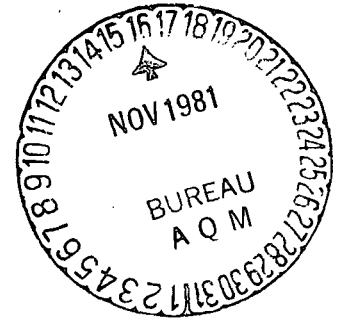


FINAL DETERMINATION  
Reedy Creek Improvement District  
PSD-FL-044



I. Applicant

Reedy Creek Improvement District  
Post Office Box 36  
Lake Buena Vista, Florida 32830

II. Location

The proposed source is located on North Center Road in the city of Lake Buena Vista, Orange County, Florida. The UTM coordinates are 442.0 east and 3144.2 north.

III. Project Description

The applicant proposes to build a slagging pyrolysis incinerator at its plant in Lake Buena Vista, Florida. The pyrolysis incinerator facility will be capable of reducing 100 tons per day (8333 lb/hr) of municipal solid waste. The waste passes through three process zones including: the drying zone, where the water content is evaporated; the pyrolysis zone, where the material is heated by the rising hot gases; and the combustion zone, where the coal content of the waste is oxidized to carbon monoxide and carbon dioxide, and the slag is granulated in a water bath.

The incinerator will serve as a pilot plant for the proposed nuclear waste slagging facility at the Idaho National Engineering Laboratory (INEL). During its first year of operation, plus up to 30 days per year during the first 10 years of operation, the incinerator will be devoted to testing as a pilot plant with a waste input as listed on Table 1. The waste is free of any significant levels of radioactivity. After the initial test period, 50 percent of the waste consumed by the facility will come from the Walt Disney World resort complex and 50 percent will be Orange County residential waste. The incinerator will generate high-temperature hot water from the off-gas and will supply approximately 15 percent of the hot water needs of the Walt Disney World resort complex. The proposed unit will release nitrogen oxides ( $\text{NO}_x$ ), carbon monoxide (CO), sulfur dioxide ( $\text{SO}_2$ ), volatile organic compounds (VOC), and particulate matter (PM) into the atmosphere.

#### IV. Source Impact Analysis

Prevention of Significant Deterioration (PSD) of air quality review is required for a new municipal waste incinerator capable of processing less than 250 tons of refuse per day which increases potential emissions by 250 or more tons per year of any pollutant regulated under the Clean Air Act, consistent with the provisions of 40 CFR 52.21 promulgated June 19, 1978, and amended on August 7, 1980. Table 2 shows the potential emissions increases from the proposed incinerator. The proposed source has potential emissions of carbon monoxide which exceed 250 tons per year. The new slagging pyrolysis incinerator will result in significant net increases in both particulate matter and CO. Therefore, the pollutants included in this PSD review are PM and CO. The review consists of the following:

- A. A Best Available Control Technology (BACT) Analysis;
- B. An Existing Air Quality Analysis;
- C. A National Ambient Air Quality Standards (NAAQS) Analysis;
- D. An Increment Impact Analysis;
- E. A Soils, Vegetation, and Visibility Impact Analysis;
- F. A Growth Impact Analysis; and
- G. A Class I Area Impact Analysis.

The PSD application for Reedy Creek Improvement District was found to be complete prior to August 7, 1980.

The area is considered attainment or unclassifiable for all pollutants with the exception of ozone. Therefore, emissions of volatile organic compounds (VOC) are not subject to PSD review consistent with 40 CFR 52.21 i(3).

##### A. Best Available Control Technology (BACT)

Paragraph (i)(9) of the August 7, 1980, PSD regulations exempts this source from the BACT requirement of paragraph (j) of the 1980 regulations. Instead, the BACT requirements of paragraph (j) of the June 19, 1978, regulations apply. Therefore, a BACT review for CO is required because allowable emissions exceed 50 tons per year. BACT review for PM emissions is not required, because emissions, after application of control technology, does not exceed 50 tons per year.

Carbon monoxide emissions are the product of incomplete combustion of fuel. Turbulence, high temperature, and long periods in the combustion zone influence the amount of CO emissions. Proper combustion control will minimize the formation of CO. The applicant proposes to use combustion controls to guarantee a maximum CO emission rate of 2.26 lb/MMBtu (91.2 lb/hr). This quantity translates to roughly 22 lb CO/ton waste burned which compares favorably with the AP-42 factor for municipal incinerators of 35 lb CO/ton waste (AP-42 Table 2.1-1). Control of CO emissions will be accomplished by a flue gas oxygen monitoring system to control the air/fuel ratio in accordance with the attached "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls." The flue gas oxygen meter will be correlated with CO concentrations during the initial compliance testing required for this source. EPA accepts the proposed emissions rate and the described technology as BACT for CO.

The New Source Performance Standard (NSPS) for incinerators promulgated June 11, 1979, stipulates particulate emissions be no greater than 0.08 gr/dscf corrected to 12 percent carbon dioxide (CO<sub>2</sub>) for units reducing more than 50 tons of solid waste per day. The applicant proposes to install an electrostatic precipitator (ESP) with a removal efficiency of 94.7 percent which is designed and guaranteed to meet the NSPS of 0.08 gr/dscf, corrected to 12 percent CO<sub>2</sub>. The proposed allowable emissions rate for PM is less than the NSPS level. Fly ash from the ESP will be returned to the slagging pyrolysis incinerator and mixed with the bottom ash. The bottom ash and flyash is then quenched and landfilled on-site. No significant PM emissions are expected to occur from this activity.

#### B. Existing Air Quality

Paragraph (i)(9) of the PSD regulations exempts this source from the monitoring requirements of paragraph (m)(1) of the regulations since a complete application for a permit was submitted before August 7, 1980. Instead, the monitoring requirements of paragraph (n) of the regulations as published in the June 19, 1978, Federal Register apply. Therefore, the source must provide pre-construction monitoring data for CO as deemed necessary by the Administrator because allowable emissions of this pollutant exceed 50 tons per year.

The area is rural and has no significant industrial development which would contribute to the air quality. Because the area has been classified attainment for CO, and because the specific impact on air quality from the proposed source is insignificant, no site-specific monitoring was necessary. Therefore, rural background levels consistent with those recommended in the PSD Ambient Monitoring Guideline (EPA 450/2-78-019) were assumed to represent existing air quality.

C. National Ambient Air Quality Standards (NAAQS) Analysis

An NAAQS analysis is required for both PM and CO, because the proposed source will have a significant net increase in emissions of these pollutants.

The maximum impacts (highest and second highest concentrations) were estimated using the EPA-approved single source (CRSTER) model. Surface and upper air (mixing height) data for 5 consecutive years from 1966 to 1970 were obtained from Orlando, Florida. This was an airport site located 25 kilometers northeast of the project site.

All stacks were modeled at Good Engineering Practice (GEP) stack height or actual height, whichever was lower. No adverse effects due to turbulent building wake effects (downwash) were predicted.

An area of significant impact is defined as the radial distance from the source beyond which the projected ambient air concentrations for a particular pollutant fall below the significance levels as defined in the June 19, 1978, PSD regulations, 43FR26398. The projected ambient air concentrations of each pollutant were found to be below their respective significance levels.

No further analysis of the CO and PM total concentrations was necessary since these pollutants do not have areas of significant impact. The modeling results are shown in Table 3.

D. Increment Analysis

The models and meteorology for determination of PM increment consumption were the same as those discussed above.

This area is relatively undeveloped industrially, and no increment consuming sources were identified. Projected ground-level PM concentrations

are below the allowable increments for all appropriate averaging times. No further analysis of PM increment consumption was necessary since PM does not have a significant impact area. The results are shown in Table 3.

E. Soils, Vegetation, and Visibility Impact

Significant impact of the proposed unit upon the soils, vegetation, and visibility of the area is not expected. Ambient air quality standards are set to protect the health and welfare of the general public. Furthermore, the proposed unit does not emit greater than 100 tons per year of PM, which can influence visibility. For these reasons, no significant adverse impact on soils, vegetation, or visibility is anticipated.

F. Growth Impacts

No acute air pollution effects are expected from growth associated with the construction and operation of the proposed incinerator.

G. Class I Areas Impact

The nearest Class I area is the Chassahowitzka Wilderness Area, greater than 100 kilometers distant. No impacts are expected at this or any other Class I area.

V. Conclusions

EPA Region IV proposes a final determination of approval with conditions for Reedy Creek Improvement District to construct the proposed source located in Lake Buena Vista, Orange County, Florida. This approval is based on the information provided in their application dated January 9, 1980. The conditions set forth in the permit are as follows:

1. The permittee is authorized to construct and operate in conformity with the specifications submitted to EPA and analyzed in EPA's document entitled "Preliminary Determination" dated November 25, 1980, and subject to the following emission limitations and other conditions specified. The specifications submitted to EPA are the application submitted January 9, 1980, (and additional information dated July 30, 1980). Where two emission limits with different bases are

- given for a single emission point and pollutant, the source shall not exceed either limit at any time. Allowable emissions rates for the proposed modification are shown in Table 4.
2. Compliance with the emission limitations of Condition 1 shall be determined by the test methods and procedures as set forth in 40 CFR Part 60, Appendix A, Method 5, Determination of Particulate Matter Emissions from Stationary Sources; Method 6, Determination of Sulfur Dioxide Emissions from Stationary Sources; Method 7, Determination of Nitrogen Oxide Emissions from Stationary Sources; Method 9, Visual Determination of the Opacity of Emissions from Stationary Sources; and Method 10, Determination of Carbon Monoxide Emissions from Stationary Sources.
  3. The permittee shall install a flue gas oxygen monitor in the incinerator stack to continuously monitor a representative sample of the flue gas and shall comply with the procedures as specified in the attached "Use of Flue Gas Oxygen Meter as BACT for Combustion Controls". The monitored oxygen concentrations will be correlated with CO concentrations measured during the compliance testing as stipulated in Specific Condition 2 to continuously regulate the CO emissions. The flue gas oxygen content shall be maintained in the range determined by the compliance testing. Any operation outside this range shall constitute non-complying emissions. The oxygen monitor shall be used with automatic feedback or manual controls to continuously maintain the air/fuel ratio demonstrated to comply with the CO allowable emissions limit. The oxygen content shall be checked and adjusted hourly to ensure compliance. Records of testing and adjustments to ensure compliance shall be maintained.
  4. Emission point (a) of Condition 1 is limited to a municipal waste firing of 8333 pounds per hour. Daily records of the firing rate will be recorded and made available for public inspection.
  5. The permittee is authorized to operate 24 hours per day, 7 days per week, 52 weeks per year.
  6. The applicant will comply with the requirements and provisions of the attached General Conditions.

Table 1  
Typical Idaho National  
Engineering Laboratory Waste

	<u>Tons/Year</u>	<u>Percent of Total</u>
Coal	2,025	16
Wood Chips	4,038	32
Municipal Waste	1,639	13
Soil	2,279	18
Concrete	2,278	18
Iron	<u>370</u>	<u>3</u>
	12,629	100

Table 2  
Potential Emissions from the Proposed Unit

<u>Pollutant</u>	<u>Potential Emissions<sup>a</sup></u> (tons/year)	<u>PSD Significance Levels</u> (tons/year)
Carbon Monoxide <sup>b</sup>	399.4	100
Nitrogen Oxides <sup>c</sup>	35.9	40
Sulfur Dioxide <sup>c</sup>	33.7	40
Particulate Matter <sup>c</sup>	29.4	25
Volatile Organic Compounds <sup>b,d</sup>	1.4	40

<sup>a</sup>Potential emissions estimates are based on maximum capacity, continuous operation.

<sup>b</sup>Based on an investigation at the Andco-Torrax pyrolysis plant in Grasse, France. The emissions rate is based on percent CO and flow rate stack test data for the incinerator operating at 2.6 tons/hr waste input. Since the proposed unit operates at a maximum of 4.2 tons/hr the emissions rate is conservative.

<sup>c</sup>Based on data assembled using Andco Incorporated's historical information on the pilot plant at Orchard Park, New York, predicted pollutant emissions for the SWEC plant and actual test information on a plant in Grasse, France.

<sup>d</sup>This is a non-attainment area for ozone. Therefore, PSD review does not apply consistent with 40 CFR 52.21(i)(3).



Table 3  
Comparison of Predicted  
Ground-Level Concentrations

<u>Pollutant Averaging Time</u>	<u>Contribution From* The Proposed New Source</u> ug/m <sup>3</sup>	<u>PSD Modeling Significance Level</u>	<u>Class # Increment Standards</u>	<u>NAAQS</u>
CO				
8-hour	42.9	500	--	10,000
1-hour	77.6	2000	--	40,000
PM				
Annual	0.07	1	19	75
24-hour	0.91	5	37	150

\* Ambient air quality impacts due to emissions from the proposed new source are insignificant. Therefore, no further modeling is warranted.

Table 4  
Maximum Allowable Mass Emission Rates

<u>Emission Point</u>	<u>Firing Rate</u>	<u>Fuel Type</u>	<u>PM</u>	<u>Allowable Emissions</u>			<u>Opacity</u>
				<u>CO</u>	<u>SO<sub>2</sub></u> <sup>*</sup>	<u>NO<sub>x</sub></u> <sup>*</sup>	
(a) Municipal Waste Incinerator	6.0 and 38.7 MMBtu/hr of Natural Gas and waste respectively (100 tons/day waste)	Municipal Waste/ Natural Gas	6.7 lb/hr	91.2 lb/hr	7.7 lb/hr	8.2 lb/hr	10%
			0.17 lb/MMBtu	2.26 lb/MMBtu	0.19 lb/MMBtu	0.20 lb/MMBtu	

\*To insure that SO<sub>2</sub> and NO<sub>x</sub> emissions do not exceed PSD significance levels, compliance testing shall be performed for both SO<sub>2</sub> and NO<sub>x</sub>.

USE OF FLUE GAS OXYGEN METER AS BACT FOR  
COMBUSTION CONTROLS

Within the time limits specified in General Condition 3 of this permit, the permittee shall determine the emissions of nitrogen oxides and carbon monoxide from the permitted combustion device in accordance with test methods and procedures set out in 40 CFR Part 60, Appendix A, Methods 7 and 10, respectively. These emission determinations shall be made at:

- 1) Maximum design capacity; and
- 2) Normal operational load.

The permittee shall install a continuous oxygen monitor in the flue of the permitted combustion device which meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3. Results of emission determinations shall be correlated to the flue gas oxygen content to define:

- 1) The point at which Nitrogen Oxides ( $\text{NO}_x$ ) emissions (lb/MMBtu) equals the allowable  $\text{NO}_x$  emission rate contained in the permit.
- 2) The point at which carbon monoxide (CO) emissions exceed the allowable CO emission rate contained in the permit.

The flue gas oxygen content shall be maintained between these points and alarms shall be set to sound when flue gas oxygen levels exceed either side of this range. Any operation outside of this range will constitute noncompliance with this specific condition, shall be recorded in accordance with General Condition 4 of this permit, and will be reported quarterly along with excess emissions in accordance with 40 CFR 60.7 (c).

Should any combustion equipment modifications be made such as different type burners, combustion air relocation, fuel conversion, tube removal or addition, etc., emissions correlations as described above shall be conducted within 90 days of attaining full operation after such modification. Results of all emission determinations shall be sent to the permitting authority within 90 days after completion of the tests.

# Best Available Copy

## GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such ~~action and the estimated date of demonstration of compliance as~~ required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within five (5) days of such conditions:
  - (a) description of noncomplying emission(s),
  - (b) cause of noncompliance,
  - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
  - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission,and
  - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
8. The permittee shall allow representatives of the State environmental control agency and/or representatives of the Environmental Protection Agency, upon the presentation of credentials:
  - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
  - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
  - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
  - (d) to sample at reasonable times any emission of pollutants;and
  - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
9. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to the:

Chief, Air Facilities Branch  
Air and Hazardous Materials Division  
U.S. Environmental Protection Agency  
Region IV  
345 Courtland Street  
Atlanta, Georgia 30365
10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit shall constitute a violation of the terms and conditions of this permit.

PRELIMINARY DETERMINATION  
Reedy Creek Improvement District  
PSD-FL-044

I. Applicant

Reedy Creek Improvement District  
Post Office Box 36  
Lake Buena Vista, Florida 32830

II. Location

The proposed source is located on North Center Road in the city of Lake Buena Vista, Orange County, Florida. The UTM coordinates are 442.0 east and 3144.2 north.

III. Project Description

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The incinerator will serve as a pilot plant for the proposed nuclear waste slagging facility at the Idaho National Engineering Laboratory (INEL). During its first year of operation, plus up to 30 days per year during the first 10 years of operation, the incinerator will be devoted to testing as a pilot plant with a waste input as listed on Table 1. The waste is free of any significant levels of radioactivity. After the initial test period, 50 percent of the waste consumed by the facility will come from the Walt Disney World resort complex and 50 percent will be Orange County residential waste. The incinerator will generate high-temperature hot water from the off-gas and will supply approximately 15 percent of the hot water needs of the Walt Disney World resort complex. The proposed unit will release nitrogen oxides ( $\text{NO}_x$ ), carbon monoxide (CO), sulfur dioxide ( $\text{SO}_2$ ), volatile organic compounds (VOC), and particulate matter (PM) into the atmosphere.

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- G. A Class I Area Impact Analysis.

The PSD application for Reedy Creek Improvement District was found to be complete prior to August 7, 1980.

The area is considered attainment or unclassifiable for all pollutants with the exception of ozone. Therefore, emissions of volatile organic compounds (VOC) are not subject to PSD review consistent with 40 CFR 52.21 i(3).

##### A. Best Available Control Technology (BACT)

Paragraph (i)(9) of the August 7, 1980, PSD regulations exempts this source from the BACT requirement of paragraph (j) of the 1980 regulations. Instead, the BACT requirements of paragraph (j) of the June 19, 1978, regulations apply. Therefore, a BACT review for CO is required because allowable emissions exceed 50 tons per year. BACT review for PM emissions is not required, because emissions, after application of control technology, does not exceed 50 tons per year.

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The area is rural and has no significant industrial development which would contribute to the air quality. Because the area has been classified attainment for CO, and because the specific impact on air quality from the proposed source is insignificant, no site-specific monitoring was necessary. Therefore, rural background levels consistent with those recommended in the PSD Ambient Monitoring Guideline (EPA 450/2-78-019) were assumed to represent existing air quality.

#### C. National Ambient Air Quality Standards (NAAQS) Analysis

An NAAQS analysis is required for both PM and CO, because the proposed source will have a significant net increase in emissions of these pollutants.

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<sup>d</sup>This is a non-attainment area for ozone. Therefore, PSD review does not apply consistent with 40 CFR 52.21(i)(3).

Table 3  
Comparison of Predicted  
Ground-Level Concentrations

<u>Pollutant Averaging Time</u>	<u>Contribution From* The Proposed New Source</u>  ug/m <sup>3</sup>	<u>PSD Modeling Significance Level</u>	<u>Class # Increment Standards</u>	<u>NAAQS</u>
CO				
8-hour	42.9	500	--	10,000
1-hour	77.6	2000	--	40,000
PM				
Annual	0.07	1	19	75
24-hour	0.91	5	37	150

\* Ambient air quality impacts due to emissions from the proposed new source are insignificant. Therefore, no further modeling is warranted.

Table 4  
Maximum Allowable Mass Emission Rates

<u>Emission Point</u>	<u>Firing Rate</u>	<u>Fuel Type</u>	<u>Allowable Emissions</u>				<u>Capacity</u>
			<u>PM</u>	<u>CO</u>	<u>SO<sub>2</sub><sup>*</sup></u>	<u>NO<sub>x</sub><sup>*</sup></u>	
(a) Municipal Waste Incinerator	6.0 and 38.7 MMBtu/hr of Natural Gas and waste respectively (100 tons/day waste)	Municipal Waste/ Natural Gas	6.7 lb/hr	91.2 lb/hr	7.7 lb/hr	8.2 lb/hr	10%
			0.17 lb/MMBtu	2.26 lb/MMBtu	0.19 lb/MMBtu	0.20 lb/MMBtu	

\* To insure that SO<sub>2</sub> and NO<sub>x</sub> emissions do not exceed PSD significance levels, compliance testing shall be performed for both SO<sub>2</sub> and NO<sub>x</sub>.

USE OF FLUE GAS OXYGEN METER AS BACT FOR  
COMBUSTION CONTROLS

Within the time limits specified in General Condition 3 of this permit, the permittee shall determine the emissions of nitrogen oxides and carbon monoxide from the permitted combustion device in accordance with test methods and procedures set out in 40 CFR Part 60, Appendix A, Methods 7 and 10, respectively. These emission determinations shall be made at:

- 1) Maximum design capacity; and
- 2) Normal operational load.

The permittee shall install a continuous oxygen monitor in the flue of the permitted combustion device which meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3. Results of emission determinations shall be correlated to the flue gas oxygen content to define:

- 1) The point at which Nitrogen Oxides ( $\text{NO}_x$ ) emissions (lb/MMBtu) equals the allowable  $\text{NO}_x$  emission rate contained in the permit.
- 2) The point at which carbon monoxide (CO) emissions exceed the allowable CO emission rate contained in the permit.

The flue gas oxygen content shall be maintained between these points and alarms shall be set to sound when flue gas oxygen levels exceed either side of this range. Any operation outside of this range will constitute noncompliance with this specific condition, shall be recorded in accordance with General Condition 4 of this permit, and will be reported quarterly along with excess emissions in accordance with 40 CFR 60.7 (c).

Should any combustion equipment modifications be made such as different type burners, combustion air relocation, fuel conversion, tube removal or addition, etc., emissions correlations as described above shall be conducted within 90 days of attaining full operation after such modification. Results of all emission determinations shall be sent to the permitting authority within 90 days after completion of the tests.



## GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such action and the estimated date of demonstration of compliance as required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within five (5) days of such conditions:
  - (a) description of noncomplying emission(s),
  - (b) cause of noncompliance,
  - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
  - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission,and
  - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
8. The permittee shall allow representatives of the State environmental control agency and/or representatives of the Environmental Protection Agency, upon the presentation of credentials:
  - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
  - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
  - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
  - (d) to sample at reasonable times any emission of pollutants;and
  - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
9. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to the:

Chief, Air Facilities Branch  
Air and Hazardous Materials Division  
U.S. Environmental Protection Agency  
Region IV  
345 Courtland Street  
Atlanta, Georgia 30308
10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit shall constitute a violation of the terms and conditions of this permit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30308

DEC 23 1980

PSD-FL - 0044  
REEDY CREEK  
SLAGGING PYROLYSIS

REF: 4AH-AF

Mr. Steve Smallwood, Chief  
Bureau of Air Quality Management  
Division of Environmental Programs  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

RE: Reedy Creek Improvement District  
PSD-FL-044

Dear Mr. Smallwood:

Enclosed for your review and comment are the Public Notice and Preliminary PSD Determination for the Reedy Creek Improvement District's proposed slagging pyrolysis incinerator in Lake Buena Vista, Florida. The public notice will appear in a local newspaper, Orlando Sentinel Star, in the near future.

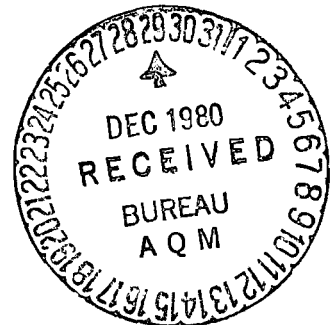
Please let my office know if you have comments or questions regarding this determination. You may contact Mr. Kent Williams, Chief, New Source Review, at 404/881-4552 or Mr. Jeffrey Shumaker of TRW Inc. at 919/541-9100. TRW Inc. is under contract to EPA, and TRW personnel are acting as authorized representatives of the Agency in providing aid to the Region IV PSD review program.

Sincerely yours,

*KWilliams*  
*Jr* Tommie A. Gibbs, Chief  
Air Facilities Branch

TAG:JLS:clu

Enclosure



## PUBLIC NOTICE

A new air pollution source is proposed for construction by the Reedy Creek Improvement District near the town of Lake Buena Vista in Orange County, Florida. The source is a slagging pyrolysis incinerator and will increase emissions of air pollutants by the following amounts in tons per year:

<u>CO</u>	<u>NO<sub>x</sub></u>	<u>SO<sub>2</sub></u>	<u>PM</u>	<u>VOC</u>
399.4	35.9	33.7	29.4	1.4

Allowable increment consumption has not been determined for PM and SO<sub>2</sub> because maximum impacts from these emissions are less than the significance values contained in the Preamble to the 1978 PSD regulation (43 FR 26398).

The proposed construction has been reviewed by the U. S. Environmental Protection Agency (EPA) under Federal Prevention of Significant Deterioration (PSD) Regulations (40 CFR 52.21), and EPA has made a preliminary determination that the construction can be approved provided certain conditions are met. A summary of the basis for this determination and the application for a permit submitted by Reedy Creek Improvement District are available for public review in the office of Ms. Margaret Brackney, Service and Information Office, 55 E. Central Blvd., Orlando, Florida.

Any person may submit written comments to EPA regarding the proposed modification. All comments, postmarked not later than 30 days from the date of this notice, will be considered by EPA in making a final determination regarding approval for construction of this source. These comments will be made available for public review at the above location. Furthermore, a public hearing can be requested by any person. Such requests should be submitted within 15 days of the date of this notice. Letters should be addressed to:

Mr. Tommie A. Gibbs, Chief  
Air Facilities Branch  
U. S. Environmental Protection Agency  
345 Courtland Street, NE  
Atlanta, Georgia 30365

Best Available Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
343 COURTLAND STREET  
ATLANTA, GEORGIA 30365

RECEIVED

FEB 16 1981

FEB 11 1981

DEPT. OF  
ENVIRONMENTAL REGULATION

REF: 4AH-AF

Mr. H. Robert Kohl, P.E.  
Manager, Waste and Water  
Reedy Creek Utilities Co., Inc.  
P. O. Box 40  
Lake Buena Vista, Florida 32830

Re: Slagging Pyrolysis Incinerator  
PSD-FL-044

Dear Mr. Kohl:

Review of your January 9, 1980 application to construct a slagging pyrolysis incinerator has been completed. The construction is subject to rules for the Prevention of Significant Air Quality Deterioration (PSD), contained in 40 CFR §52.21.

We have determined that the construction, as described in the application, meets all applicable requirements of the PSD regulations, subject to the conditions in the Conclusions section to the Final Determination (enclosed). EPA has performed the preliminary determination concerning the proposed construction, and published a request for public comment on December 31, 1980. No comments were received. Authority to Construct a Stationary Source is hereby issued for the facility described above, subject to the conditions in the Conclusions section to the Final Determination. This Authority to Construct is based solely on the requirements of 40 CFR §52.21, the Federal regulations governing significant deterioration of air quality. It does not apply to NPDES or other permits issued by this Agency or permits issued by other agencies. Information regarding EPA permitting requirements can be provided if you contact Mr. Joe Franzmathes, Director, Office of Program Integration and Operations, at 404/881-3476. Additionally, construction covered by this Authority to Construct must be initiated within 18 months from the date of this letter.

Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.



Authority to Construct will take effect on the date of this letter. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Mr. Kent Williams, Chief, New Source Review Section.

Sincerely yours,

Thomas W. Devine  
Director  
Air and Hazardous Materials Division

TWD:JLS:clu

Enclosure

✓ cc: S. Smallwood  
Florida Department of Environmental Regulation