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DIVISION OF AIR
RESOURCE MANAGEMENT

**TITLE V AIR OPERATION PERMIT
REVISION**

Palm Beach Renewable Energy Park

Project 0990234 -031-AL

Prepared For: Solid Waste Authority of Palm Beach County
7501 North Jog Road
West Palm Beach, FL 33412

Submitted By: Golder Associates Inc.
6026 NW 1st Place
Gainesville, FL 32607 USA

Module
AB 223

Distribution: FDEP – 4 copies
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October 2013

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Permit Application

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DIVISION OF AIR
RESOURCE MANAGEMENT

Jeff Koerner
Administrator
Office of Permitting and Compliance
Florida Department Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Project 0990234-031-AV

**RE: Title V Air Operation Permit 0990234-022-AV - Revision Application
Biosolids Pelletization Facility Scrubber/Cyclone Project (EU010 & EU011)
Replacement Emergency Generator PBREF Scalehouse (EU037)
Palm Beach Renewable Energy Park (formerly known as NCRRF)**

Dear Jeff:

Please find attached four (4) copies of the Title V Air Operation Permit Revision application for the Palm Beach Renewable Energy Park (PBREP) (facility ID 0990234, formerly known as NCRRF) owned by the Solid Waste Authority of Palm Beach County (SWAPBC) and located at 7501 North Jog Road in West Palm Beach, FL to incorporate the following:

- Air Project No. 0990234-026-AC – Physical change to Tray Scrubbers and Cyclonic separators at the Biosolids Pelletizing Facility (BPF) (project was exempt from requiring AC permit) for Dyer Trains 1 & 2 (EU010, EU011). Submit revised CAM plan for Venturi Scrubbers.
- Air Project No. 0990234-027-AC – Testing authorization for establishment of CAM parameters for the Venturi Scrubbers as part of the modified Tray Scrubbers and Cyclonic Separators at the BPF (project was exempt from requiring AC permit).
- Air Construction Permit No. 0990234-029-AC – New emergency generator/stationary diesel engine to replace existing emergency generator/stationary diesel engine (EU ID 037) at the Scalehouse that serves the Waste-to-Energy Facility.
- Change the Site name from North County Resource Recovery Facility (NCRRF) to Palm Beach Renewable Energy Park (PBREP).

The facility is currently operating under Title V air operation permit No. 0990234-022-AV. Physical changes to the tray scrubbers and cyclonic separators at the BPF were authorized under Air Project No. 0990234-026-AC which also required PM/PM10 stack testing to establish CAM parameters for the Venturi Scrubbers. The stack testing has been completed, and the Title V revision application, which includes a revised CAM plan, is due on November 5, 2013. Please note that the replacement emergency generator/stationary diesel engine authorized under permit No. 0990234-029-AC has been purchased and delivery is expected by the end of November 2013. A compliance plan for the emergency generator set is included with the application to notify the Department after the installation and readiness testing is complete.

If you have any questions or need additional information please contact Mary Beth Morrison at (561) 640-4000 extension 4613.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Hammond", with a long horizontal flourish extending to the right.

Mark Hammond
Executive Director
Solid Waste Authority of Palm Beach County

Enclosures

cc: Marc Bruner, SWA
Mark McLean, SWA
Mary Beth Morrison, SWA
Sal Mohammad, Golder Associates
Ken Kosky, Golder Associates
Cynthia Hibbard, CDM Smith

APPLICATION FOR AIR PERMIT – LONG FORM



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

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 DIVISION OF AIR
 RESOURCE MANAGEMENT

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Solid Waste Authority of Palm Beach County	
2. Site Name: Palm Beach Renewable Energy Park	
3. Facility Identification Number: 0990234	
4. Facility Location... Street Address or Other Locator: 7501 North Jog Road City: West Palm Beach County: Palm Beach Zip Code: 33412	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Facility Contact Name: Mary Beth Morrison, Environmental Programs Manager
2. Facility Contact Mailing Address... Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: Palm Beach Zip Code: 33412
3. Facility Contact Telephone Numbers: Telephone: (561) 640-4000 ext. 4613 Fax: (561) 640- 3400
4. Facility Contact E-mail Address: mmorrison@swa.org

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Permit application to revise the current Title V air operating permit No. 0990234-022-AV to incorporate the following air projects:

- 1. Project No. 0990234-026-AC - Physical change to Tray Scrubbers and Cyclonic separators at the Biosolids Pelletizing Facility (BPF) (physical change was exempt from requiring AC permit).**
- 2. Project No. 0990234-027-AC - Testing authorization for establishment of CAM parameters for the modified Tray Scrubbers and Cyclonic Separators at the BPF (project was exempt from requiring AC permit).**
- 3. Air Construction Permit No. 0990234-029-AC - New emergency generator/stationary diesel engine to replace existing emergency generator/stationary diesel engine (EU ID 037) at the Scalehouse.**

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
010	Sludge Dryer Train No. 1	AF2A	N/A
011	Sludge Dryer Train No. 2	AF2A	N/A
037	Emergency Generator/Diesel Engine - NCRRF Scalehouse	AF2C	N/A

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement


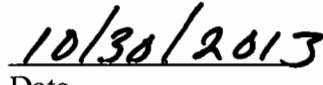
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () ext. Fax: ()
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature _____ Date

APPLICATION INFORMATION

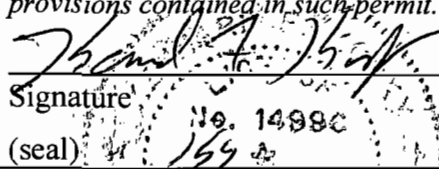
Application Responsible Official Certification

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

1. Application Responsible Official Name: Mark Hammond, Executive Director
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412
4. Application Responsible Official Telephone Numbers... Telephone: (561) 640 - 4000 ext. Fax: (561) 640 - 3400
5. Application Responsible Official E-mail Address: mhammond@swa.org
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.  Signature  Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Kennard F. Kosky Registration Number: 14996
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6026 NW 1st Place City: Gainesville State: FL Zip Code: 32607
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 21156 Fax: (352) 336-6603
4. Professional Engineer E-mail Address: Ken_Kosky@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature: <u><i>Kennard F. Kosky</i></u> Date: <u>10/25/13</u> (seal) 

* Attach any exception to certification statement.

**Board of Professional Engineers Certificate of Authorization #00001670.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 585.82 North (km) 2960.474		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 26/45/53 Longitude (DD/MM/SS) 80/08/12	
3. Governmental Facility Code: 3	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4953
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Mary Beth Morrison, Environmental Programs Manager
2. Facility Contact Mailing Address... Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412
3. Facility Contact Telephone Numbers: Telephone: (561) 640-4000 ext. 4613 Fax: (561) 640-3400
4. Facility Contact E-mail Address: mmorrison@swa.org

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () ext. Fax: ()
4. Facility Primary Responsible Official E-mail Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: Applicability of the facility emissions units to various federal regulations are available in the current Title V permit No. 0990234-022-AV. BPF Sludge Dryer Train Nos. 1 and 2 (EUs 010 and 011) are subject to 40 CFR 64, Compliance Assurance Monitoring requirements. The new emergency generator for the Scalehouse (EU 037) is subject to the NSPS provisions under 40 CFR 60 Subpart IIII for Stationary Compression Ignition Internal Combustion Engines.	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
NOx	A	N
CO	A	N
SO2	A	N
H106	A	N
VOC	B	N
PM	A	N
PM10	A	N
PB	B	N
D/F	B	N
H114	B	N
H027	B	N
NH3	B	N

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>5/10/2010</u>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>5/10/2010</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>5/10/2010</u>

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4. List of Exempt Emissions Units: Diesel storage tank, aqueous ammonia (19%) or urea storage tank, and ash handling system (based on 62-210.300(3)(b)1., F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable (revision application)
2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
 Attached, Document ID: _____
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
 Attached, Document ID: **SWA-FI-CV3**
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____
 Equipment/Activities Onsite but Not Required to be Individually Listed
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: _____ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

<p>1. Acid Rain Program Forms:</p> <p>Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p> <p><input checked="" type="checkbox"/> Not Applicable (not an Acid Rain source)</p> <p>Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p> <p>New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p>
<p>2. CAIR Part (DEP Form No. 62-210.900(1)(b)):</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____</p> <p><input checked="" type="checkbox"/> Not Applicable (not a CAIR source)</p>

Additional Requirements Comment

**ATTACHMENT SWA-FI-CV3
COMPLIANCE REPORT AND PLAN**

ATTACHMENT SWAPBC-FI-CV3 COMPLIANCE REPORT AND PLAN

Emergency Generator – PBCREF Scalehouse (EU 037) Installation

Introduction and Compliance Report

Air Construction Permit No. 0990234-029-AC issued on August 28, 2013, authorized installation and initial operation of Caterpillar® Model D60-8S 60kW Emergency Diesel Generator with 88 hp (66kW) stationary diesel engine to replace the existing emergency generator at the Palm Beach County Renewable Energy Park (PBCREP) Scalehouse (E.U. ID No. 037). Administrative requirement No. 8 of Permit No. 0990234-029-AC requires Solid Waste Authority of Palm Beach County (SWAPBC) to apply for a revised Title V operation permit at least 90 days prior to expiration of the permit, but no later than 180 days after completing the required work and commencing operation [Rule 62-213.420(1)(a), F.A.C.].

Air Project Nos. 0990234-026-AC (issued December 13, 2012) and 0990234-027-AC (issued May 17, 2013) authorized physical changes to the tray scrubbers and cyclonic separators at the Biosolids Pelletization Facility (BPF) and to perform PM/PM₁₀ stack testing to establish CAM parameters for the modified tray scrubbers and cyclonic separators. Air Project No. 0990234-026-AC also requires that within 180 days after tray scrubber/cyclonic separator work is done, SWAPBC will need to submit a Title V air operation permit revision application to include the venturi scrubber(s) in the CAM Plan. Note that the venturi scrubbers were not relied on as PM control equipment in the original application and only the tray scrubbers were included in the CAM plan.

The stack testing has been completed and the Title V revision application to include the venturi scrubbers in the CAM plan is due on November 5, 2013. For the emergency generator, SWAPBC has completed the purchasing agreement, however the unit is not expected to be installed and tested for readiness before November 5, 2013.

Compliance Plan

SWAPBC has purchased the replacement emergency generator/stationary diesel engine for the Palm Beach Renewable Energy Facility (PBREF) Scalehouse and expects the unit to be delivered in November 2013. After installation and readiness testing, the unit is expected to be ready for service by December 31, 2013. SWAPBC will notify FDEP as soon as the installation and readiness testing is complete. Please note that based on Air Construction Permit No. 0990234-029-AC, the unit is subject to NSPS 40 CFR 60, Subpart IIII and manufacturer certification can be provided to the Department in lieu of actual stack testing for the applicable emissions limits.

EMISSIONS UNIT INFORMATION

Section [1]

EU010 - BPF Sludge Dryer Train No. 1

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1]

EU010 - BPF Sludge Dryer Train No. 1

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
BPF Sludge Dryer Train No. 1

3. Emissions Unit Identification Number: **010**

4. Emissions Unit Status Code: A	5. Commence Construction Date: 22 Dec 07	6. Initial Startup Date: 22 May 09	7. Emissions Unit Major Group SIC Code: 49
--------------------------------------------	----------------------------------------------------	----------------------------------------------	------------------------------------------------------

8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit

9. Package Unit:
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: _____ kW

11. Emissions Unit Comment:
337.5 Wet tons per day (wtpd) sludge drying train and associated equipment (Baker Rullman Drum Assembly, Model No. SD-125-42).

EMISSIONS UNIT INFORMATION

Section [1]

EU010 - BPF Sludge Dryer Train No. 1

Emissions Unit Control Equipment/Method: Control 1 of 4

1. Control Equipment/Method Description:
Dry Low-NOx Burner for NOx control

2. Control Device or Method Code: **205**

Emissions Unit Control Equipment/Method: Control 2 of 4

1. Control Equipment/Method Description:
Regenerative Thermal Oxidizer (RTO) for VOC control

2. Control Device or Method Code: **131**

Emissions Unit Control Equipment/Method: Control 3 of 4

1. Control Equipment/Method Description:
Wet Scrubber - High Efficiency for PM control

2. Control Device or Method Code: **001**

Emissions Unit Control Equipment/Method: Control 4 of 4

1. Control Equipment/Method Description:
Venturi Scrubber for PM control

2. Control Device or Method Code: **053**

EMISSIONS UNIT INFORMATION

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EU010 - BPF Sludge Dryer Train No. 1

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: RTO Exhaust Stack		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Dryer Train Nos. 1 and 2 has its own flue within a shared single stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 138 feet	7. Exit Diameter: 2.5 feet	
8. Exit Temperature: 194 °F	9. Actual Volumetric Flow Rate: 15,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: 17 East (km): 585.6 North (km): 2960.08		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

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D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Solid Waste Disposal - Commercial/Institutional; Incineration: Special Purpose; Sewage Sludge Incinerator		
2. Source Classification Code (SCC): 5-02-005-15		3. SCC Units: Wet tons of sludge processed
4. Maximum Hourly Rate: 14.1	5. Maximum Annual Rate: 123,187.5	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: Max hourly rate = 337.5 wtpd x day/24 hr = 14.1 ton/hr. Max annual rate = 337.5 wtpd x 365 day/yr = 123,187.5 tons/yr Rotary sludge dryer with a rated capacity of 40 MMBtu/hr heat input from natural gas and/or landfill gas firing plus an additional 2 MMBtu/hr heat input from RTO. Sludge is neither treated as fuel nor incinerated.		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

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EU010 - BPF Sludge Dryer Train No. 1

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO			EL
NOx			EL
PM/PM10			EL
SO2			EL
VOC			EL
H114			EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions: No change to current potential emissions as a result of the project.	
11. Potential, Fugitive, and Actual Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 3.37 lb/hr	4. Equivalent Allowable Emissions: 3.37 lb/hour 14.75 tons/year
5. Method of Compliance: None - initial testing demonstrated compliance.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS
(Optional for unregulated emissions units.)**

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: No change to current potential emissions as a result of the project.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 5.60 lb/hr	4. Equivalent Allowable Emissions: 5.60 lb/hour 24.55 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Method 7 or 7E.	
6. Allowable Emissions Comment (Description of Operating Method): Allowable emissions based on BACT determination. Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code:
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions: No change to current potential emissions as a result of the project.	
11. Potential, Fugitive, and Actual Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 2.42 lb/hr	4. Equivalent Allowable Emissions: 2.42 lb/hour 10.6 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Method 5.	
6. Allowable Emissions Comment (Description of Operating Method): Allowable emissions based on BACT determination. Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

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EU010 - BPF Sludge Dryer Train No. 1

SO2

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 4.45 lb/hr	4. Equivalent Allowable Emissions: 4.45 lb/hour 19.5 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Method 6C.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 1.0 lb/hr	4. Equivalent Allowable Emissions: 1.0 lb/hour 4.4 tons/year
5. Method of Compliance: None - initial testing demonstrated compliance.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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 H114 - Mercury

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.022 lb/24-hr	4. Equivalent Allowable Emissions: 0.00092 lb/hour 0.004 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Methods 101A or 105.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation **1** of **1**

1. Visible Emissions Subtype: VE5	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: 20 % Maximum Period of Excess Opacity Allowed: 3 min/hour	
4. Method of Compliance: Annual testing using EPA Method 9	
5. Visible Emissions Comment: Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

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EU010 - BPF Sludge Dryer Train No. 1

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

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EU010 - BPF Sludge Dryer Train No. 1

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: August 5, 2013 Test Date(s)/Pollutant(s) Tested: PM/PM10; June 24 - 26, 2013 <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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EU010 - BPF Sludge Dryer Train No. 1

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring: <input checked="" type="checkbox"/> Attached, Document ID: SWA-EU010/011-IV2 _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

ATTACHMENT SWA-EU010/011-IV2
COMPLIANCE ASSURANCE MONITORING PLAN

COMPLIANCE ASSURANCE MONITORING PLAN

Solid Waste Authority of Palm Beach County
North County Resource Recovery Site
Biosolids Pelletization Facility (BPF)

Sludge Dryer Trains #1 and #2
Particulate Matter (PM) Removal by Tray Scrubbers #1 and #2
Revised to Include PM Removal by Venturi Scrubbers #1 and #2

~~October 7, 2010~~
October 23, 2013

COMPLIANCE ASSURANCE MONITORING PLAN:

Biosolids Pelletization Facility - Sludge Dryer – Tray Scrubber and Venturi Scrubber for PM Control

I. Background

A. Emissions Unit

Description: Biosolids Pelletization Facility (BPF)
Identification: Sludge Dryer #1
Sludge Dryer #2

Facility: North County Resource Recovery Facility Site
7501 North Jog Road
West Palm Beach, FL 33412

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation: FDEP Permit No. 0990234-006-AC/PSD-FL-108F,
0990234-022-AV, and 0990234-026-AC

Emission limit:
Particulate matter: 2.42 lb/hr and 10.6 tons/year PM or PM10 for each
dryer train

Monitoring requirement: Initial Stack Test, and at other times as required by
DEP – U.S. EPA Method 5

C. Control Technology

Particulate matter (PM) emissions from the BPF sludge dryer trains #1 and #2 are controlled by wet impingement tray/condenser scrubbers #1 and #2. Each scrubber is a “3-stage” Impinjet® scrubber manufactured by SLY, Inc.

Each tray/condenser scrubber is followed by a “polishing” Venturi scrubber, Venturi scrubbers #1 and #2. This is existing equipment, for which no credit was taken in the initial AC permit or AV revision applications. The Department’s Exemption from Requirement to Obtain an Air Construction Permit and Authorization for Impingement Tray Scrubber and Cyclone Retrofit Project, dated December 13, 2012, requires that the Venturi scrubbers be included in the CAM Plan. Each existing Venturi scrubber is manufactured by SLY, Inc.

~~Tray scrubber. (It is followed by a “polishing” Venturi scrubber. However, no credit was taken in permit application for Venturi scrubber, and emission limits are based on performance of the Tray scrubber alone.)~~

II. Monitoring Approach

The key elements of the monitoring approach are presented in Table 1. The monitoring approach for the impingement tray/condenser scrubbers is unchanged from the CAM Plan in Title V Permit No. 0990234-020-AV, and is shown in Table 1. The monitoring approach for the Venturi scrubbers is added as Table 2. Note that no changes are proposed to the existing monitoring approach for the Impingement Tray / Condenser Scrubbers.

TABLE 1. IMPINGEMENT TRAY/CONDENSER SCRUBBERS MONITORING APPROACH

E.U. ID Nos. 010 & 011	Indicator No. 1	Indicator No. 2
I. Indicator	Water flow (Q) through each wet tray/condenser scrubber	Pressure drop (dP) across each wet tray/condenser scrubber
Measurement Approach	The water flow is monitored with a magnetic flow meter.	The pressure drop is monitored with a differential pressure transmitter.
II. Indicator Range	An excursion is defined as a flow rate less than 1,000 gallons/minute (gpm)* in three consecutive observations over an eight-hour shift. Operators log a one-minute average reading three times per eight-hour shift when feeding sludge. If all three readings in the shift are less than 1,000 gpm, this triggers an inspection, corrective action, and reporting.	An excursion is defined as a pressure drop less than 6.0 inches of water (" H ₂ O)* across the tray scrubber in three consecutive observations over an eight-hour shift. Operators log a one-minute average reading three times per eight-hour shift when feeding sludge. If all three readings in the shift are less than 6.0 " H ₂ O, this triggers an inspection, corrective action, and reporting.
III. Performance Criteria		
A. Data Representativeness	The monitoring system consists of a magnetic flow meter with a sensor located in the water circulation line. Its minimum accuracy is ± 5 percent of full scale.	The monitoring system consists of a differential pressure transmitter that compares the pressure between the inlet and outlet air taps. Its minimum accuracy is ± 5 percent of full scale.
B. Verification of Operational Status	Signal communicated to Supervisory Control And Data Acquisition (SCADA) system.	Signal communicated to SCADA system
C. QA/QC Practices and Criteria	Calibrated according to manufacturer's recommended procedures and frequency.	Calibrated according to manufacturer's recommended procedures and frequency
D. Monitoring Frequency	Data is electronically recorded, continuously.	Data is electronically recorded, continuously.
E. Data Collection Procedures	Rolling 1-minute averages are computed and displayed on analog screen.	Rolling 1-minute averages are computed and displayed on analog screen.
F. Averaging Period	1-minute average	1-minute average

* The excursion level specified in this CAM Plan was established based upon the initial PM test data (September 2009) and the manufacturer's recommendations. The excursion level shall be re-evaluated at the time of permit renewal based upon the new most recent test data and the manufacturer's recommendations.

TABLE 2. VENTURI SCRUBBER MONITORING APPROACH

<u>E.U. ID Nos. 010 & 011</u>	<u>Indicator No. 1</u>	<u>Indicator No. 2</u>
<u>I. Indicator</u>	<u>Water flow (Q) through each Venturi scrubber</u>	<u>Pressure drop (dP) across each Venturi scrubber</u>
<u>Measurement Approach</u>	<u>The water flow is monitored with a magnetic flow meter.</u>	<u>The dP is monitored with a differential pressure transmitter.</u>
<u>II. Indicator Range</u>	<u>An excursion is defined as a flow rate less than 10 gallons/minute (gpm)* in three consecutive observations over an eight-hour shift. Operators log a one-minute average reading three times per eight-hour shift when feeding sludge. If all three readings in the shift are less than 10 gpm, this triggers an inspection, corrective action, and reporting.</u>	<u>An excursion is defined as a dP less than 3.8 inches of water (H₂O)* across the venturi scrubber in three consecutive observations over an eight-hour shift. Operators log a one-minute average reading three times per eight-hour shift when feeding sludge. If all three readings in the shift are less than 3.8 H₂O, this triggers an inspection, corrective action, and reporting.</u>
<u>III. Performance Criteria</u>		
<u>A. Data Representativeness</u>	<u>The monitoring system consists of a magnetic flow meter with a sensor located in the water circulation line. Its minimum accuracy is ± 5 percent of full scale.</u>	<u>The monitoring system consists of a differential pressure transmitter than compares the pressure between the inlet and outlet air traps. Its minimum accuracy is ± 5 percent of full scale.</u>
<u>B. Verification of Operational Status</u>	<u>Signal communicated to Supervisory Control And Data Acquisition (SCADA) system.</u>	<u>Signal communicated to SCADA system.</u>
<u>C. QA/QC Practices and Criteria</u>	<u>Calibrated according to manufacturer's recommended procedures and frequency.</u>	<u>Calibrated according to manufacturer's recommended procedures and frequency.</u>
<u>D. Monitoring Frequency</u>	<u>Data is electronically recorded, continuously.</u>	<u>Data is electronically recorded, continuously.</u>
<u>E. Data Collection Procedures</u>	<u>Rolling 1-minute averages are computed and displayed on analog screen.</u>	<u>Rolling 1-minute averages are computed and displayed on analog screen.</u>
<u>F. Averaging Period</u>	<u>1-minute average.</u>	<u>1-minute average.</u>

*The excursion level specified in this CAM Plan was established based upon PM test data (August 5, 2013). The excursion level shall be re-evaluated at the time of permit renewal based upon the new most recent test data.

JUSTIFICATION

I. Background

The pollutant-specific emission unit is a 337.5-wet-ton-per-day rotary sludge dryer in a process train that dries wastewater treatment plant sludge, and then screens the dried sludge into marketable fertilizer pellets. The BPF has two identical process trains. Sludge Dryer #1 (Sludge Dryer #2 is identical) exhausts to a separator cyclone to remove the pellets and most dust particles from the gas stream; the pellets are then sent to screens for sorting.

The exhaust gases continue to an impingement tray scrubber to remove remaining PM. Cyclone exhaust air enters the bottom of the tray scrubber tower. There is a water inlet at the top. The air flows up through three water-covered perforated plates with impingement baffles. Water enters the top plate, and flows down to successive plates by means of internal passages, or “downcomers”. Water removes PM by impaction on water droplets created by air flowing through water covering the perforated plates and baffles.

About 65 percent of the scrubber exhaust is returned to the dryer as inlet air (and not emitted). About 35 percent goes to a Venturi scrubber as a “polishing” step for PM removal, and then through a regenerative thermal oxidizer (for VOC removal) before being exhausted out the stack to the atmosphere.

~~The tray scrubber alone will reduce 97 percent of the inlet PM.~~ The air permit Best Available Control Technology (BACT) analysis and permit limits for PM, ~~therefore,~~ were based on the control provided by tray scrubber alone, with no additional credit taken for the Venturi scrubber. The May, 2013, Impingement Tray Scrubber and Cyclone Separator Retrofit Project partially restored the design air flow rate of 53,000 acfm through each dryer/cyclone/scrubber train by increasing the depth of the cyclone inlet and replacing the two bottom trays of in the impingement tray scrubber with trays that have larger open areas. With these changes, it was necessary to take credit for PM removal by the Venturi scrubber in order to assure continuous compliance with the permit PM limits. FDEP authorized the changes to the cyclone separator and impingement tray scrubber as exempt from requiring an AC permit on December 13, 2012 (FDEP Project No. 0990234-026-AC). However, in 0990234-026-AC, FDEP required that the Venturi scrubbers be included in the CAM Plan.

The water flow rates to both the impingement/tray scrubber and to the Venturi scrubber are monitored, and the pressure drop between the gas inlet and outlet of both scrubbers are monitored.

II. Rationale for Selection of Performance Indicators

Water flow rate was selected as a primary indicator. When the water flow rate drops below design flows, insufficient water is being applied to the exhaust gas stream to remove PM from the exhaust. The most likely causes of low water flow are failure of a recirculation pump or fouling of its associated heat exchanger.

Pressure drop was selected as a secondary performance indicator because maintaining an adequate water flow maintains the correct pressure drop and ensures adequate particulate removal.

III. Rationale for Selection of Indicator Ranges

A. Impingement Tray/Condenser Scrubbers

The selected indicator range for the water flow rate is greater than or equal to 1,000 gallons per minute (gpm). The selected indicator range for scrubber pressure drop is greater than or equal to 6.0 in. H₂O. Operators check the continuous SCADA analog displays for these parameters three times each eight-hour shift, and write down on a log sheet the one-minute average reading for scrubber water flow rate and pressure drop. When all three of these readings in an eight-hour shift are below the indicator range for either parameter, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All such excursions will be documented and reported in the Title V Permit Semi-Annual Report. The indicator levels for the scrubber water flow rate and pressure drop are based on normal scrubber operation, **manufacturer's recommendations**, and the initial performance test results.

The attached letter from Sly, Inc. states that the Impinjet® Tray Scrubbers are designed to provide the design PM removal efficiency at a minimum pressure drop of 6.0 in. H₂O, and a minimum flow rate of 159 gallons per minute (gpm). However, the Solid Waste Authority operates the scrubbers at much higher water flow rates (at least 1,000 gpm), because the tray scrubbers also serve as condensers cooling the hot dryer exhaust gases. If the water flow rate were to drop substantially below 1,000 gpm, air flow to the downstream fan would increase, overloading the motor, and causing it to shut down. A fan shutdown automatically shuts down the dryer. This fail-safe shutdown would occur, therefore, long before scrubber water flows became so low as to allow excess PM emissions.

The initial source testing (~~and most recent source testing~~) of the BPF sludge dryer trains was conducted in September, 2009. The scrubber was operating under normal conditions and the average scrubber water flow rate was between 1,000 and 1,100 gallons per minute. During this performance test, the average pressure drop was approximately 10 in. H₂O. Three PM test runs were conducted on each sludge dryer train exhaust stack, after the RTO, using U.S. EPA Method 5. During testing, the measured PM emissions from Sludge Dryer #1 averaged 0.162 lb/hr. The PM emissions from Sludge Dryer #2 averaged 0.193 lb/hr. Each of these measured PM emission rates was well below the permit limit of 2.42 lb/hr for each sludge dryer train. During the emissions test, the scrubber water flow and pressure drop were measured continuously. The complete test results are documented in the test report.

B. Venturi Scrubbers

The selected indicator range for the water flow rate is greater than or equal to 10 gpm. The selected indicator range for scrubber pressure drop is greater than or equal to 3.8 in. H₂O. As for the impingement tray/condenser scrubbers, operators check the SCADA displays for these

parameters three times each eight-hour shift when sludge is being fed, and log the one-minute average reading for scrubber water flow rate and pressure drop. When all three of these readings in an eight-hour shift are below the indicator range for either parameter, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported in the Title V Permit Semi-Annual Report. The indicator levels for the Venturi scrubber water flow rate and pressure drop are based on normal scrubber operation, operator experience, and performance testing conducted in June, 2013.

The Sly, Inc., manufacturer's recommendations for stand-alone operation are to operate the Venturi scrubbers at a water flow rate of 109 gpm and a pressure drop of 12.0 in. H₂O. Operator experience suggested that alternative water flow rate and pressure drop parameters could be established for the Venturi scrubbers that would ensure continuous compliance with PM emission limits. The CAM Plan requirements in 40 CFR 64.4(b) state that: "If the performance specifications proposed to satisfy §64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences between the requirements proposed by the owner or operator and the manufacturer's recommendations or requirements. The owner or operator also shall submit any data supporting the justification, and may refer to generally available sources of information used to support the justification. . . " New England Fertilizer Company (NEFCO), the BPF Operator, also operates the Greater Lawrence Sanitary District (GLSD) dryers located in North Andover, MA. The GLSD dryers are equipped with Sly tray scrubber/condensers and Sly Venturi scrubbers similar to those at the BPF. The pressure drop and extrapolated water flows of the GLSD tray scrubbers are also very similar to those at the BPF subsequent to the most recent modification. Three rounds of stack testing at GLSD indicated that at flow rates of 0, 10 and 35 gpm (well below the manufacturer-recommended 109 gpm), the Venturi scrubbers provided sufficient assurance that the PM limits would be met comfortably. With this experience in mind, similar stack testing was conducted at the BPF.

Testing conducted at the BPF in June, 2013, is contained in the attached PM/PM₁₀ Compliance Testing Report, dated August 5, 2013. The upstream impingement tray/condenser scrubber in each train was maintained at normal conditions (approximately 1,100 gpm and pressure drop of approximately 8.0 to 9.0 in. H₂O), and the sludge feed rate was maintained at over 13 wet tons per hour (over 92% of the design/permitted feed rate). "Tuning" PM testing was conducted for four Venturi scrubber water flow rate set points on each train: 109 gpm, 55 gpm, 10 gpm, and 0 gpm. These "tuning" results, shown in Tables 2-1 and 2-2 in the attached report, demonstrated that the PM permit limit of 2.42 lb/hr was met for all of these conditions.

Preliminary and Compliance testing was then conducted for each of the two sludge dryer/tray scrubber/Venturi scrubber/RTO trains with the Venturi scrubber flow set to 10 gpm and the pressure drop set to "wide open." This produced a total of six one-hour runs on each sludge dryer train exhaust stack, after the RTO, using U.S. EPA Method 5. The scrubber water flow and pressure drop were measured continuously during each run. The complete set of results are shown in Tables 2-3, 2-4, 2-5 and 2-6 in the attached report. Tables 3 and 4 summarize these results. For BPF Sludge Dryer Train #1, each of the six individual one-hour-average runs had a PM emission rate well below the permit limit of 2.42 lb/hr, and also below the 2009 stack test

result of 0.162 lb/hr. The lowest one-hour average Venturi scrubber water flow for the six runs was 10.0 gpm, and the lowest pressure was 3.8 inches H₂O. Similarly, BPF Sludge Dryer Train #2 had each of its six individual one-hour-average runs produce a PM emission rate well below the permit limit, and also below the 2009 stack test result. The lowest one-hour average Venturi scrubber water flow for Train #2's six runs was 9.4 gpm, and the lowest pressure was 3.4 inches H₂O.

Based on these results, a Venturi scrubber flow rate of 10.0 gpm and a pressure drop of 3.8 inches H₂O are proposed as indicator levels for both Venturi scrubbers.

TABLE 3: PM/PM10 TEST RESULTS FOR BPF SLUDGE DRYER TRAIN #1

<u>Run No.</u>	<u>June 26 and 27, 2013</u> <u>Run I.D.</u>	<u>Venturi</u> <u>Scrubber Flow</u> <u>(gpm)</u>	<u>Venturi</u> <u>Scrubber</u> <u>Pressure (in</u> <u>H₂O)</u>	<u>PM/PM10</u> <u>Emission Rate</u> <u>(lb/hr)</u>
<u>1</u>	<u>U1-M5-Pre5</u>	<u>10.0</u>	<u>4.3</u>	<u>0.100</u>
<u>2</u>	<u>U1-M5-Pre6</u>	<u>10.8</u>	<u>4.1</u>	<u>0.086</u>
<u>3</u>	<u>U1-M5-Pre7</u>	<u>10.6</u>	<u>4.4</u>	<u>0.103</u>
	<u>Average</u>	<u>10.5</u>	<u>4.3</u>	<u>0.096</u>
	<u>Range</u>	<u>10.0 – 10.8</u>	<u>4.1 – 4.4</u>	<u>0.086 – 0.103</u>
<u>4</u>	<u>U1-M5-R1</u>	<u>10.3</u>	<u>3.8</u>	<u>0.085</u>
<u>5</u>	<u>U1-M5-R2</u>	<u>10.7</u>	<u>4.1</u>	<u>0.083</u>
<u>6</u>	<u>U1-M5-R3</u>	<u>10.1</u>	<u>4.0</u>	<u>0.043</u>
	<u>Average</u>	<u>10.4</u>	<u>4.0</u>	<u>0.070</u>
	<u>Range</u>	<u>10.1 – 10.7</u>	<u>3.8 – 4.1</u>	<u>0.043 – 0.083</u>
	<u>2009 Test Result</u>			<u>0.162</u>
	<u>Permit Limit</u>			<u>2.42</u>

TABLE 4: PM/PM10 TEST RESULTS FOR BPF SLUDGE DRYER TRAIN #2

<u>Run No.</u>	<u>Run I.D.</u>	<u>Venturi</u> <u>Scrubber Flow</u> <u>(gpm)</u>	<u>Venturi</u> <u>Scrubber</u> <u>Pressure (in</u> <u>H₂O)</u>	<u>PM/PM10</u> <u>Emission Rate</u> <u>(lb/hr)</u>
<u>1</u>	<u>U2-M5-Pre5</u>	<u>10.3</u>	<u>3.9</u>	<u>0.044</u>
<u>2</u>	<u>U2-M5-Pre6</u>	<u>9.4</u>	<u>3.4</u>	<u>0.055</u>
<u>3</u>	<u>U2-M5-Pre7</u>	<u>10.5</u>	<u>3.6</u>	<u>0.046</u>
	<u>Average</u>	<u>10.0</u>	<u>3.6</u>	<u>0.048</u>
	<u>Range</u>	<u>9.4 – 10.5</u>	<u>3.4 – 3.9</u>	<u>0.044 – 0.055</u>
<u>4</u>	<u>U2-M5-R1</u>	<u>10.7</u>	<u>3.6</u>	<u>0.054</u>
<u>5</u>	<u>U2-M5-R2</u>	<u>10.3</u>	<u>3.5</u>	<u>0.040</u>
<u>6</u>	<u>U2-M5-R3</u>	<u>10.2</u>	<u>3.8</u>	<u>0.103</u>
	<u>Average</u>	<u>10.4</u>	<u>3.6</u>	<u>0.066</u>
	<u>Range</u>	<u>10.2 – 10.7</u>	<u>3.5 – 3.8</u>	<u>0.040 – 0.103</u>
	<u>2009 Test Result</u>			<u>0.193</u>
	<u>Permit Limit</u>			<u>2.42</u>

EMISSIONS UNIT INFORMATION

Section [1]

EU011 - BPF Sludge Dryer Train No. 2

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1]

EU011 - BPF Sludge Dryer Train No. 2

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
EU011 - BPF Sludge Dryer Train No. 2

3. Emissions Unit Identification Number: **011**

4. Emissions Unit Status Code: A	5. Commence Construction Date: 22 Dec 07	6. Initial Startup Date: 22 May 09	7. Emissions Unit Major Group SIC Code: 49
--------------------------------------------	----------------------------------------------------	----------------------------------------------	------------------------------------------------------

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

9. Package Unit:
 Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: _____ kW

11. Emissions Unit Comment:
337.5 Wet tons per day (wtpd) sludge drying train and associated equipment (Baker Rullman Drum Assembly, Model No. SD-125-42).

EMISSIONS UNIT INFORMATION

Section [1]

EU011 - BPF Sludge Dryer Train No. 2

Emissions Unit Control Equipment/Method: Control 1 of 4

1. Control Equipment/Method Description:
Dry Low-NOx Burner for NOx control

2. Control Device or Method Code: **205**

Emissions Unit Control Equipment/Method: Control 2 of 4

1. Control Equipment/Method Description:
Regenerative Thermal Oxidizer (RTO) for VOC control

2. Control Device or Method Code: **131**

Emissions Unit Control Equipment/Method: Control 3 of 4

1. Control Equipment/Method Description:
Wet Scrubber - High Efficiency for PM control

2. Control Device or Method Code: **001**

Emissions Unit Control Equipment/Method: Control 4 of 4

1. Control Equipment/Method Description:
Venturi Scrubber for PM control

2. Control Device or Method Code: **053**

EMISSIONS UNIT INFORMATION

Section [1]

EU011 - BPF Sludge Dryer Train No. 2

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: RTO Exhaust Stack		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Dryer Train Nos. 1 and 2 has its own flue within a shared single stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 138 feet	7. Exit Diameter: 2.5 feet	
8. Exit Temperature: 194 °F	9. Actual Volumetric Flow Rate: 15,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: 17 East (km): 585.6 North (km): 2960.08		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [1]

EU011 - BPF Sludge Dryer Train No. 2

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Solid Waste Disposal - Commercial/Institutional; Incineration: Special Purpose; Sewage Sludge Incinerator		
2. Source Classification Code (SCC): 5-02-005-15		3. SCC Units: Wet tons of sludge processed
4. Maximum Hourly Rate: 14.1	5. Maximum Annual Rate: 123,187.5	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: Max hourly rate = 337.5 wtpd x day/24 hr = 14.1 ton/hr. Max annual rate = 337.5 wtpd x 365 day/yr = 123,187.5 tons/yr Rotary sludge dryer with a rated capacity of 40 MMBtu/hr heat input from natural gas and/or landfill gas firing plus an additional 2 MMBtu/hr heat input from RTO. Sludge is neither treated as fuel nor incinerated.		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 3.37 lb/hr	4. Equivalent Allowable Emissions: 3.37 lb/hour 14.75 tons/year
5. Method of Compliance: None - initial testing demonstrated compliance.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 5.60 lb/hr	4. Equivalent Allowable Emissions: 5.60 lb/hour 24.55 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Method 7 or 7E.	
6. Allowable Emissions Comment (Description of Operating Method): Allowable emissions based on BACT determination. Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

Section [1]
 EU011 - BPF Sludge Dryer Train No. 2

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 PM/PM10

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 2.42 lb/hr	4. Equivalent Allowable Emissions: 2.42 lb/hour 10.6 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Method 5.	
6. Allowable Emissions Comment (Description of Operating Method): Allowable emissions based on BACT determination. Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: No change to current potential emissions as a result of the project.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 4.45 lb/hr	4. Equivalent Allowable Emissions: 4.45 lb/hour 19.5 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Method 6C.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

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EU011 - BPF Sludge Dryer Train No. 2

VOC

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: No change to current potential emissions as a result of the project.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 1.0 lb/hr	4. Equivalent Allowable Emissions: 1.0 lb/hour 4.4 tons/year
5. Method of Compliance: None - initial testing demonstrated compliance.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.022 lb/24-hr	4. Equivalent Allowable Emissions: 0.00092 lb/hour 0.004 tons/year
5. Method of Compliance: Testing prior to operating permit renewal using EPA Methods 101A or 105.	
6. Allowable Emissions Comment (Description of Operating Method): Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE5	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: 20 % Maximum Period of Excess Opacity Allowed: 3 min/hour	
4. Method of Compliance: Annual testing using EPA Method 9	
5. Visible Emissions Comment: Permit No. 0990234-006-AC/PSD-FL-108F and Title V Air Permit No. 0990234-022-AV.	

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

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H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

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I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: August 5, 2013 Test Date(s)/Pollutant(s) Tested: PM/PM10; June 24 - 26, 2013 <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

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EU037 - Emergency Generator

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Emergency Generator/Stationary Diesel Engine - PBREF Scalehouse.

3. Emissions Unit Identification Number: **037**

4. Emissions Unit Status Code: C	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 49
--------------------------------------------	--------------------------------	--------------------------	------------------------------------------------------

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

9. Package Unit:
Manufacturer: **Caterpillar** Model Number: **D60-8S**

10. Generator Nameplate Rating: **60 kW**

11. Emissions Unit Comment:
Caterpillar D60-8S emergency diesel generator set associated with 88.5 bhp Caterpillar C4.4 diesel engine.

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Emissions Unit Control Equipment/Method: Control ____ of ____

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ____ of ____

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ____ of ____

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ____ of ____

1. Control Equipment/Method Description:

2. Control Device or Method Code:

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B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate:		
3. Maximum Heat Input Rate:	0.72 million Btu/hr	
4. Maximum Incineration Rate:	pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	24 hours/day 52 weeks/year	7 days/week 8,760 hours/year
6. Operating Capacity/Schedule Comment:	The emergency engine will operate a combined total of 100 hr/yr for maintenance checks, readiness testing, and emergency demand response, which includes a maximum 50 hr/yr for non-emergency operation. Maximum heat input based on 5.2 gal/hr of No. 2 fuel usage and 138,000 Btu/gal. There are no limits for emergency operation.	

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C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 3			
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:					
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:					
5. Discharge Type Code:		6. Stack Height: feet		7. Exit Diameter: feet	
8. Exit Temperature: °F		9. Actual Volumetric Flow Rate: acfm		10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm			12. Nonstack Emission Point Height: feet		
13. Emission Point UTM Coordinates... Zone: East (km): North (km):			14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)		
15. Emission Point Comment:					

EMISSIONS UNIT INFORMATION

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D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Internal Combustion Engines; Electric Generation; Distillate Oil; Reciprocating		
2. Source Classification Code (SCC): 2-01-001-02		3. SCC Units: Thousand Gallons Burned
4. Maximum Hourly Rate: 0.0052	5. Maximum Annual Rate: 0.52	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.0015	8. Maximum % Ash:	9. Million Btu per SCC Unit: 136
10. Segment Comment: Max annual rate = 5.2 gal/hr x 100 hr/yr = 520 gal/yr. Hourly fuel usage based on manufacturer data.		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.73 lb/hour 0.037 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 5.0 g/kWhr Reference: 40 CFR 60 Subpart IIII		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Potential hourly = 5 g/kW-hr x 66 kW/hr x lb/453.6 g = 0.73 lb/hr Potential annual = 0.73 lb/hr x 100 hr/yr x ton/2000 lb = 0.037 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 5.0 g/kWhr	4. Equivalent Allowable Emissions: 0.73 lb/hour 0.037 tons/year
5. Method of Compliance: Maintain manufacturer certification	
6. Allowable Emissions Comment (Description of Operating Method): 40 CFR 60 SUBpart IIII [Rule 60.4205(b)] and 40 CFR 89.112(a) and Air Construction Permit No. 0990234-029-AV.	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.68 lb/hour 0.034 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 4.7 g/kW-hr Reference: 40 CFR 60 Subpart IIII		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Potential hourly = 4.7 g/kW-hr x 66 kW/hr x lb/453.6 g = 0.68 lb/hr Potential annual = 0.68 lb/hr x 100 hr/yr x ton/2000 lb = 0.034 TPY			
11. Potential, Fugitive, and Actual Emissions Comment: Note: Emission rate of 4.7g/kW-hr includes non-methane hydrocarbon (NMHC) emissions.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 4.7 g/kWhr	4. Equivalent Allowable Emissions: 0.68 lb/hour 0.034 tons/year
5. Method of Compliance: Maintain manufacturer certification	
6. Allowable Emissions Comment (Description of Operating Method): 40 CFR 60 Subpart IIII [Rule 60.4205(b)] and 40 CFR 89.112(a) and Air Construction Permit No. 0990234-029-AV. Allowable emissions include non-methane hydrocarbon (NMHC) emissions.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.06 lb/hour 0.003 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.4 g/kWhr Reference: 40 CFR 60 Subpart IIII		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Potential hourly = 0.40 g/kW-hr x 66 kW/hr x lb/453.6 g = 0.06 lb/hr Potential annual = 0.06 lb/hr x 100 hr/yr x ton/2000 lb = 0.003 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.40 g/kWhr	4. Equivalent Allowable Emissions: 0.06 lb/hour 0.003 tons/year
5. Method of Compliance: Maintain manufacturer certification	
6. Allowable Emissions Comment (Description of Operating Method): 40 CFR 60 Subpart IIII [Rule 60.4205(b)] and 40 CFR 89.112(a) and Air Construction Permit No. 0990234-029-AV.	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.0006 lb/hour 0.00003 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.006 lb/hr (0.0015% S fuel) Reference: 40 CFR 60 Subpart IIII		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:		
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years		
10. Calculation of Emissions: Potential annual = 0.0006 lb/hr x 100 hr/yr x ton/2000 lb = 0.00003 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: Maximum S content 0.0015% by weight\	4. Equivalent Allowable Emissions: 0.0006 lb/hour 0.00003 tons/year
5. Method of Compliance: Fuel specification	
6. Allowable Emissions Comment (Description of Operating Method): 40 CFR 60 Subpart IIII [Rule 60.4207(b)] and 40 CFR 80.510(b) and Air Construction Permit No. 0990234-029-AV.	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NMHC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.22 lb/hour 0.011 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 4.7 g/kW-hr Reference: 40 CFR 60 Subpart III		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: See Table 1 in Part II.			
11. Potential, Fugitive, and Actual Emissions Comment: Note: Emission rate of 4.7g/kW-hr includes NO_x.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ____ of ____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

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G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: Rule 62-296.320(4)(b), F.A.C., General visible emissions standard.	

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

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H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

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I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

<p>1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____</p> <p><input checked="" type="checkbox"/> Not Applicable (construction application)</p>
<p>5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p>
<p>6. Compliance Demonstration Reports/Records:</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p>Test Date(s)/Pollutant(s) Tested: _____</p> <p><input type="checkbox"/> Previously Submitted, Date: _____</p> <p>Test Date(s)/Pollutant(s) Tested: _____</p> <p><input type="checkbox"/> To be Submitted, Date (if known): _____</p> <p>Test Date(s)/Pollutant(s) Tested: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p> <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
<p>7. Other Information Required by Rule or Statute:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>

At Golder Associates we strive to be the most respected global group of companies specializing in ground engineering and environmental services. Employee owned since our formation in 1960, we have created a unique culture with pride in ownership, resulting in long-term organizational stability. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees now operating from offices located throughout Africa, Asia, Australasia, Europe, North America and South America.

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