendar months from initial operation and shall be adjusted as set forth in paragraph B.10 (5), below. Note: Nothing in this permit shall be construed as an authorization to exceed the opacity standard specified herein.

Within 30 days after it becomes available, but before commencement of construction of the air pollution control equipment, the Permittee shall submit to the DEPSD copies of technical data pertaining to the selected emission control systems. This data should include, but not be limited to the manufacturer's guarantees, design inlet and outlet emission rates, and major design parameters. [Rule 62-4.070(3), F.A.C.]

- B.5 Stack Height: The height of the boiler exhaust stack shall not be less than 276 feet above grade (271 feet for structural stack plus 5 feet for flue).
- B.6 Fuels: The primary fuel for the unit is municipal solid waste (MSW), including the items and materials that fit within the definition of MSW contained in either 40 CFR 60.51b or

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

Section 403.706(5), Florida Statutes (1995). [Rule 62-4.070(3), F.A.C., and request of applicant]

B.6.1 Subject to the limitations contained in this permit, the authorized fuels for the unit also include the other solid wastes that are not MSW which are described below. However, the unit shall not burn:

- (a) those materials that are prohibited by state or federal law;
- (b) those materials that are prohibited by this permit;
- (c) lead acid batteries;
- (d) hazardous waste;
- (e) nuclear waste;
- (f) radioactive waste;
- (g) sewage sludge;
- (h) explosives;
- (i) beryllium-containing waste, as defined in 40 CFR 61, Subpart C.

Further, the facility shall not knowingly burn:

- (j) nickel-cadmium batteries pursuant to Section 403.7192 (3);
- (k) mercury containing devices and lamps pursuant to Sections 403.7186(2) & (3);
- (l) untreated biomedical waste from biomedical waste generators regulated pursuant to Chapter 64E-16, F.A.C., and from similar generators (or sources); and
- (m) segregated loads of biological waste.

B.6.2 The fuel may be received either as a mixture or as a single-item stream (segregated load) of discarded materials. If the unit intends to use an authorized fuel that is segregated non-MSW material, the fuel shall be either:

- (a) well mixed with MSW in the refuse pit; or
- (b) alternately charged with MSW in the hopper.

B.6.3 The unit operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received and used as fuel at the unit, and subject to a percentage weight limitation, below (B.6.6. and B.6.7). For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of waste material, as determined by visual observation.

B.6.4 To ensure that the unit's fuel does not adversely affect the unit's combustion process or emissions, the unit operator shall:

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- (a) comply with good combustion operating practices in accordance with 40 CFR 60.53b;
- (b) install, operate and maintain continuous emissions monitors (CEMS) for oxygen, carbon monoxide, sulfur dioxide, oxides of nitrogen and temperature in accordance with 40 CFR 60.58b; and
- (c) record and maintain the CEMS data in accordance with 40 CFR 60.59b.

These steps shall be used to ensure and verify continuous compliance with the emissions limitations in this permit.

Natural gas or propane may be used as fuel during warm-up, startup, shutdown, and malfunction periods, and at other times when necessary and consistent with good combustion practices.

B.6.5 Subject to the conditions and limitations contained in this permit, the following other solid waste may be used as fuel at the unit:

- (a) Confidential, proprietary or special documents (including but not limited to business records, lottery tickets, event tickets, coupons and microfilm);
- (b) Contraband which is being destroyed at the request of appropriately authorized local, state or federal governmental agencies, provided that such material is not an explosive, a propellant, a hazardous waste, or otherwise prohibited at the unit. For the purposes of this section, contraband includes but is not limited to drugs, narcotics, fruits, vegetables, plants, counterfeit money, and counterfeit consumer goods;
- (c) Wood pallets, clean wood, and land clearing debris;
- (d) Packaging materials and containers;
- (e) Clothing, natural and synthetic fibers, fabric remnants, and similar debris, including but not limited to aprons and gloves;
- (f) Rugs, carpets, and floor coverings, but not asbestos-containing materials or polyethylene or polyurethane vinyl floor coverings; and
- (g) The predominantly combustible fraction of sorted construction and demolition debris. Sorting of mixed construction and demolition debris at the unit shall occur on the tipping floor or at another location approved by the Department.

B.6.6 Subject to the conditions and limitations contained in this permit, waste tires may be used as fuel at the unit. The total quantity of waste tires received as segregated loads and burned at the unit shall not exceed 3%, by weight, of the unit's total fuel. Compliance with this limitation shall be determined by using a calendar monthly average in accordance with specific condition B.24 below.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

B.6.7 Subject to the conditions and limitations contained in this permit, the following other solid waste materials may be used as fuel at the unit (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 unit shall not exceed 5% by weight of the unit's total fuel. Compliance with this limitation shall be determined by using a calendar monthly average in accordance with specific condition B.24 below.

- (a) 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.
- (b) Oil spill debris from aquatic, coastal, estuarine or river environments. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (c) 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.
- (d) 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.
- (e) Waste materials that:
 - (i) are generated in the manufacture of items in categories (c) or (d), above and are functionally or commercially useless (expired, rejected or spent); or
 - (ii) 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.
- (f) Waste materials that contain oil from:
 - (i) the routine cleanup of industrial or commercial establishments and machinery; or
 - (ii) spills of virgin or used petroleum products. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (g) Used oil and used oil filters. Used oil containing a PCB concentration equal or greater than 50 ppm shall not be burned, pursuant to the limitations of 40 CFR 761.20(e).
- (h) 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 prior approval of the Department.

B.7 Startup/Shutdown/Malfunctions

- (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

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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. See also NSPS requirements set forth in paragraphs b, c and d below. [Rule 62-210.700, F.A.C.]

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

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EMISSION LIMITATIONS & STANDARDS

B.8 Emissions from the MWC unit shall not exceed the limits listed in the following table.
[BACT]

Pollutant Name	Standard(s)	Lbs/hour	TPY
Particulate Matter (PM ₁₀)	20.6 mg/dscm, corrected to 7% O ₂	5.12	22.3
MWC Metals (PM)	20.6 mg/dscm, corrected to 7% O ₂	5.12	22.3
Sulfur Dioxide (SO ₂)	26 ppm, or 80% reduction, at 7% O ₂ ⁽¹⁾	56.9	249.4
Sulfuric Acid Mist (SAM)	15 ppmvd @ 7% O ₂	15.1	66.1
Nitrogen Oxides (NO _x)	110 ppm@ 7% O ₂ - 12-month rolling avg. 140 ppm @ 7% O ₂ - 12-month rolling avg. * 150 ppm @ 7% O ₂ - 24 hour average	70.8	289.4
Carbon Monoxide (CO)	80 ppm @ 7% O ₂ - 12-mo rolling avg. 100 ppm @ 7% O ₂ - 4 hr average	23.0 28.73	100.6
Mercury (Hg)	0.028 mg/dscm @ 7% O ₂ or 85% reduction ⁽¹⁾	0.0168	0.0736
Visible Emissions (VE)	10 %, 6 minute average		
Lead (Pb)	0.2 mg/dscm, corrected to 7% O ₂	0.05	0.22
MWC Acid Gas (HCl)	25 ppm or 95% reduction @ 7% O ₂ ⁽¹⁾	46.76	204.8
Hydrogen Fluoride (HF)	3.5 ppmvd @ 7% O ₂	0.718	3.145
Cadmium (Cd)	0.02 mg/dscm @ 7% O ₂	.005	0.022
Dioxin/Furan (PCDD/F)	13 ng/dscm, corrected to 7% O ₂	3.2 x 10 ⁻⁶	1.4 x 10 ⁻⁵
Ammonia	15 ⁽²⁾ / 30 ppmvd @ 7% O ₂ 50 ppmvd @ 7% O ₂ *		

Notes to table:

* - For the 12-month calendar period following initial operation only.

Abbreviations

ug/dscm: Micrograms per dry standard cubic meter

mg/dscm: Milligrams per dry standard cubic meter

ng/dscm: Nanograms per dry standard cubic meter

ppm: Part per million dry volume

Dioxins/ furans: Total tetra through octa-chlorinated dibenzo-p-dioxins and dibenzofurans

Note (1) Whichever standard is less stringent.

Note (2) Design Standard.

[40 CFR 60.58b, Rules 62-210.200, 62-212.400 (BACT), 62-204.800(8) and 62-4.070(3), F.A.C., and request of applicant]

B.9 Auxiliary Burners: Auxiliary burners shall be fired only with natural gas or propane.
[Rule 62-4.070(3), F.A.C.]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

COMPLIANCE AND PERFORMANCE TESTING

B.10 Stack Testing

Compliance with the emission limits for visible emissions (opacity), carbon monoxide (CO), nitrogen oxides (NO_x), and sulfur dioxide (SO₂) in specific condition B.8 of this permit shall be demonstrated by continuous emission monitoring systems (CEMS) as required by specific condition B.13.

Compliance tests for the other pollutants listed in specific condition B.8 shall be performed annually (unless indicated otherwise) by using the following reference methods as described in 40 CFR 60, Appendix A and/or 40 CFR 61 Appendix B adopted by reference in Chapter 62-204, F.A.C. or any other method as approved by FDEP, in accordance with Chapter 62-297, F.A.C. Stack tests may also require Method 1, 2, 3/3A/3B and 4 tests as appropriate. Testing shall be conducted in accordance with the requirements of 40 CFR 60.58b Compliance and Performance Testing. With the exception of mercury testing, emission determinations based on stack tests shall be the average of three valid test runs pursuant to Rule 62-297.310(1), F.A.C. A test protocol shall be submitted for approval to the DEP SD at least 45 days prior to the initial testing. [Rule 62-204.800(8), F.A.C. and Chapter 62-297, F.A.C.]

Method 5 ⁽¹⁾	Determination of Particulate Matter Emissions from Stationary Sources.
Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources.
Method 13A/B ⁽⁴⁾	Determination of Total Fluoride Emission from Stationary Sources.
Method 23 ⁽²⁾	Determination of Dioxin/Furan Conc. from Stationary Sources.
Method 26 ⁽³⁾ or 26A	Determination of HCl emissions.
Method 29 ⁽³⁾ ⁽⁴⁾	Determination of Metals Emissions from Stationary Sources.
Method CTM-027 ⁽⁵⁾	Conditional Test Method for Collection and Analysis of Ammonia.

- (1) Pursuant to 40 CFR 60.58b(c)(3) EPA Reference Method 5 shall be used for determining compliance with the particulate matter emission limit. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 ± 14 °C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run. Since the limit for MWC Metals (as PM) is identical to the limit for PM₁₀, one annual test may suffice in determining compliance with both limits.

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- (2) Dioxin/Furan emission limit expressed as the total mass of tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans. The unit may perform less frequent testing for dioxin/furan emissions, as allowed by 40 CFR 60.38b(b) and 60.58b(g)(5)(iii) and (6) with prior notice to the Department, if the unit's dioxin/furan emissions do not exceed 7 ng/dscm corrected to 7% O₂ and if the existing two MWC units' dioxin/furan emissions do not exceed 15 ng/dscm each, corrected to 7% O₂.
 - (3) SO₂, Mercury and HCl stack tests upstream and downstream of the control device(s) shall be conducted to calculate percent control. Demonstration of the SO₂ emission limit shall be used as a surrogate for determining compliance with the SAM emission limit.
 - (4) The mercury emission rate shall be limited to no more than 0.028 mg/dscm at 7% O₂ or an 85% reduction (whichever is less stringent) based upon three valid test runs (annually) pursuant to Rule 62-297.310(1), F.A.C. However, the applicant may eliminate one test run per year in the event that the single run yields an inlet Hg concentration above 0.450 mg/dscm at 7% O₂, and the carbon injection system can be shown to have been operating properly. In the alternative, the applicant may retest within 30 days after receiving test results showing that the inlet Hg concentration was above 0.450 mg/dscm at 7% O₂ in two or more test runs, provided the applicant demonstrates that the carbon injection system was working properly during the test runs.
 - (5) The ammonia slip rate shall be initially established for a 12-month period at 50 ppmvd @ 7% O₂ and based upon quarterly stack test results. Thereafter, the ammonia slip rate shall be established at 30 ppmvd @ 7% O₂ based upon quarterly stack test results. However, if the ammonia CEMS demonstrates that the quarterly ammonia slip average for the calendar quarter preceding the scheduled quarterly test is 15 ppmvd @ 7% O₂ or less, then CEMS data shall substitute for the required quarterly stack test.
- B.11. Test Procedures:** Compliance tests shall meet all applicable requirements (i.e., testing frequency, minimum compliance duration, etc.) of Chapter 62-297, F.A.C. The Method 9 test shall be conducted during one run of the particulate matter test. The particulate matter test shall be conducted under conditions representative of normal operations and at least one test run shall be conducted during a normal (soot blowing) cycle. Initial performance tests for SO₂, CO and NO_x shall be conducted using CEMS in accordance with the methods and requirements of 40 CFR 60.58b(e)(4), (h)(3) and (i)(3) respectively. Simultaneous CEMS data for NO_x shall be submitted with the quarterly ammonia stack test data and results. All test reports shall include the information required by 40 CFR 60.59b(f). [Rules 62-4.070(3), 62-297.310 and 62-204.800(8), F.A.C.; 40 CFR 60.58b and 40 CFR 60.59b]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- B.12 Stack Testing Facilities: The owner or operator shall install stack testing facilities in accordance with Rule 62-297.310(6), F.A.C. The owner or operator shall provide ports in the air pollution control equipment outlet duct or stack and shall provide access to the sampling ports. [Rule 62-297.310(6)(c), F.A.C.]

MONITORING OF OPERATIONS

- B.13 Continuous Monitoring: Compliance with the emission limits for carbon monoxide (CO), nitrogen oxides (NO_x) and sulfur dioxide (SO₂) in specific condition B.8 of this permit shall be demonstrated by continuous emission monitoring systems (CEMS) operated in accordance with the requirements of 40 CFR 60.58b. Oxygen (O₂), and opacity shall be monitored by continuous monitoring systems. Monitors for sulfur dioxide and oxygen shall be located both upstream of the dry scrubber and downstream of the baghouse in order to calculate percentage removal efficiency. A CEMS shall be installed for the purpose of measuring ammonia slip from this emissions unit (with a range of 100ppm), and used for informational purposes rather than continuous compliance (other than as allowed for in specific condition B.10). For purposes of the RATA, this CEMS shall be compared to CTM-027. All continuous monitoring systems shall be installed, calibrated, maintained and operated as required by 40 CFR 60.13 and shall conform to all applicable Performance Specifications in 40 CFR 60, Appendix B. Quality assurance procedures shall conform to all applicable sections of 40 CFR 60, Appendix F. Initial performance evaluations shall be completed within 180 days after initial startup of the unit. Data on continuous monitor equipment specifications, manufacturer, type, calibration and maintenance needs, and proposed locations shall be provided to the DEPSD for review at least 90 days prior to installation. [Rules 62-4.070(3) and 62-204.800(8), F.A.C.; 40 CFR 60.58b]
- B.14 Continuous Load Monitoring: The owner or operator shall install, calibrate, maintain, and operate a steam flow meter, measure steam flow in kilograms (or pounds) per hour on a continuous basis, and record the output of the monitor (in accordance with the ASME method described in 40 CFR 60.58b(i)(6)). Steam flow shall be calculated in 4-hour block arithmetic averages. Higher loads are allowed for testing purposes pursuant to 40 CFR 60.53b(b). [Rule 62-204.800(8), F.A.C., 40 CFR 60.51b; 60.53b(b); and 60.58b(i)(6)]
- B.15 Charging Rate Monitoring: The average daily solid waste charging rate shall be determined on a monthly basis and recorded for the MWC unit. The daily charging rate shall be determined each month on an average daily basis for the MWC unit using the facility's truck scale weight data, refuse pit inventory data and MWC operating data for the preceding calendar month. Monthly truck scale weight records of the weight of solid waste received and processed at the unit, and refuse pit inventory data, shall be used to determine the amount of solid waste charged during the preceding calendar month on an average daily basis. The MWC load level measurements or other operating data shall be used to

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determine the number of operating hours for each day during the preceding calendar month. [Rules 62-204.800(8) and 62-4.070(3), F.A.C.]

- B.16 Compliance with the PM Control Device Temperature: The MWC unit is required to continuously monitor and record the flue gas temperature at the inlet to the PM control device in accordance with the requirements at 40 CFR 60.58b(i)(7). The PM control device temperature shall be calculated in 4-hour block arithmetic averages. The MWC unit shall be allowed to operate up to 17°C (30° F) above the unit's maximum demonstrated PM control device temperature. The maximum demonstrated PM control device temperature is the highest 4-hour arithmetic measurement of temperature at the inlet to the PM control device recorded for 4 consecutive hours during the most recent dioxin/furan performance test which complied with the limits given above. The PM control device inlet temperature and the steam flow for the unit during the stack test shall be continuously monitored and recorded in accordance with 40 CFR 60, Subpart Eb. Higher temperatures are allowed for testing purposes, as specified at 40 CFR 60.53b(c). [Rule 62-204.800(8), F.A.C., 40 CFR 60.53b(c) and 60.58b(i)(7) and (9)]
- B.17 Carbon Injection Rate: The optimal carbon injection rate in pounds-per hour shall be determined preceding and during the initial compliance test. Optimization should be based upon the maximum expected mercury inlet concentrations as well as necessary operating parameters such as the screw feeder speed, hopper volume, hopper refill frequency, or other parameters appropriate to the feed system being employed. During operation of the MWC unit, the carbon injection system shall be provided with a continuous indication of the injection rate and the carbon mass feed rate must equal or exceed the level which was determined as optimal. The owner or operator shall estimate the total carbon usage for the unit for each calendar quarter by utilizing the measured carbon mass feed rate (lb/hr) for each hour of operation of the MWC unit based on the continuous indicator for carbon mass feed rate, and the total number of operating hours of operation during the calendar quarter. [Rule 62-204.800(8), F.A.C. and 40 CFR 60.58b(m)]
- B.18 Continuous Monitors: Continuous monitors with recorders shall be installed, calibrated, maintained and operated for the unit subject to review by the DEPSD for the following operational parameters:
- Total steam production (mass/hr, pressure and temperature)
 - Carbon injection system feed rate (kg/hr or lb/hr)
 - Particulate matter control device inlet temperature
- [Rule 62-204.800(8), F.A.C. and 40 CFR 60.58b]

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RECORD KEEPING AND REPORTING REQUIREMENTS

B.19 Reports and Records:

All measurements, records and other data (test reports, etc.) required to be maintained by this facility shall be retained for at least five (5) years following the date on which such measurements, records and other data are recorded. Such records shall be maintained at the facility and shall include but not be limited to the items listed below. These records shall be made available upon request to the DEPSD for inspection at the facility. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., 40 CFR 60.59b]

- (a) Data collected from all monitoring instruments, including continuous monitoring systems, steam flow measurements and PM control device temperatures;
- (b) Continuous steam flow records on a 4-hour block average basis;
- (c) Records of daily solid waste charging rates and hours of operation derived from monthly truck scale data, refuse pit inventory, and operational records;
- (d) Results of all source tests or performance tests; and records of the maximum demonstrated unit load specified by condition B.3 of this permit.
- (e) Amounts of activated carbon used for emissions control;
- (f) Calibration logs for all instruments subject to this permit;
- (g) Maintenance/repair logs for any work performed which is subject to this permit;
- (h) Records showing the names of facility personnel who have been provisionally or fully certified, and who have completed the MWC operator training course, and who have completed reviews of the operating manual, including the dates and documentation of certification/review.
- (i) Records demonstrating compliance with the percentage limitations on segregated solid wastes required by specific condition B.24 of this permit.

B.20 Excess Emission Reports:

B.20.1 Quarterly Reports:

The owner or operator shall submit excess emission reports for any calendar quarter during which there are excess emissions from the unit pursuant to 40 CFR 60.7(c). If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report quarterly stating that no excess emissions occurred during the quarterly reporting period. The report shall include the following:

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- (a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each period of excess emissions. [40 CFR 60.7(c)(1)]
- (b) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measures adopted. [40 CFR 60.7(c)(2)]
- (c) The date and time identifying each period during which the continuous monitoring system (CEM/COM) was inoperative except for zero and span checks, and the nature of the system repairs or adjustments. [40 CFR 60.7(d)(2) as applicable]
- (d) When no excess emissions have occurred or the continuous monitoring system (CEM/COM) has not been inoperative, repaired, or adjusted, such information shall be stated in the report. [40 CFR 60.7(c)(4)]

B.20.2 Other Excess Emission Reports:

In case of excess emissions resulting from malfunctions*, the owner or operator shall notify the DEPSD in accordance with Section 62-4.130, F.A.C. The DEPSD shall be notified within one working day excluding weekends and holidays of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the DEPSD may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the DEPSD.

* Malfunction is defined at Rule 62-210.200, F.A.C. to mean any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.
[Rules 62-4.130 and 62-210.700(6), F.A.C.]

- B.21 **Continuous Emission Monitoring System Reports:** For CEM and other monitoring systems required by this permit, data on monitoring equipment specifications, manufacturer, type, calibration and maintenance needs, and proposed sampling location shall be provided to the DEPSD for review at least 90 days prior to installation.
[Rule 62-4.070(3), F.A.C.]

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- B.22 Operating Reports: Before March 1st of each year, the owner or operator shall submit to the DEPSD the Annual Operating Report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year.

No later than February 1st of each year, the owner or operator shall submit an annual report for the previous calendar year including the information required by 40 CFR 60.59b(g)(1) through (4), as applicable.

In addition, if applicable, the owner or operator shall submit to the DEPSD the information required in 40 CFR 60.59b(h) on a semiannual basis.

[Rule 62-210.370(3), F.A.C. and 40 CFR 60.59b(g) and, if applicable, 40 CFR 60.59b(h)]

- B.23 Sampling Reports: Drawings of testing facilities including sampling port locations as required by Section 62-297.310(8)(c) shall be submitted to the DEPSD for review at least 60 days prior to construction of the sampling ports.

- B.24 Segregated Solid Waste Record Keeping: The following records shall be made and kept to demonstrate compliance with the segregated non-MSW percentage limitations of specific condition B.6.6 and B.6.7:

Each segregated load of non-MSW materials, that is subject to the percentage weight limitations of specific condition B.6.6 and B.6.7, which is received for processing shall be documented as to waste description and weight. The weight of all waste materials received for processing shall be measured using the facility truck scale and recorded.

Each day the total weight of segregated tires received shall be computed, and the daily total shall be added to the sum of the daily totals from the current month. The resultant weight of tires at the end of each calendar month (excluding tires stored at the waste tire processing facility) shall be divided by the total weight of all waste materials received during each calendar month, and the resultant number shall be multiplied by 100 to express the ratio as a percent. The percentage computed shall be compared to the 3% limitation.

Each day the total weight of segregated non-MSW materials received that are subject to the 5% restriction (restricted materials) shall be computed, and the daily total shall be added to the sum of the daily totals of the current month. The resultant total weight of restricted materials at the end of each calendar month shall be divided by the total weight of all waste materials received during each calendar month, and the resultant number shall be multiplied by 100 to express the ratio as a percent. The percentage computed shall be compared to the 5% limitation.

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Subsequent to an initial test burn scheduled to allow Department representatives to observe, while firing 5% (by weight) tires at the combustion unit while operating the unit at capacity that demonstrates via the CEMS that the unit can comply with the emission limits for pollutants monitored by the CEMS while firing 5% (by weight) tires, this quantity limitation shall rise from 3% to 5%. Compliance with this limitation shall be determined on a calendar monthly basis.

- B.25 Heat Input Reporting Requirements. The owner or operator shall submit to the DEPSD notification of the date of initial startup as provided by 40 CFR 60.7. Such notification shall include the design heat input capacity of the affected unit, and the annual capacity factor at which the owner or operator anticipates operating the unit based on the fuels fired. [40 CFR 60.59b(b)]
- B.26 Report of Vendor and Equipment Selection. Within 60 days of selection of a primary vendor for this project, a report detailing the design features of the MWC equipment to be installed shall be submitted to the DEPSD. Such report shall include the nominal and maximum design capacities of the furnace, grates and boiler, and shall detail operating rates such as heat input, steam production, mass throughput and turndown capability. [Rule 62-4.070(3), F.A.C.]

OPERATOR TRAINING AND CERTIFICATION

B.27 Requirements

- (a) One of the following persons must be on duty at the facility at any time during which the MWC unit is operating: a fully certified chief facility operator or shift supervisor; or a provisionally certified chief facility operator or shift supervisor who is scheduled to take the full certification exam according to the schedule specified in Specific Condition III.B.27(b). This requirement shall take effect 6 months after the date of startup of the unit. If this person must leave the facility during his or her operating shift, a provisionally certified control room operator who is on site may fulfill this requirement. A qualified, provisionally certified control room operator may temporarily replace the fully certified shift supervisor during specific periods when the certified shift supervisor is excused from work due to vacation or illness and after notification to the Department's South District Office. [40 CFR 60.54b(c)]
- (b) No later than the date 6 months after the date of startup of the unit, each chief facility operator and shift supervisor shall obtain and maintain a current provisional operator certification and be scheduled for a full certification exam, or receive a full

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certification, from either the ASME or an equivalent State-approved certification program. [40 CFR 60.54b(a) and (b)]

- (c) Each chief facility operator, shift supervisor, and control room operator must complete the EPA or State approved MWC operator training course no later than 6 months after the date of startup of the unit. [40 CFR 60.54b(d)]

- (d) A site-specific operating manual shall be developed and updated on an annual basis which meets the requirements of 40 CFR 60.54b(e). A training program shall be established to review the operating manual with each person who has responsibilities affecting the operation of the MWC including but not limited to chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers. Each person must undergo initial training no later than the date 6 months after the date of startup of the unit or the date prior to the day that person assumes responsibilities affecting operation of the facility, whichever is later, and annually thereafter pursuant to 40 CFR 60.54b(f). The operating manual must be kept in a readily accessible location for all persons required to undergo training. [40 CFR 60.54b(e), (f) and (g)]

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SUBSECTION C. SPECIFIC CONDITIONS:

The following specific conditions apply to the indicated emissions unit.

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
-007	Lime Silo
(existing)	Ash and Carbon Handling

EMISSION LIMITATIONS

C.1 Lime & Carbon Silos and Ash Handling System:

Particulate emissions from these emissions units shall be limited as follows:

- (a) PM emissions from the lime storage silo shall be controlled by a baghouse. Visible emissions shall not exceed 5% opacity in accordance with specific condition C.3.
- (b) PM emissions from the activated carbon storage silo exhaust shall be controlled by a baghouse. Visible emissions shall not exceed 5% opacity in accordance with specific condition C.3.
- (c) Visible emissions from the ash conveyor systems, transfer points, buildings, or enclosures of ash conveying systems shall not occur more than 5 percent of the time during the observation period, except during times of maintenance or repair of these systems.
- (d) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. The ash handling facilities shall be enclosed. Residue from the grates, grate siftings, and ash from the combustor/boiler and fabric filter hoppers during normal operations shall be discharged into the ash quenching system, or otherwise handled in a manner to minimize visible dust. The ash/residue in the ash handling building shall remain sufficiently moist to prevent dust during storage and handling operations.

[Rule 62-4.070(3), F.A.C., and 40 CFR 60.55b]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

COMPLIANCE AND PERFORMANCE TESTING

- C.2 **Fugitive Emissions Compliance:** The compliance method for the ash handling facilities shall be EPA Method 22, Visual Determination of Fugitives Emissions From Material Sources.
- (a) The minimum observation time will be three hours, and will include periods when ash is being transferred from the MWC unit to the storage area, and when ash is being loaded for disposal.
- (b) Compliance testing shall be conducted within 180 days of completion of construction and initial operation and annually thereafter.
[Rule 62-4.070(3), F.A.C., and 40 CFR 60.55b]
- C.3. **Carbon and Lime Storage Silos PM Compliance Requirements:** Compliance testing for the lime and carbon silos shall be conducted within 180 days of completion of construction and initial operation and annually thereafter. The visible emission tests shall be performed for each silo during filling operations using EPA Method 9. Permanent stack testing facilities are not required for the lime and carbon silos. The owner or operator may install temporary stack sampling facilities to conduct such a test, if required.
[Rule 62-297.620(4), F.A.C.]

AIR CONSTRUCTION PERMIT 0710119-002-AC, PSD-FL-151C

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION D. COMMON CONDITIONS:

The following specific conditions apply to the following emissions units.

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
-006	660 Tons per Day nominal MSW Incinerator
-007	Lime Silo
(existing)	Ash and Carbon Handling

OPERATIONAL REQUIREMENTS

- D.1 These emissions units are allowed to operate continuously (8760 hours/year).
[Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE)]

- D.2. Odor Control: No objectionable odors are allowed from this facility. The truck access doors to the unit shall remain closed except during normal working shifts when MSW is being received at the storage pit area. To minimize odors at the unit, a negative pressure shall be maintained on the tipping floor and air from within the building will be used as combustion air. [Rule 62-296.320(2), F.A.C.]

- D.3 Startup/Shutdown/Malfunctions
 - (a) In order to minimize excess emissions during startup/shutdown/malfunction these emissions units shall adhere to best operational practices to minimize emissions.

The duration of excess emissions from the lime silo or the carbon silo shall be minimized but in no case exceed 2 hours per 24 hour period.
[Rule 62-210.700, F.A.C.]

 - (b) 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.]

 - (c) Within 90 days prior to completion of construction of the unit, the owner or operator shall submit to the DEPSD an operational procedures manual that identifies and describes best operational practices that will be used during startup, shutdown, and malfunctions.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

EMISSION LIMITATIONS

- D.4 Facility Fugitive (Unconfined) Emissions: Fugitive emissions at this facility shall be adequately controlled at all times. All roads shall be adequately paved, and vacuum swept if appropriate, to minimize accumulations of ash and dust. Speed limit signs shall be posted. Unprocessed refuse storage areas which must be open for operational purposes (e.g., tipping floor or the refuse bunker while trucks are entering and leaving) shall be under negative air pressure. [Rule 62-296.320(4)(c), F.A.C.]

COMPLIANCE AND PERFORMANCE TESTING

- D.5 Test Notification: The owner or operator shall notify the DEPSD in writing at least *30 days* (for the initial test) and *15 days* (for the annual tests) prior to each scheduled compliance test to allow witnessing. The notification shall include the compliance test date, place of such test, the expected test time, the facility contact person for the test, and the person or company conducting the test. The 30 or 15 day notification requirement may be waived at the discretion of the DEPSD. Likewise, if circumstances prevent testing during the test window specified for the emissions unit, the owner or operator may request an alternate test date before the expiration of this window. [Rule 62-297.310, F.A.C. and 40 CFR 60.8]
- D.6 Special Compliance Tests: When the Department, after investigation, has good reason (such as substantiated complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the DEPSD. [Rule 62-297.310(7)(b), F.A.C.]
- D.7 Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit in operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. See also specific conditions B.2 and B.3 of this permit for limitations related to unit load for the MWC unit. Higher loads are allowed for testing purposes as specified at 40 CFR 60.53b(b) and condition B.3 of this permit. [Rule 62-297.310(2) and (2)(b), F.A.C., and 40 CFR 60.53b(b)]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

RECORD KEEPING AND REPORTING REQUIREMENTS

D.8 Emission Compliance Stack Test Reports:

[Rule 62-297.310(8), F.A.C., and 40 CFR 60.59b(f)]

- (a) A *test report* indicating the results of the required compliance tests shall be filed with the DEPSD as soon as practical, but no later than 60 days after the last sampling run is completed.
- (b) The *test report* shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

APPENDIX BD
SUMMARY OF BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

DEPARTMENT BACT REVIEW

In evaluating BACT, Department Rules (62-212, F.A.C.) require that the Department must give consideration to:

- a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169 of the Clean Air Act, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- b) All scientific, engineering, and technical material and other information available to the Department.
- c) The emission limiting standards or BACT determinations of any other state.
- d) The social and economic impact of the application of such technology.

During the pre-application process, Lee County (through its consultant, RTP Environmental Associates, Inc.) provided a statistical analysis of emission data from the existing Lee County MSW units. This data was intended to indicate appropriate limits for establishing BACT, suggesting the setting of BACT emission limits at a Six Sigma Upper Prediction Limit (UPL) or other statistical basis, unless the NSPS is lower. According to the submittal, the Six Sigma UPL should correspond to a predicted failure (exceedance) rate of once every 125 years. The Department takes no issue with the mathematical accuracy of the analysis, but finds it to be an unacceptable means of establishing BACT emission limits, for multiple reasons. The legislative history is clear, that Congress intended BACT to perform a technology-forcing function. With this in mind, the Department will attempt to utilize the relevant portions of the analysis in the establishment of BACT emission limits.

Additionally, Eastern Research Group conducted a study entitled Compliance Test Data Analysis For Lee County Solid Waste Resource Recovery Facility in September of 2002 for the EPA. EPA Region IV provided this study to the Department for use as appropriate. As indicated above, the Department will utilize relevant portions of this study, as it sees fit in the establishment of BACT.

NO_x Summary

The applicant supplied cost analyses for SCR to the Department, concluding that the cost of that NO_x control technology may be greater than \$13,000 per ton of NO_x removed. These analyses were reviewed by the Department and rejected for multiple reasons, although many questions remain as to an accurate cost effectiveness calculation. Cost effectiveness values exceeding \$10,000 per ton are not considered within the range of cost effectiveness by EPA or FDEP.

The Department has reached no definitive conclusion as to the appropriate cost effectiveness of SCR and will continue to investigate it prior to evaluating the application of additional MWC's in Florida. However, FDEP does not accept the applicant's proposal of a conventional SNCR (meeting the NSPS) as BACT. However, the Department notes that:

- a) No large-scale refuse burning WTE facilities have been permitted in Florida for over a decade. During this time, a number of landfills have been permitted in the US and Florida.

APPENDIX BD

SUMMARY OF BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

- b) Consideration is given to the social impacts of landfilling versus combusting waste. In the EU waste disposal hierarchy, WTE is regarded as a form of recycling of energy and is considered preferable to landfill disposal, though less preferable than primary recycling of waste products. As a growing state, it is important for the State of Florida to ensure that a balance is achieved between the alternatives of landfilling and burning of waste. During the past 10 years, that balance has not been achieved.

Given the above factors, this facility's past excellent environmental performance (with respect to air pollution) along with the apparent capabilities of advanced SNCR systems, justification *is* warranted to authorize the use of such an advanced SNCR for NO_x control. The advanced SNCR will use furnace pyrometry and additional process enhancements, such that high NO_x reductions can be achieved without excessive amounts of ammonia slip or other unwanted byproduct gases. According to EPA's document EPA/600/SR-94/208, such a system requires less reagent than that required for conventional SNCR and should achieve 60% NO_x reductions (an approximate Lee County emission equivalent of 104 ppmvd @ 7% O₂).

An additional factor considered by the Department is that on September 9, 1999 the State of Illinois issued a permit to West Suburban Recycling and Energy Center, L.P. for the construction of two 900 TPD MWC's, with NO_x emission limits of 100 ppmvd on a 24 hour average. Lastly, based upon the touted guarantees of the Martin GmbH SNCR (http://www.martingmbh.de/englisch/technologie/e_sncr.htm) NO_x emissions are achievable at levels approaching 60 ppm, and three European facilities (Brescia, London SELCHP and Limmattal) have guarantees averaging 106 ppm. Similar to Martin, Von Roll (a Swiss company) is a major builder of plants in Europe, with Wheelabrator as the domestic licensee. In discussions with Von Roll, NO_x emissions at or below 100 ppmvd are also guaranteeable.

In consideration of all of the above items, a BACT emission limit of 110 ppmvd @ 7% O₂ shall be established on a 30-day rolling average. As an additional means of achieving this limit, the Department encourages the applicant to consider the application of flue gas recirculation (http://www.martingmbh.de/englisch/technologie/e_abgasrezirk.htm) as well as water-cooled grates (http://www.martingmbh.de/englisch/technologie/e_gek_rost.htm), both of which have been developed by Martin GmbH. The application of water-cooled grates allows for a higher percentage of overfire air, in turn enabling lower combustion temperatures and therefore better control of NO_x. Lastly, the Department notes that the latest advances to the Martin GmbH combustion control system (e.g. SYNCOM - http://www.martingmbh.de/englisch/technologie/e_syncom.htm) may be designed to incorporate many of the features identified herein, such as FGR and the use of furnace temperature optimize oxygen distribution in the combustion zone. Although not yet fully commercialized, such a system is likely applicable for this installation.

CO Summary

State-of-the-art mass burn waterwall MWC's have inherently stable combustion characteristics and low CO levels. A 100-ppm CO emission limit with a 4-hour averaging time has been established as the NSPS for these types of units. In an EPA sponsored test at a mass burn combustor in Marion County, Oregon in 1987, the combustor was subjected to a number of different operating conditions including changes to the under-to-overfire air ratio and the overfire air distribution. CO concentrations at the inlet to the unit's spray dryer never exceeded 37 ppm and emissions under normal operating conditions were typically less than 20 ppm. While the unit was not attempting to control CO, the computerized distributed combustion control system maintained high combustion

APPENDIX BD
SUMMARY OF BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

efficiency and low concentrations of CO. Evaluation of long term emission data from other state-of-the-art mass burn waterwall facilities indicate that these types of facilities can achieve a 100 ppm CO emission limit on a 4-hour basis. In most cases these mass burn combustors will operate at long term averages of less than 50 ppm to comply with the 100 ppm (4 hour) emission limit. Experience indicates that operation at CO concentrations between 50 and 100 ppm may be required due to problems associated with the burning of wet waste. The Department will establish two CO limits as BACT, the NSPS as well as a 30-day rolling average of 80 ppmvd @ 7% O₂.

SO₂, SAM and PM Summary

The NSPS limit for SO₂ is 30 ppmvd at 7% O₂ on a 24-hour average, or an 80% reduction in SO₂ on a 24-hour average. Since the 24-hour CEMS data as well as the 3-run stack test averages for SO₂ at the existing Lee County units was 25 ppm or less, the Department will set the SO₂ emission limit at 26 ppmvd @ 7% O₂ on a 24-hour average, or an 80% reduction. The SAM limit will be reduced from the applicant's proposal by an amount equivalent to the SO₂ reduction which the Department has established (a ratio of 26/30) for an equivalent limit of 15 ppmvd @ 7% O₂.

The NSPS for PM is 24 mg/dscm. The Department agrees with the applicant's proposed BACT for PM of 20.6 mg/dscm, which is 90% of the equivalent PM limit (22.88 mg/dscm) on the existing emission units.

Mercury Summary

The applicant proposed the NSPS of 70 mg/dscm at 7% O₂ as the appropriate BACT limit. However, the Department is aware that many states in the northeast U.S. have established 28 mg/dscm at 7% O₂ as the standard for large MWC's. In fact, the Department review revealed that at least 15 N.E. facilities with large MWC's (of varying vintage, size and design) are required to meet such a limit, and six of these facilities are Covanta-operated. Three of these facilities (Bristol/Connecticut, Union/New Jersey and Haverhill/Massachusetts) are of the Martin design and use a combination of a mercury separation plan plus carbon injection to meet the subject limit. The Department will establish 28 mg/dscm as BACT and allow a 12-month period during which quarterly testing and carbon injection optimization shall be completed while meeting only the NSPS. Permit conditions will describe a means of allowing for occasional sample spikes.

Dioxins and Furans Summary

A review of past data suggests that 13 ng/dscm at 7% O₂ for dioxins and furans (MWC organics) represents an appropriate level of BACT for this unit. These are the emission limits proposed by the applicant and are lower than those of any other existing waste incinerator within Florida.

HCl, Pb, Cd and HFl

The Department accepts the applicant's analysis for these 4 pollutant emissions. Specifically, emission limits of 25 ppmvd (or 95% removal), 0.2 mg/dscm, 0.02 mg/dscm and 3.5 ppmvd for HCl, Pb, Cd and HFl (respectively), all corrected to 7% O₂. However, the limit for Cadmium is not established via this BACT review.

APPENDIX BD
SUMMARY OF BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

The following table represents a summary of the BACT Determination for this project:

Pollutant Name	Standard(s)	Lbs/hour	TPY
Particulate Matter (PM ₁₀)	20.6 mg/dscm, corrected to 7% O ₂	5.12	22.3
MWC Metals (PM)	20.6 mg/dscm, corrected to 7% O ₂	5.12	22.3
Sulfur Dioxide (SO ₂)	26 ppm, or 80% reduction, at 7% O ₂	56.9	249.4
Sulfuric Acid Mist	15 ppmvd @ 7% O ₂	15.1	66.1
Nitrogen Oxides (NO _x)	110 ppm @ 7% O ₂ - 12-month rolling avg. 140 ppm @ 7% O ₂ - 12-month rolling avg. * 150 ppm @ 7% O ₂ - 24 hour average	70.8	289.4
Carbon Monoxide (CO)	80 ppm @ 7% O ₂ - 30-day rolling average 100 ppm @ 7% O ₂ - 4 hr average	23.0 28.73	100.6
Mercury (Hg)	0.028 mg/dscm @ 7% O ₂ or 85% reduction ⁽¹⁾	0.0168	0.0736
Visible Emissions (VE)	10 %, 6 minute average		
Lead (Pb)	0.2 mg/dscm, corrected to 7% O ₂	0.05	0.22
MWC Acid Gas (HCl)	25 ppm or 95% reduction @ 7% O ₂ ⁽¹⁾	46.76	204.8
Hydrogen Fluoride (HF)	3.5 ppmvd @ 7% O ₂	0.718	3.145
Dioxin/Furan (PCDD/F)	13 ng/dscm, corrected to 7% O ₂	3.2 x 10 ⁻⁶	1.4 x 10 ⁻⁵
Ammonia	15 ⁽²⁾ / 30 ppmvd @ 7% O ₂ 50 ppmvd @ 7% O ₂ *		

Notes to table:

* - For the 12-month calendar period following initial operation only.

Abbreviations

ug/dscm: Micrograms per dry standard cubic meter

mg/dscm: Milligrams per dry standard cubic meter

ng/dscm: Nanograms per dry standard cubic meter

ppm: Part per million dry volume

Dioxins/ furans: Total tetra through octa-chlorinated dibenzo-p-dioxins and dibenzofurans

Note (1) Whichever standard is less stringent.

Note (2) Design Standard.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

A. A. Linero, P.E. Administrator, New Source Review Section

Deborah Nelson, Meteorologist, New Source Review Section

Michael P. Halpin, P.E. Review Engineer

Department of Environmental Protection

Bureau of Air Regulation

2600 Blair Stone Road

Tallahassee, Florida 32399-2400

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology (X)
 - b) Determination of Prevention of Significant Deterioration (X); and
 - c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Adams, Patty

From: Harvey, Mary
Sent: Monday, January 22, 2007 1:12 PM
To: 'dcastro@hdrinc.com'; 'kirk.dunbar@hdrinc.com'; Iglehart, Jon; Halpin, Mike
Cc: Mulkey, Cindy; Adams, Patty; Gibson, Victoria
Subject: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC
Attachments: 0710119.005.AC.D_pdf.zip

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Harvey, Mary
Sent: Tuesday, January 23, 2007 9:43 AM
To: Adams, Patty
Subject: FW: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

From: Castro, Don [mailto:Don.Castro@hdrinc.com]
Sent: Tuesday, January 23, 2007 9:24 AM
To: Harvey, Mary
Subject: RE: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

Received with thanks.

Don Castro, P.E.

HDR Engineering, Inc.
2202 N. West Shore Blvd.
Tampa, FL 33607
Telephone 813 282 2404
Facsimile: 813 282 2440
Cellular: 813 417 6594

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, January 22, 2007 1:12 PM
To: Castro, Don; Dunbar, Kirk; Iglehart, Jon; Halpin, Mike
Cc: Mulkey, Cindy; Adams, Patty; Gibson, Victoria
Subject: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

1/26/2007

Adams, Patty

From: Harvey, Mary
Sent: Monday, January 22, 2007 1:41 PM
To: Mulkey, Cindy; Adams, Patty
Subject: FW: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

From: Iglehart, Jon
Sent: Monday, January 22, 2007 1:19 PM
To: Harvey, Mary
Subject: Read: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

Your message

To: 'dcastro@hdrinc.com'; 'kirk.dunbar@hdrinc.com'; Iglehart, Jon; Halpin, Mike
Cc: Mulkey, Cindy; Adams, Patty; Gibson, Victoria
Subject: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC
Sent: 1/22/2007 1:12 PM

was read on 1/22/2007 1:19 PM.

Adams, Patty

From: Harvey, Mary
Sent: Monday, January 22, 2007 4:19 PM
To: Adams, Patty; Mulkey, Cindy
Subject: FW: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

From: Dunbar, Kirk [<mailto:Kirk.Dunbar@hdrinc.com>]
Sent: Monday, January 22, 2007 4:16 PM
Subject: Read: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

Your message

To: Kirk.Dunbar@hdrinc.com
Subject:

was read on 1/22/2007 4:16 PM.

Adams, Patty

From: Harvey, Mary
Sent: Monday, January 22, 2007 1:41 PM
To: Mulkey, Cindy; Adams, Patty
Subject: FW: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

From: Halpin, Mike
Sent: Monday, January 22, 2007 1:33 PM
To: Harvey, Mary
Subject: Read: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC

Your message

To: 'dcastro@hdrinc.com'; 'kirk.dunbar@hdrinc.com'; Iglehart, Jon; Halpin, Mike
Cc: Mulkey, Cindy; Adams, Patty; Gibson, Victoria
Subject: Lee County Resource Recovery Facility - Facility Permit #0710119-005-AC
Sent: 1/22/2007 1:12 PM

was read on 1/22/2007 1:32 PM.



LEE COUNTY
SOUTHWEST FLORIDA

BOARD OF COUNTY COMMISSIONERS

Bob Janes
District One

January 16, 2007

A. Brian Bigelow
District Two

Mr. Alvaro Linero

Ray Judah
District Three

Professional Engineer Administrator
Florida Department of Environmental Management

Tammy Hall
District Four

Division of Air Resource Management

Frank Mann
District Five

2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Also Via Fax 850-921-9533

RECEIVED

JAN 18 2007

BUREAU OF AIR REGULATION

Donald D. Stilwell
County Manager

**RE: Lee County Waste to Energy Plant, PSD-FL-151C
Unit 3 Construction Permit Extension Request**

David M. Owen
County Attorney

Diana M. Parker
County Hearing
Examiner

Dear Mr. Linero:

The Lee County Waste to Energy Plant is currently constructing a third municipal waste combustor (Unit 3) as authorized by Permit No. 0710119-002-AC (PSD No. PSD-FL-151C). The construction permit expires on December 31, 2006. As we have discussed in a recent telephone conversation, construction of Unit 3 was not completed as of the permit expiration date and an extension of the permit term is requested.

Unexpected time associated with a number of items critical to the project contributed to the need for this extension request. Most of these items are related to procurement of major equipment and contract services. It is unfortunate that much of the specific equipment and specialty services required for a modern waste to energy facility are no longer readily available in this country. Examples of equipment that we purchased from foreign countries include the stoker, the turbine, the generator, the general step-up transformer, and the boiler feed-water pumps. Additionally, (and likely because it has been more than ten years since a similar project of this magnitude has been constructed in this country), we had difficulty finding qualified contractors (qualified in experience and with financial stability) to perform the 'balance of plant work'. Other specific areas of unexpected additional time required for this project are summarized as follows:

- Finalizing the agreement with Covanta to perform construction management services,
- Burns and Roe finalization of the design engineering documents,
- Finalization of terms and conditions with Riley Power for the boiler design, supply and erection,
- Finalization of terms and conditions with Mitsubishi for the turbine/generator,
- Finalization of terms and conditions with Alstom Power for the air pollution control equipment, and

Mr. Al Linero
January 16, 2007
Page 2 of 2

- Shipping and receipt of the turbine generator.

I have separately sent you a copy of a recent monthly construction report and progress photographs of the project. Construction is progressing well now that all of the procurement issues and delays are behind us. Based upon the current project status, Lee County anticipates completion of construction, start-up, performance testing, and initial stack testing required by the permit, prior to December 31, 2007 and requests that FDEP grant an extension of the Unit 3 construction permit to that date.

Thank you in advance for your assistance in resolving this matter. Should you have any questions or need further information, please contact me at (239-338-3302) or Mr. M. Kirk Dunbar of HDR Engineering, Inc. at (763-591-5476).

Sincerely,



Lindsey J. Sampson, Director
Solid Waste Division

cc: J. Lavender, PW Director
D. Owen, Co. Att'y.
D. Castro - HDR Engineering, Inc.
K. Dunbar - HDR Engineering, Inc.



LEE COUNTY

SOLID WASTE DIVISION

Phone: 239-338-3302

Fax: 239-461-5871

10500 Buckingham Rd.

Fort Myers, FL 33905

FACSIMILE

DATE: 1-16-07

TO: MR AL LINERO

FROM: LINDSEY CAMPSON

FAX #: 850 - 921 - 9533

Number of pages including cover: 3

Hard copy to follow: N Y

MESSAGE: Request for PSD Permit Extension

*Pa. Hypo
faxed version.
Sitt*

0710 119-005-AC

Please contact this office immediately if transmittal is not received properly.
Thank You.



Covanta Lee, Inc.
A Covanta Energy Company
10500 Buckingham Road
Fort Myers, FL 33905
Tel 239 337 2200
Fax 239 337 2510

August 11, 2006

Mr. Joe Kahn, Acting Director
Division of Air Resource Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Final Title V Permit No. 0710119-003-AV
2006 Compliance Test Report

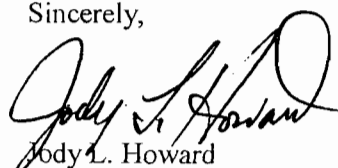
Dear Mr. Kahn,

Attached please find the executive summary report, confidential process data, one copy of the tester's report on compact disc for the compliance test performed at the Lee County Solid Waste Resource Recovery Facility. Stack testing on both MWC Units was conducted on June 27, 2006 and June 28, 2006. This testing was performed in accordance with the source test protocol (COV Report #3104).

Also enclosed please find a compact disc copy of the relative accuracy test audit (RATA) report on the continuous emission monitoring system for the second quarter of 2006. This report also satisfies the data assessment report requirement for the second quarter of 2006 with the exception of Section II- calibration drift assessment that was included, if applicable, in the facility's excess emission report.

If you have any questions regarding the enclosed material, please feel free to contact me. I can be reached during the day at (239) 337-2200 Ext. 4.

Sincerely,


Jody L. Howard
Facility Manager

cc: R. Blackburn, FDEP-SD (w/ 1 CD and 1 Paper.)
E. Sampson, EC/SWMD (w/ 1 CD and 1 Paper.)
B. Macionski, Covanta (w/ 1 CD)
File (w/ 1 CD and 1 Paper.)

Stack Test Letter 2006

Covanta Lee, Inc.
A Covanta Energy Company
10500 Buckingham Road
Fort Myers, FL 33905
Tel 239 337 2200
Fax 239 337 2510

ENVIRONMENTAL TEST REPORT

VOLUME I

EXECUTIVE SUMMARY - COV REPORT NO. 3140

August 11, 2006

PREPARED FOR: Covanta Lee, Inc.
10500 Buckingham Road
Suite 400
Ft. Myers, FL 33905

REGULATORY AGENCY: Florida Department of Environmental Protection
Title V Permit No. 0710119-003-AV.

TEST DATES: June 27 - June 28, 2006

ASSOCIATED REPORT: COV Report No. 3140

PREPARED BY: Covanta Lee, Inc.

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 <u>VOLUME 2:</u>	 Testar, Inc. - Compliance Testing (Bound Separately)
 <u>VOLUME 3:</u>	 Confidential Process Data (Bound Separately)

1.0 INTRODUCTION

This Executive Summary is intended to present data collected during the test program which demonstrates compliance with permit emission limits. All test procedures conducted during the test program are listed in the Section 3.0, Schedule of Activities (Table 3.2). The testing Contractor Report (Volume 2) includes all data gathered at the site and all laboratory analytical data. A review of both the Executive Summary and Contractor Report should be done for complete understanding of the test program.

Covanta Lee, Inc. performed compliance emission tests at the Lee County Solid Waste Resource Recovery Facility from June 27-28, 2006. The objective of this test program was to demonstrate compliance with the emission limit provisions of the Florida Department of Environmental Protection Title V, Permit No. 0710119-003-AV. The testing was performed by TESTAR, Inc. in accordance with procedures in the test protocol.

The Lee County Solid Waste Resource Recovery Facility is located in Ft. Myers, FL. The facility consists of two identical municipal solid waste-fired boilers of Martin GmbH Stoker Combustion System design. The facility is nominally rated at 1320 tons of municipal solid waste per day (660 TPD/boiler) and generates approximately 40 megawatts of electricity.

A summary of emission test results for Units 1 and 2 is presented in Section 2.0, Tables 2.1-2.4. A complete summary of all data and events that occurred during the test program is presented in the Contractor Report.

The test program, as indicated in the Source Test Plan (COV Report No. 3104) is presented in Section 3.0, Table 3.1. The Schedule of Activities at the site is presented in Table 3.2. Test observers and test participants are presented in Table 3.3. The maximum demonstrated particulate matter device inlet temperature, carbon injection rate and steam rate is presented in the Appendix A.

Arsenic, beryllium, fluoride, sulfuric acid mist, ammonia and VOC parameters were tested during the 2000 base year compliance tests. These parameters were tested again prior to the renewal of the Title V permit during the 2005 base year.

2.0 SUMMARY OF RESULTS

TABLE 2.1

SUMMARY OF SOURCE TEST RESULTS - UNIT 1

Unit #1 SDA Inlet Concentrations					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Hydrogen Chloride, ppm @ 7% O ₂	769	727	736	744	NA
Mercury, ug/DSCM @ 7% O ₂	104	242	115	154	NA
Sulfur Dioxide, ppmvd @ 7% O ₂	52.9	93.8	85.6	77.4	NA

Unit #1 Stack Concentrations					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide, ppm @ 7% O ₂	8.0	7.4	8.0	7.8	100
Dioxins/Furans, ng/DSCM @ 7% O ₂	12.2	11.8	11.2	11.7	30
Hydrogen Chloride, ppm @ 7% O ₂	27.6	23.0	18.3	23.0	25
Mercury, ug/DSCM @ 7% O ₂	28.8	23.5	27.8 ⁽²⁾	26.7	70
Cadmium, mg/DSCM @ 7% O ₂	0.00159	0.00233	0.00221 ⁽²⁾	0.00205	0.040 ^a
Lead, mg/DSCM @ 7% O ₂	0.0166	0.0237	0.0188 ⁽²⁾	0.0197	0.440 ^a
Nitrogen Oxides, ppm @ 7% O ₂	151.7	154.7	160.2	155.5	180
Particulate, Gr/DSCF @ 7% O ₂	0.00118	0.00131	0.00138 ⁽²⁾	0.00129	0.010
Sulfur Dioxide, ppm @ 7% O ₂	1.6	0.3	0.2	0.7	29

⁽¹⁾ Run number used in this report for valid data. Actual field replicate number may vary owing to conditions existing at site.

⁽²⁾ Conducted under normal soot blowing conditions.

TABLE 2.1 A

SUMMARY OF SOURCE TEST RESULTS - UNIT 1

Unit #1 Stack Emission Rates, lb/hr					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide	2.4	2.2	2.4	2.3	27.2
Dioxins/Furans	3.07E-06	2.78E-06	2.67E-06	2.84E-06	7.0E-06
Hydrogen Chloride	10.2	8.57	6.69	8.49	17.70
Mercury	0.00702	0.00578	0.00670 ⁽¹⁾	0.00650	0.0379
Cadmium	0.000389	0.000573	0.000532 ⁽¹⁾	0.000498	NA
Lead	0.00406	0.00583	0.00452 ⁽¹⁾	0.00480	0.165
Nitrogen Oxides	73.8	74.2	80.1	76.0	80
Particulate	0.659	0.738	0.760 ⁽¹⁾	0.719	5.34
Sulfur Dioxide	1.1	0.2	0.1	0.5	41

⁽¹⁾ Conducted under normal soot blowing conditions.

TABLE 2.1 B

SUMMARY OF SOURCE TEST RESULTS - UNIT 1

Unit #1 Stack Emission Rates, Ton/Year					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide ⁽¹⁾	10.5	9.6	10.5	10.5	108
Dioxins/Furans ⁽¹⁾	1.34E-05	1.22E-05	1.17E-05	1.34E-05	2.80E-05
Hydrogen Chloride ⁽¹⁾	44.7	37.5	29.3	44.7	70.7
Mercury ⁽¹⁾	0.0307	0.0253	0.0293 ⁽²⁾	0.0307	0.166
Cadmium ⁽¹⁾	0.0017	0.0025	0.0023 ⁽²⁾	0.0017	NA
Lead ⁽¹⁾	0.0178	0.0255	0.0198 ⁽²⁾	0.0178	0.66
Nitrogen Oxides ⁽³⁾	283	285	308	292	320
Particulate ⁽¹⁾	2.886	3.232	3.329 ⁽²⁾	2.886	21.3
Sulfur-Dioxide ⁽¹⁾	4.8	0.9	0.4	4.8	163.3

⁽¹⁾ The ton/yr emission rate is based on 8,760 hr/yr, which is derived from 100% boiler availability during the year. The facility did not operate at 100% boiler availability during the 2005 calendar year. Thus, the actual emissions in tons per year are less than the value above based upon actual boiler availability.

⁽²⁾ Conducted under normal soot blowing conditions.

⁽³⁾ The ton/yr emission rate is based on 7679 hr/yr, the actual 2005 boiler operating hours.

TABLE 2.1 C

SUMMARY OF SOURCE TEST RESULTS - UNIT 1

Unit #1 Stack Emission Rates, lb/MMBtu					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide	0.008	0.008	0.008	0.008	0.10
Dioxins/Furans	1.10E-08	1.06E-08	1.00E-08	1.05E-08	2.54E-08
Hydrogen Chloride	0.0376	0.0313	0.0250	0.0313	0.644
Mercury	0.0000259	0.0000211	0.0000250 (2)	0.0000240	0.000138
Cadmium	1.43E-06	2.10E-06	1.98E-06 (2)	1.84E-06	NA
Lead	0.0000149	0.0000213	0.0000169 (2)	0.0000177	0.00060
Nitrogen Oxides	0.261	0.266	0.275	0.267	0.290
Sulfur Dioxide	0.0038	0.0007	0.0004	0.0016	0.150

(1) Calculated based on an F_d factor of 9570 dscf/10⁶ Btu (40 CFR 60 Appendix A, Method 19, Section 3.1).

(2) Conducted under normal soot blowing conditions.

TABLE 2.1 D

SUMMARY OF SOURCE TEST RESULTS - UNIT 1

Unit #1 Removal Efficiency %					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
HCl RE%, ppm @ 7% O ₂	96.4	96.8	97.5	96.9	≥95%
Mercury RE%, ug/DSCM @ 7% O ₂	72.3	90.3	75.8	79.5	≥85%
Mercury RE%, lb/hr	71.8	89.9	75.3	79.0	≥85%
Sulfur Dioxide RE%, ppm @ 7% O ₂	97.0	99.7	99.8	98.8	≥80%

- (1) Removal efficiencies are alternative compliance limit that can be satisfied to demonstrate compliance with a pollutant's emission standard.

TABLE 2.2

SUMMARY OF SOURCE TEST RESULTS - UNIT 2

Unit #2 SDA Inlet Concentrations					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Hydrogen Chloride, ppm @ 7% O ₂	723	813	711	749	NA
Mercury, ug/DSCM @ 7% O ₂	72.6	99.9	91.0	87.8	NA
Sulfur Dioxide, ppmvd @ 7% O ₂	118.8	124.6	106.1	116.5	NA

STACK

Unit #2 Stack Concentrations					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide, ppm @ 7% O ₂	10.4	9.9	9.0	9.8	100
Hydrogen Chloride, ppm @ 7% O ₂	23.1	24.2	23.2	23.5	25
Mercury, ug/DSCM @ 7% O ₂	21.0	21.0 ⁽²⁾	19.5	20.5	70
Cadmium, mg/DSCM @ 7% O ₂	0.00086	0.00072 ⁽²⁾	0.00027	0.00061	0.040 ^a
Lead, mg/DSCM @ 7% O ₂	0.00739	0.00732 ⁽²⁾	0.00168	0.00546	0.440 ^a
Nitrogen Oxides, ppm @ 7% O ₂	144.7	144.2	142.1	143.7	180
Particulate, Gr/DSCF @ 7% O ₂	0.00123	0.00146 ⁽²⁾	0.000975	0.00122	0.010
Sulfur Dioxide, ppm @ 7% O ₂	0.4	1.8	0.4	0.9	29

(1) Run number used in this Executive Summary is used to represent valid data. Actual field replicate number may vary owing to conditions existing at site.

(2) Conducted under normal soot blowing conditions.

TABLE 2.2 A**SUMMARY OF SOURCE TEST RESULTS - UNIT 2**

Unit #2 Stack Emission Rates, lb/hr					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide	3.3	3.1	2.8	3.1	27.2
Hydrogen Chloride	9.23	9.70	9.24	9.39	17.70
Mercury	0.00554	0.00553 ⁽¹⁾	0.00507	0.00538	0.0379
Cadmium	0.000226	0.000190 ⁽¹⁾	0.0000688	0.000162	NA
Lead	0.00195	0.00193 ⁽¹⁾	0.000436	0.00144	0.165
Nitrogen Oxides	74.4	73.4	72.5	73.4	80
Particulate	0.743	0.881 ⁽¹⁾	0.579	0.734	5.34
Sulfur Dioxide	0.3	1.8	0.3	0.8	41

⁽¹⁾ Conducted under normal soot blowing conditions.

TABLE 2.2 B

SUMMARY OF SOURCE TEST RESULTS - UNIT 2

Unit #1 Stack Emission Rates, Ton/Year					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide ⁽¹⁾	14.5	13.6	12.3	13.4	108
Hydrogen Chloride ⁽¹⁾	40.4	42.5	40.5	41.1	70.7
Mercury ⁽¹⁾	0.0243	0.0242 ⁽²⁾	0.0222	0.0236	0.166
Cadmium ⁽¹⁾	0.0010	0.0008 ⁽²⁾	0.0003	0.0007	NA
Lead ⁽¹⁾	0.0085	0.0085 ⁽²⁾	0.0019	0.0063	0.66
Nitrogen Oxides ⁽³⁾	284	280	276	280	320
Particulate ⁽¹⁾	3.25	3.86 ⁽²⁾	2.54	3.22	21.3
Sulfur Dioxide ⁽¹⁾	1.3	7.9	1.3	3.5	163.3

1) The ton/yr emission rate is based on 8,760 hr/yr, which is derived from 100% boiler availability during the year. The facility did not operate at 100% boiler availability during the 2005 calendar year. Thus, the actual emissions in tons per year are less than the value above based upon actual boiler availability.

2) Conducted under normal soot blowing conditions.

3) The ton/yr emission rate is based on 7625 hr/yr, the actual 2005 boiler operating hours.

TABLE 2.2 C

SUMMARY OF SOURCE TEST RESULTS - UNIT 2

Unit #2 Stack Emission Rates, lb/MMBtu					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
Carbon Monoxide	0.011	0.010	0.009	0.010	0.10
Hydrogen Chloride	0.0314	0.0330	0.0315	0.0320	0.644
Mercury	0.0000189	0.0000189 ⁽²⁾	0.0000176	0.0000184	0.000138
Cadmium	7.71E-07	6.47E-07 ⁽²⁾	2.38E-07	5.52E-07	NA
Lead	6.64E-06	6.58E-06 ⁽²⁾	1.51E-06	4.91E-06	0.00060
Nitrogen Oxides	0.249	0.248	0.244	0.247	0.290
Sulfur Dioxide	0.0010	0.0043	0.0011	0.0018	0.150

(1) Calculated using an F_d factor of 9570 dscf/10⁶ Btu (40 CFR 60 Appendix A, Method 19, Section 3.1).

(2) Conducted under normal soot blowing conditions.

TABLE 2.2 D

SUMMARY OF SOURCE TEST RESULTS - UNIT 2

Unit #2 Removal Efficiency %					
Parameter	Run 1	Run 2	Run 3	Average	Permit Limit
HCl RE%, ppm @ 7% O ₂	96.8	97.0	96.7	96.9	≥95%
Mercury RE%, ug/DSCM @ 7% O ₂	71.1	79.0	78.6	76.2	≥85%
Mercury RE%, lb/hr	69.4	76.3	75.9	73.8	≥85%
Sulfur Dioxide RE%, ppm @ 7% O ₂	99.7	98.6	99.6	99.3	≥80%

- (1) Removal efficiencies are alternative compliance limit that can be satisfied to demonstrate compliance with a pollutant's emission standard.

TABLE 2.3

SUMMARY OF SOURCE TEST RESULTS - DIOXINS AND FURANS - UNIT 1 ⁽¹⁾

Unit #1 - Summary					
Units	Run 1	Run 2	Run 3	Average	Permit Limit
ng/DSCM @ 7% O ₂	12.2	11.8	11.2	11.7	30
lbs/hr	3.07E-06	2.78E-06	2.67E-06	2.84E-06	7.0E-06
tons/year	1.34E-05	1.22E-05	1.17E-05	1.34E-05	2.80E-05
Lbs/MM BTU	1.10E-08	1.06E-08	1.00E-08	1.05E-08	2.54E-08

⁽¹⁾ Results are based on total Dioxins and Furans (tetra thru octa-chlorinated dioxins and furans).

⁽²⁾ The ton/yr emission rate is based on 8,760 hr/yr, which is derived from 100% boiler availability during the year. The facility did not operate at 100% boiler availability during the 2005 calendar year. Thus, the actual emissions in tons per year are less than the value above based upon actual boiler availability.

⁽³⁾ Calculated using an F_d factor of 9570 dscf/10⁶ Btu (40 CFR 60 Appendix A, Method 19, Section 3.1).

TABLE 2.4

SUMMARY OF SOURCE TEST RESULTS - Visible and Fugitive Emissions

Pollutant	----- RUN -----			Average	Permitted Maximum Emission Limit
	1	2	3		
<u>MWC Unit 1</u> Opacity, %	0	0	0	0	10
<u>MWC Unit 2</u> Opacity, %	0	0	0	0	10
<u>Ash Building</u> Opacity, %	0	0	0	0	5
<u>Line Silo</u> Opacity, %	0	0	0	0	5
<u>Ash Handling System</u> Fugitive Emissions, %	0	0	0	0	5

3.0 TEST PROGRAM

TABLE 3.1
TEST PROGRAM

Parameter	Permit Condition	Method	Location	Unit
Particulate Matter (PM) ⁽¹⁾	A.46	EPA Method 5	Stack	1, 2
Sulfur Dioxide (SO ₂)	A.49	EPA Method 6C	Stack	1, 2
Hydrogen Chloride (HCl) ⁽³⁾	A.50	EPA Method 26	Inlet/Stack	1, 2
Carbon Monoxide (CO)	A.56	EPA Method 10	Stack	1, 2
Nitrogen Oxides (NO _x)	A.52	EPA Method 7E	Stack	1, 2
Multi-metals (MMTL) ⁽³⁾	A.47, A.48	EPA Method 29	Stack	1, 2
Mercury ⁽³⁾	A.47	EPA Method 29	Inlet/Stack	1, 2
Dioxins/Furans (PCDD/PCDF) ⁽⁴⁾	A.51	EPA Method 23	Stack	1
Oxygen (O ₂)		EPA Method 3A	Inlet/Stack	1, 2
Carbon Dioxide (CO ₂)				
Sulfuric Acid Mist (SAM)	A.35	EPA Method 8	Stack	1, 2
Opacity ^{(1) (2)}	A.46	EPA Method 9	Stack	1, 2
Opacity	B.4, C.4	EPA Method 9	Ash Bldg., Lime Silo	3, 4
Fugitive Emissions	A.60	EPA Method 22	Ash conveyor	

- 1.) One compliance test run was conducted under normal soot blowing conditions. A sampling duration of 120 minutes was used to ensure that the required volume of gas (60 ft³) is captured.
- 2.) One hour runs were conducted simultaneously with one particulate test run.
- 3.) HCl and Hg were sampled at the inlet and stack locations. Each parameter was sampled at the inlet and outlet simultaneously.
- 4.) In accordance with 60.58b(g)(5)(ii), the alternate testing schedule for dioxin/furan performance testing was conducted on Unit 1. Unit 2 was tested during 2005 compliance testing.
- 5.) Multi-Metals consist of lead and cadmium. (Arsenic and Beryllium are being tested prior to the renewal of the facility's Title V permit.)

TABLE 3.2
SCHEDULE OF ACTIVITIES

Run Date	Run Time	Run Number	Sampling Method	Flue Gas Parameter	Test Location
6/27/2006	0842-1000	Unit #1 FF Outlet	EPA 3A, 6C, 7E, & 10	Sulfur Dioxide, Nitrogen Oxides, and Carbon Monoxide	1-O-CEM-1/2
6/27/2006	0842-1000	Unit #1 SDA Inlet	EPA 3A & 6C	Sulfur Dioxide	1-I-CEM-1/2
6/27/2006	0845-1109	Unit #1 SDA Inlet	EPA M29	Mercury	1-I-M29-1
6/27/2006	0845-1109	Unit #1 Stack	EPA 29	Particulate and Metals	1-S-M29-1
6/27/2006	0845-1405	Unit #1 Stack	EPA M23	Dioxins/Furans	1-S-M23-1
6/27/2006	0846-0946	Unit #1 SDA Inlet	EPA MM26	Hydrogen Chloride	1-I-MM26-1
6/27/2006	0846-0946	Unit #1 Stack	EPA MM26	Hydrogen Chloride	1-S-MM26-1
6/27/2006	0920-1020	Unit #1 Stack	EPA 9	Opacity	1-S-M9-1
6/27/2006	1103-1133	Lime Silo Vent	EPA 9	Opacity	LSV-M9-1
6/27/2006	1106-1219	Unit #1 FF Outlet	EPA 3A, 6C, 7E, & 10	Sulfur Dioxide, Nitrogen Oxides, and Carbon Monoxide	1-O-CEM-4/5
6/27/2006	1106-1219	Unit #1 SDA Inlet	EPA 3A & 6C	Sulfur Dioxide	1-I-CEM-4/5
6/27/2006	1140-1438	Unit #1 SDA Inlet	EPA M29	Mercury	1-I-M29-2
6/27/2006	1140-1438	Unit #1 Stack	EPA 29	Particulate and Metals	1-S-M29-2
6/27/2006	1141-1241	Unit #1 SDA Inlet	EPA MM26	Hydrogen Chloride	1-I-MM26-2
6/27/2006	1141-1241	Unit #1 Stack	EPA MM26	Hydrogen Chloride	1-S-MM26-2
6/27/2006	1232-1345	Unit #1 FF Outlet	EPA 3A, 6C, 7E, & 10	Sulfur Dioxide, Nitrogen Oxides, and Carbon Monoxide	1-O-CEM-6/7
6/27/2006	1232-1345	Unit #1 SDA Inlet	EPA 3A & 6C	Sulfur Dioxide	1-I-CEM-6/7
6/27/2006	1310-1420	Ash Handling System	EPA 22	Fugitive Emissions	M22-1
6/27/2006	1502-1732	Unit #1 SDA Inlet	EPA M29	Mercury	1-I-M29-3

Run Date	Run Time	Run Number	Sampling Method	Flue Gas Parameter	Test Location
6/27/2006	1502-1732	Unit #1 Stack	EPA 29	Particulate and Metals	1-S-M29-3
6/27/2006	1503-1603	Unit #1 SDA Inlet	EPA MM26	Hydrogen Chloride	1-I-MM26-3
6/27/2006	1503-1603	Unit #1 Stack	EPA MM26	Hydrogen Chloride	1-S-MM26-3
6/28/2006	0747-1200	Unit #1 Stack	EPA M23	Dioxins/Furans	1-S-M23-2
6/28/2006	0803-0917	Unit #2 FF Outlet	EPA 3A, 6C, 7E, & 10	Sulfur Dioxide, Nitrogen Oxides, and Carbon Monoxide	2-O-CEM-1/2
6/28/2006	0803-0917	Unit #2 SDA Inlet	EPA 3A & 6C	Sulfur Dioxide	2-I-CEM-1/2
6/28/2006	0823-1112	Unit #2 SDA Inlet	EPA M29	Mercury	2-I-M29-1
6/28/2006	0823-1112	Unit #2 Stack	EPA 29	Particulate and Metals	2-S-M29-1
6/28/2006	0824-0924	Unit #2 SDA Inlet	EPA MM26	Hydrogen Chloride	2-I-MM26-1
6/28/2006	0824-0924	Unit #2 Stack	EPA MM26	Hydrogen Chloride	2-S-MM26-1
6/28/2006	0830-0930	Unit #2 Stack	EPA 9	Opacity	2-S-M9-1
6/28/2006	0950-1020	Ash Building Baghouse	EPA 9	Opacity	ABBV-M9-1
6/28/2006	0956-1101	Unit #2 SDA Inlet	EPA MM26	Hydrogen Chloride	2-I-MM26-2
6/28/2006	0956-1101	Unit #2 Stack	EPA MM26	Hydrogen Chloride	2-S-MM26-2
6/28/2006	1016-1131	Unit #2 FF Outlet	EPA 3A, 6C, 7E, & 10	Sulfur Dioxide, Nitrogen Oxides, and Carbon Monoxide	2-O-CEM-4/5
6/28/2006	1016-1131	Unit #2 SDA Inlet	EPA 3A & 6C	Sulfur Dioxide	2-I-CEM-4/5
6/28/2006	1025-1135	Ash Handling System	EPA 22	Fugitive Emissions	M22-2
6/28/2006	1146-1400	Unit #2 Stack	EPA 29	Particulate and	2-S-M29-2

Run Date	Run Time	Run Number	Sampling Method	Flue Gas Parameter	Test Location
				Metals	
6/28/2006	1146-1407	Unit #2 SDA Inlet	EPA M29	Mercury	2-I-M29-2
6/28/2006	1147-1247	Unit #2 SDA Inlet	EPA MM26	Hydrogen Chloride	2-I-MM26-3
6/28/2006	1147-1247	Unit #2 Stack	EPA MM26	Hydrogen Chloride	2-S-MM26-3
6/28/2006	1147-1302	Unit #2 FF Outlet	EPA 3A, 6C, 7E, & 10	Sulfur Dioxide, Nitrogen Oxides, and Carbon Monoxide	2-O-CEM-6/7
6/28/2006	1147-1302	Unit #2 SDA Inlet	EPA 3A & 6C	Sulfur Dioxide	2-I-CEM-6/7
6/28/2006	1220-1624	Unit #1 Stack	EPA M23	Dioxins/Furans	1-S-M23-3
6/28/2006	1230-1340	Ash Handling System	EPA 22	Fugitive Emissions	M22-3
6/28/2006	1447-1702	Unit #2 SDA Inlet	EPA M29	Mercury	2-I-M29-3
6/28/2006	1447-1703	Unit #2 Stack	EPA 29	Particulate and Metals	2-S-M29-3
6/27/2006	0842-1000	Unit #1 FF Outlet	EPA 3A, 6C, 7E, & 10	Sulfur Dioxide, Nitrogen Oxides, and Carbon Monoxide	1-O-CEM-1/2

TABLE 3.3
TEST PARTICIPANTS

Covanta Energy, Inc.

Daryl Fickling

Covanta Lee, Inc.

Becky Macionski

TESTAR, Inc.

4.0 OPERATIONAL DATA DURING EMISSION TESTING

4.0 OPERATIONAL DATA DURING EMISSION TESTING

Operational data were collected from process recorders connected to plant instruments. The operator logs are in Volume 3.

5.0 METHODOLOGY

TABLE 5.1

REFERENCES

Parameter	Test Method	Reference
PM	EPA 5	40 CFR 60, App. A
SO ₂	EPA 6C	40 CFR 60, App. A
HCl	EPA 26	40 CFR 60, App. A
CO	EPA 10	40 CFR 60, App. A
NO _x	EPA 7E	40 CFR 60, App. A
PCDD/PCDF	EPA 23	40 CFR 60, App. A
O ₂ / CO ₂	EPA 3A	40 CFR 60, App. A
SAM	EPA 8	40 CFR 60, App. A
FL	EPA 13B	40 CFR 60, App. A
NH ₄	CTM-027	Not Applicable
VOCs	EPA 25A	40 CFR 60, App. A
Opacity	EPA 9	40 CFR 60, App. A
MMTL ⁽¹⁾	EPA 29	40 CFR 60, App. A
FE	EPA 22	40 CFR 60, App. A

⁽¹⁾ Multi-metals testing include Pb, Cd, Ar, Be, and Hg.

APPENDIX A: PERMIT REQUIRED PROCESS DATA SUMMARY

**Lee County Solid Waste Resource Recovery Facility
2006 Compliance Stack Test Established Limits**

	Carbon <i>lbs/hr</i>	BH Inlet Temp <i>degress Farenheit</i>	Steam Flow <i>kilo-pounds</i>
Unit #1	33.4	320	188
Unit #2	33.4	320	188

(1) In accordance with 40 CFR 60, Subpart Cb, the maximum fabric filter inlet temperature established is based on a four-hour block average.

(2) In accordance with EPA's Federal Implementation plan guidance, the activated carbon injection rate is established based on a total amount of carbon injected during an eight-hour period.

Maximum Demonstrated Unit Load EPA Method 23 Compliance Stack Test Parameters

Unit #1**	Date	Time	4 Hr Avg.*	Unit #2	Date	Time	4 Hr Avg.*
<u>Unit #1- Run 1</u>	06/27/06	0845-1405	170	<u>Unit #1- Run 1</u>	06/27/06	0845-1405	170
<u>Unit #1- Run 2</u>	06/28/06	0747-1200	170	<u>Unit #1- Run 2</u>	06/28/06	0747-1200	170
<u>Unit# 1- Run 3</u>	06/28/06	1220-1624	171	<u>Unit# 1- Run 3</u>	06/28/06	1220-1624	171

Permitted Limit - 110% of the HFHBA is the Maximum Unit Load

(HFHBA- Highest Four Hour Block Average)

188

kilo pounds/ hour

Permitted Limit - 110% of the HFHBA is the Maximum Unit Load

(HFHBA- Highest Four Hour Block Average)

188

kilo pounds/ hour

*The 4 hour average is based on the average of all the valid 1 minute data collected during the specified Run start time to stop time.

**in accordance with 40 CFR 60.38(b) the facility elected the alternative test schedule for Dioxin/Furan in the 2006 compliance year. Unit #1 was tested. The 2006 conditions used for Unit #1 will apply as the operating limits for Unit #2.

Maximum Demonstrated Particulate Matter Control Device Inlet Temperature EPA Method 23 Compliance Stack Test Parameters

Unit #1**	Date	Time	4 Hr Avg.*
<u>Unit #1- Run 1</u>	06/27/06	0845-1405	290
<u>Unit #1- Run 2</u>	06/28/06	0747-1200	290
<u>Unit# 1- Run 3</u>	06/28/06	1220-1624	290

Unit #2	Date	Time	4 Hr Avg.*
<u>Unit #1- Run 1</u>	06/27/06	0845-1405	290
<u>Unit #1- Run 2</u>	06/28/06	0747-1200	290
<u>Unit# 1- Run 3</u>	06/28/06	1220-1624	290

Permit Limit - 30 deg. Fahrenheit above the HFHBA is the Max. FF Inlet Temp.

(HFHBA- Highest Four Hour Block Average) 320

degrees Fahrenheit

Permit Limit - 30 deg. Fahrenheit above the HFHBA is the Max. FF Inlet Temp.

(HFHBA- Highest Four Hour Block Average) 320

degrees Fahrenheit

*The 4 hour average is based on the average of all the valid 1 minute data collected during the specified Run start time to stop time.

**In accordance with 40 CFR 60.38(b) the facility elected the alternative test schedule for Dioxin/Furan in the 2006 compliance year. Unit #1 was tested. The 2006 conditions used for Unit #1 will apply as the operating limits for Unit #2.

Estimated Carbon Mass Feed Rate

EPA Method 29

Unit #1	Date	Time	Average*
<u>Unit #1 - Run 1</u>	06/27/06	0845-1109	33.4
<u>Unit #1 - Run 2</u>	06/27/06	1140-1438	33.4
<u>Unit #1- Run3</u>	06/27/06	1502-1732	33.4

EPA Method 23

Unit #1**	Date	Time	Average*
<u>Unit #1- Run 1</u>	06/27/06	0845-1405	33.3
<u>Unit #1- Run 2</u>	06/28/06	0747-1200	33.4
<u>Unit# 1- Run 3</u>	06/28/06	1220-1624	33.4

Permitted Limit - operating parameters that are primary indicators of the feed rate must equal the levels documented

33.4
pounds/hour

Permitted Limit - operating parameters that are primary indicators of the feed rate must equal the levels documented

33.4
pounds/hour

***The average carbon injection rate (pounds per hour) is based upon the average of all the valid 1-minute data points collected during the specified Run start time to stop time.**

****In accordance with 40 CFR 60.38(b) the facility elected the alternative test schedule for Dioxin/Furan in the 2006 compliance year. Unit #1 was tested. The 2006 conditions used for Unit #1 will apply as the operating limits for Unit #2.**

Estimated Carbon Mass Feed Rate

EPA Method 29

Unit #2	Date	Time	Average*
<u>Unit #1- Run 1</u>	06/28/06	0823-1112	33.4
<u>Unit #1- Run 2</u>	06/28/06	1146-1400	33.4
<u>Unit# 1- Run 3</u>	06/28/06	1447-1703	33.4

Permitted Limit - operating parameters that are primary indicators of
the feed rate must equal the levels documented

33.4
pounds/hour

EPA Method 23

Unit #2	Date	Time	Average*
<u>Unit #1- Run 1</u>	06/27/06	0845-1405	33.3
<u>Unit #1- Run 2</u>	06/28/06	0747-1200	33.4
<u>Unit# 1- Run 3</u>	06/28/06	1220-1624	33.4

Permitted Limit - operating parameters that are primary indicators of
the feed rate must equal the levels documented

33.4
pounds/hour

*The average carbon injection rate (pounds per hour) is based upon the average of all the valid 1-minute data points collected during the specified Run start time to stop time.

**In accordance with 40 CFR 60.38(b) the facility elected the alternative test schedule for Dioxin/Furan in the 2006 compliance year. Unit #1 was tested. The 2006 conditions used for Unit #1 will apply as the operating limits for Unit #2.



LEE COUNTY
SOUTHWEST FLORIDA
BOARD OF COUNTY COMMISSIONERS

Bob Janes
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David M. Owen
County Attorney

Diana M. Parker
County Hearing
Examiner

March 18, 2008

Mr. Scott Sheplack
Department of Environmental Protection
Bureau of Air Regulations
2600 Blair Stone Rd., MS #5505
Tallahassee, Fl. 32399-2400

**Subject: Lee County Waste To Energy Plant, Waste Tire Combustion Test
PSD Permit No. FI-PSD-151-D**

Dear Mr. Sheplack:

On March 7, 2008, the Lee County WTE facility performed a one-hour test burn combusting municipal solid waste and waste tires in (the new) Combustion Unit No. 3. This test was performed in accordance with Section III, Specific Condition B.24 of the subject permit in order to demonstrate the unit's ability to meet the appropriate emission requirements while burning a 5% (by weight) load of waste tires. Mr. Wayne Lewis, with the DEP's South District Office witnessed the additions of the waste tires to the feed chute during the test period and was provided a copy of the CEM data at that time.

The results provided by the CEM data indicate that all related emissions (i.e. SO₂, Opacity, CO, and NO_x) were all within normal range and that there were no emission exceedences during the test period. Lee County hereby confirms that it has met the requirements of Specific Condition B.24 and that it is now permitted to combust up to 5% by weight of waste tires in all three combustion units at its WTE facility. (Note: combustion tests previously performed for Units 1 and 2.) Record-keeping will also be maintained in accordance with the referenced permit condition.

Attached to this letter please find the following documents:

- 1) Information indicating the number and weight of tires burned and the waste tire feed-rate.
- 2) Summary information indicating the weight of the solid waste burned.
- 3) Copy of crane weight print-out from the charging crane load cells.
- 4) CEM data from the period 09:00 to 11:00 during and after the test period.
- 5) CEM Data Calibration Summary recorded prior to the test period.

RECEIVED

MAR 27 2008

BUREAU OF AIR REGULATION

Mr. Scott Sheplack
March 18, 2008
Page 2 of 2

Lee County appreciates that DEP's representative, Mr. Wayne Lewis, was able to review the performance of this test as requested. Please give me a call at 239-338-3302 if you have any questions.

Sincerely,



Lindsey J. Sampson, Director
Solid Waste Division

w/ Attachments

cc: Mr. Ajaya Satyal, DEP South District
Mr. Wayne Lewis, " "
Mr. George Ball-Ilovera, Covanta Lee
Ms. Becky Maconski, Covanta Lee
Mr. Kirk Dunbar, HDR
II E 105

Lee County Solid Waste Resource Recovery Facility
MWC UNIT #3 Waste Tire Combustion Allowance - TEST BURN

DATE: 3/7/2009 *B*

START TIME: 0910 hours

Weight of Tires: 100 Tires equivalent to 2000 lbs

GENERAL INFO	2.2	<i>Tires per Minute</i>
	20.0	<i>lbs per Tire</i>

<i>Time Interval</i> (minutes)	<i>Tires</i> (Number, #)	<i>Weight of Tires</i> (lbs)	<i>Recorded</i> (Number of Tires)
10	22	433	22
20	22	433	22
30	22	433	22
40	22	433	22
50	22	433	22
60	22	433	22
# Tires Fed in 1-hour	130	2600	132

END TIME: 1009 hours

	Pounds	Tons
Weight of Tires processed in 1-hour	2600	1.3
Weight of Refuse processed in 1-hour	46150	23.075
PERCENTAGE OF TIRES (%)	5.63	5.63

DATE 3/7/2008

<u>Time</u>	<u>Unit # 3</u>	
0910	5700	
0921	7600	
0927	7250	
0932	9050	
0946	8100	
0958	8450	
Total	46,150	<u>lbs</u>
Total	23.075	<u>Tons</u>

09:14 03/07/08
ID 001727
CH 2 AD G+07400 1b

09:17 03/07/08
ID 001727
CH 1 AD G+09100 1b

09:21 03/07/08
ID 001727
CH 3 AD G+07600 1b

09:23 03/07/08
ID 001727
CH 1 AD G+07150 1b

09:27 03/07/08
ID 001727
CH 3 AD G+07250 1b

09:29 03/07/08
ID 001727
CH 2 AD G+07050 1b

09:32 03/07/08
ID 001727
CH 3 AD G+09050 1b

09:35 03/07/08
ID 001727
CH 1 AD G+07200 1b

09:39 03/07/08
ID 001727
CH 2 AD G+08800 1b

09:46 03/07/08
ID 001727
CH 3 AD G+08100 1b

09:49 03/07/08
ID 001727
CH 2 AD G+07700 1b

09:52 03/07/08
ID 001727
CH 1 AD G+05550 1b

09:56 03/07/08
ID 001727
CH 2 AD G+04000 1b

09:58 03/07/08
ID 001727
CH 3 AD G+08450 1b

10:00 03/07/08
ID 001727
HOURLY
CH 1 +00045900 1b
CH 2 +00050850 1b
CH 3 +00046150 1b

10:01 03/07/08
ID 001727
CH 2 AD G+08400 1b
10:03 03/07/08
ID 001727
CH 1 AD G+03100 1b
10:09 03/07/08
ID 001727
CH 3 AD G+08100 1b

Data Summary Report



Use County Solid Waste
Resource Recovery Facility

Company: Covanta Lee, Inc.
10500 Buckingham Road
Fort Myers, FL 33905

Data Group: U3_1 MIN DATA

Report Name: No Title

Start of Report: 03/07/2008 09:00

End of Report: 03/07/2008 11:00

Validation: Valid Data Only

① ② ③ ④ ⑤ ⑥ ← See Below

Group#-Channel#	G7-C9	G7-C10	G7-C11	G7-C13	G7-C14	G7-C15
Long Descrip.	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min
Short Descrip.	COsc Sel	SO2ec	SO2sc	NOXsc	Opacity	Steam Fl
Units *	ppm	ppmc	ppmc	ppmc	%	K#/Hr
Range	0-2000	0-5000	0-2000	0-2500	0-100	0-250
03/07/2008 09:00	7		0	118	0.4	160.5
03/07/2008 09:01	7		0	113	0.4	161.9
03/07/2008 09:02	7	15	0	133	0.4	167.2
03/07/2008 09:03	7	14	0	123	0.4	166.3
03/07/2008 09:04	9	15	0	128	0.4	165.5
03/07/2008 09:05	8	13	0	125	0.4	167.6
03/07/2008 09:06	6	10	0	120	0.4	168.9
03/07/2008 09:07	9	10	0	117	0.4	167.7
03/07/2008 09:08	8	10	0	110	0.4	167.2
03/07/2008 09:09	9	10	0	119	0.4	170.0
03/07/2008 09:10	9	11	0	118	0.4	172.4
03/07/2008 09:11	10	11	0	101	0.4	171.8
03/07/2008 09:12	10	10	0	133	0.4	177.1
03/07/2008 09:13	8	8	0	111	0.4	173.4
03/07/2008 09:14	9	10	0	117	0.4	172.8
03/07/2008 09:15	11	11	0	111	0.4	171.9
03/07/2008 09:16	9	9	0	108	0.5	170.4
03/07/2008 09:17	11	9	0	123	0.5	169.2
03/07/2008 09:18	14	8	0	114	0.4	162.9
03/07/2008 09:19	16	8	0	91	0.4	154.1
03/07/2008 09:20	12	7	0	102	0.4	152.0
03/07/2008 09:21	10	8	0	109	0.4	152.5
03/07/2008 09:22	13	9	0	115	0.4	152.8
03/07/2008 09:23	11	10	0	131	0.4	155.9
03/07/2008 09:24	9	9	0	134	0.4	158.3
03/07/2008 09:25	10	10	0	126	0.4	156.4
03/07/2008 09:26	13	11	0	139	0.4	157.8
03/07/2008 09:27	15	9	0	123	0.5	155.5
03/07/2008 09:28	13	9	0	118	0.4	155.4
03/07/2008 09:29	15	13	0	141	0.5	161.6
03/07/2008 09:30	21	14	0	147	0.4	162.1
03/07/2008 09:31	19	11	0	121	0.4	160.4
03/07/2008 09:32	12	11	0	133	0.4	163.9
03/07/2008 09:33	14	13	0	128	0.4	163.5
03/07/2008 09:34	16	13	0	123	0.4	164.7
03/07/2008 09:35	16	17	0	131	0.4	170.4
03/07/2008 09:36	15	13	0	133	0.4	171.7
03/07/2008 09:37	17	12	0	126	0.4	167.3
03/07/2008 09:38	18	11	0	118	0.4	164.0
03/07/2008 09:39	15	13	0	120	0.4	167.4

Group#-Channel#	G7-C9	G7-C10	G7-C11	G7-C13	G7-C14	G7-C15
Long Descrip.	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min
Short Descrip.	COsc Sel	SO2ec	SO2sc	NOXsc	Opacity	Steam Fl
Units	ppm	ppmc	ppmc	ppmc	%	K#/Hr
Range	0-2000	0-5000	0-2000	0-2500	0-100	0-250
03/07/2008 09:40	14	15	0	141	0.4	169.1
03/07/2008 09:41	18	15	0	124	0.4	163.5
03/07/2008 09:42	17	15	0	119	0.4	160.0
03/07/2008 09:43	13	14	0	125	0.4	160.0
03/07/2008 09:44	11	13	0	129	0.4	158.8
03/07/2008 09:45	14	14	0	126	0.4	156.9
03/07/2008 09:46	13	14	0	135	0.4	159.1
03/07/2008 09:47	10	15	0	137	0.4	162.5
03/07/2008 09:48	10	16	0	142	0.4	164.9
03/07/2008 09:49	12	16	0	126	0.4	165.3
03/07/2008 09:50	11	17	0	141	0.4	169.0
03/07/2008 09:51	9	15	0	124	0.4	164.0
03/07/2008 09:52	13	14	0	128	0.4	160.8
03/07/2008 09:53	19	16	0	124	0.4	160.2
03/07/2008 09:54	18	20	0	132	0.4	167.8
03/07/2008 09:55	14	21	0	142	0.4	173.8
03/07/2008 09:56	19	23	0	138	0.4	176.6
03/07/2008 09:57	23	26	0	126	0.4	177.9
03/07/2008 09:58	23	30	0	130	0.4	181.0
03/07/2008 09:59	18		0	136	0.4	180.3
03/07/2008 10:00	27		0	105	0.4	174.0
03/07/2008 10:01	34		0	93	0.4	162.9
03/07/2008 10:02	26	22	0	91	0.5	157.9
03/07/2008 10:03	24	23	0	97	0.5	155.5
03/07/2008 10:04	31	27	0	114	0.4	156.6
03/07/2008 10:05	28	32	0	117	0.4	161.5
03/07/2008 10:06	20	32	0	136	0.4	168.8
03/07/2008 10:07	22	33	0	133	0.4	169.8
03/07/2008 10:08	23	32	0	134	0.4	167.2
03/07/2008 10:09	25	34	0	134	0.4	165.8
03/07/2008 10:10	24	35	0	128	0.4	162.9
03/07/2008 10:11	29	38	0	136	0.4	162.5
03/07/2008 10:12	39	37	0	125	0.4	162.1
03/07/2008 10:13	31	34	0	141	0.5	167.4
03/07/2008 10:14	23	29	0	126	0.4	164.0
03/07/2008 10:15	31	27	0	110	0.4	159.3
03/07/2008 10:16	33	24	0	102	0.4	155.9
03/07/2008 10:17	32	27	0	103	0.4	157.1
03/07/2008 10:18	25	28	0	108	0.4	160.7
03/07/2008 10:19	26	32	0	126	0.4	167.6
03/07/2008 10:20	26	30	0	133	0.4	172.3
03/07/2008 10:21	22	28	0	132	0.4	174.2
03/07/2008 10:22	72	29	0	116	0.4	175.2
03/07/2008 10:23	109	30	0	94	0.4	179.2
03/07/2008 10:24	30	26	0	100	0.4	180.3
03/07/2008 10:25	23	24	0	105	0.5	179.9
03/07/2008 10:26	20	25	0	112	0.4	179.8
03/07/2008 10:27	21	25	0	107	0.4	175.1
03/07/2008 10:28	28	26	0	108	0.4	174.9
03/07/2008 10:29	25	27	0	99	0.4	172.3
03/07/2008 10:30	28	29	0	114	0.4	170.7

Group#-Channel#	G7-C9	G7-C10	G7-C11	G7-C13	G7-C14	G7-C15
Long Descrip.	U-3 lMin	U-3 lMin	U-3 lMin	U-3 lMin	U-3 lMin	U-3 lMin
Short Descrip.	COsc Sel	SO2ec	SO2sc	NOXsc	Opacity	Steam Fl
Units	ppm	ppmc	ppmc	ppmc	%	K#/Hr
Range	0-2000	0-5000	0-2000	0-2500	0-100	0-250
03/07/2008 10:31	28	28	0	109	0.4	168.0
03/07/2008 10:32	24	27	0	112	0.4	165.3
03/07/2008 10:33	24	28	0	114	0.4	164.8
03/07/2008 10:34	21	26	0	123	0.4	163.7
03/07/2008 10:35	28	27	0	114	0.4	160.1
03/07/2008 10:36	27	33	0	120	0.4	161.0
03/07/2008 10:37	25	42	0	112	0.4	165.8
03/07/2008 10:38	21	35	0	127	0.4	168.2
03/07/2008 10:39	20	32	0	112	0.4	160.6
03/07/2008 10:40	26	32	0	90	0.4	153.0
03/07/2008 10:41	32	36	0	104	0.4	153.5
03/07/2008 10:42	33	39	0	115	0.4	159.2
03/07/2008 10:43	25	39	0	124	0.4	164.9
03/07/2008 10:44	24	40	0	128	0.4	168.5
03/07/2008 10:45	19	37	0	117	0.4	162.7
03/07/2008 10:46	22	37	0	105	0.4	159.7
03/07/2008 10:47	22	37	0	117	0.4	161.4
03/07/2008 10:48	19	38	0	143	0.4	168.3
03/07/2008 10:49	14	40	0	145	0.4	172.6
03/07/2008 10:50	14	37	0	137	0.4	172.9
03/07/2008 10:51	17	37	0	109	0.4	165.5
03/07/2008 10:52	17	48	0	117	0.4	165.5
03/07/2008 10:53	16	44	0	135	0.4	166.9
03/07/2008 10:54	18	45	0	133	0.4	169.2
03/07/2008 10:55	18	44	0	137	0.4	169.8
03/07/2008 10:56	19	44	0	129	0.4	169.2
03/07/2008 10:57	21	43	0	129	0.4	167.0
03/07/2008 10:58	21	42	0	127	0.4	161.9
03/07/2008 10:59	19		0	123	0.4	163.6
03/07/2008 11:00	14		0	140	0.4	166.9
Period Average =	20	23	0	122	0.4	165.6
Period Max Value =	109	48	0	147	0.5	181.0
Period Min Value =	6	7	0	90	0.4	152.0
Period Totals =	2.3720E+3	2.6260E+3	0.0000E+0	1.4702E+4	4.9200E+1	2.0037E+4
Period % Recovery =	100.0	95.0	100.0	100.0	100.0	100.0

- ① CO AT STACK
- ② SO2 AT BOILER ECONOMIZER OUTLET (BEFORE SCRUBBER)
- ③ SO2 AT STACK
- ④ NOx AT STACK
- ⑤ OPACITY AT STACK
- ⑥ BOILER STEAM GENERATION
- * ALL CONCENTRATIONS (PPM) CORRECTED TO 7% O2 EQUIVALENT

Daily Calibration Summary

COVANTA

COVANTA
Environmental Services
 Division of Covanta, Inc.

Company: Covanta Lee, Inc.
 10500 Buchingham Road
 Fort Myers, FL

Stack ID #: UNIT #3
 Start of Report: 03/07/08 00:00
 End of Report: 03/07/08 23:59

TYPE	PARAMETER	START	STOP	EXPECT.	ACTUAL	ERROR	% FS	STATUS
Zero	COSH 3	03/07/08 06:48	03/07/08 06:53	0.00	1.00	1.00	0.0	OK
Span		03/07/08 06:53	03/07/08 06:58	1094.0	1072.0	-22.00	-1.1	
Zero	COSL 3	03/07/08 06:48	03/07/08 06:53	0.00	0.00	0.00	0.0	OK
Span		03/07/08 06:58	03/07/08 07:03	275.00	279.30	4.30	0.8	
Zero	NH3S 3	03/07/08 06:48	03/07/08 06:53	0.00	0.00	0.00	0.0	OK
Span		03/07/08 07:03	03/07/08 07:12	55.30	62.32	7.02	3.5	
Zero	NOXS 3	03/07/08 06:48	03/07/08 06:53	0.00	-0.30	-0.30	-0.0	OK
Span		03/07/08 06:53	03/07/08 06:58	269.00	268.30	-0.70	-0.1	
Zero	O2E 3	03/07/08 06:35	03/07/08 06:40	0.00	0.10	0.10	0.4	OK
Span		03/07/08 06:45	03/07/08 06:50	13.00	12.90	-0.10	-0.4	
Zero	O2S 3	03/07/08 06:48	03/07/08 06:53	0.00	-0.10	-0.10	-0.4	OK
Span		03/07/08 06:58	03/07/08 07:03	13.00	12.80	-0.20	-0.8	
Zero	OPS 3	03/07/08 07:01	03/07/08 07:02	0.00	0.00	0.00	0.0	OK
Span		03/07/08 07:04	03/07/08 07:05	45.50	45.60	0.10	0.1	
Zero	SO2E 3	03/07/08 06:35	03/07/08 06:40	0.00	-0.20	-0.20	-0.0	OK
Span		03/07/08 06:40	03/07/08 06:45	560.00	539.10	-20.90	-2.0	
Zero	SO2S 3	03/07/08 06:48	03/07/08 06:53	0.00	-1.00	-1.00	-0.2	OK
Span		03/07/08 06:53	03/07/08 06:58	276.00	267.00	-9.00	-2.2	