Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation

THROUGH: Jon Holtom, Title V Section

FROM: Teresa Heron

DATE: October 16, 2009

SUBJECT: Draft/Proposed Title V Air Operation Permit Revision No. 0112119-014-AV
Draft Air Construction Permit Modification No. 0112119-013-AC (PSD-FL-105D)
Wheelabrator South Broward, Inc. - South Broward Waste-to-Energy Facility
Title V Air Operation Permit Revision and Air Construction Permit Modification

Attached for your review are the following items:

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

The draft/proposed Title V air operation permit is a revised Title V air operation permit for the South Broward Waste-to-Energy Facility in Broward County, Florida. The Statement of Basis provides a summary of the project and the rationale for issuance. The permit modification revises certain specific conditions of air construction permit PSD-FL-105B and Title V Permit 0112119-011-AV related to the carbon injection system for mercury control and clarification of applicable NSPS Subparts. The P.E. certification briefly summarizes the proposed project.

The application was received on July 20, 2009. A RAI letter (e-mail) was sent on August 17, 2009. A response was received on August 31, 2009. Day 90 is December 30. There is no ongoing/open enforcement case for this facility, as advised by the Southeast District Office.

I recommend your approval of the attached draft/proposed Title V air operation permit revision and the draft air construction permit modification.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

Wheelabrator South Broward, Inc.
4400 South State Road 7
Ft. Lauderdale, Florida 33314

Permit No. 0112119-013-AC
0112119-014-AV
Facility ID No. 0112119
South Broward Waste-to-Energy Facility
PSD and Title V Revision
Broward County, Florida

PROJECT DESCRIPTION

The applicant applied on July 20, 2009 to the Department for an air construction permit modification and a revision of the Title V air operation permit. The requested revisions are to change some specific conditions of both the PSD and the Title V permit to reflect updated rule applicability and the installation of the activated carbon injection system for mercury control. The proposed project revisions involve no changes in the previously permitted capacity limitations or emission limits.

I HEREBY CERTIFY *that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*

This review was conducted by Teresa Heron under my responsible supervision.

Jonathan Holtom 10/27/09

Jonathan K. Holtom, P.E. Date
Registration Number: 0052664

Florida Department of Environmental Protection
Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

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

Electronic Mail – Received Receipt Requested

Jairaj Gosine, Plant Manager
Wheelabrator South Broward, Inc.
4400 South State Road 7
Ft. Lauderdale, Florida, 33314

Re: DRAFT/PROPOSED Permit Nos. 0112119-014-AV and 0112119-013-AC (PSD-FL-105D)
Wheelabrator South Broward, Inc.
Air Construction Permit Modification and Title V Air Operation Permit Revision

Dear Mr.Gosine:

Enclosed is the draft permit package package for an air construction permit modification and a Title V air operation permit revision for the South Broward Waste-to-Energy. This facility is located in Broward County at 4400 South State Road 7, Ft. Lauderdale, Florida. The permit package includes the following documents:

- The draft air construction permit modification and supporting technical evaluation and preliminary determination document.
- The statement of basis, which summarizes the facility, the equipment and the primary rule applicability for the initial Title V air operation permit.
- The draft/proposed revised Title V air operation permit, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permits provides important information regarding: the Permitting Authority's intent to issue air permits for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue air permits; the procedures for submitting comments on the draft/proposed permits; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permits is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Title V Air Permits must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication.

If you have any questions, please contact the Project Engineer, Teresa Heron, by telephone at (850) 921-9529 or by email at teresa.heron@dep.state.fl.us .

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

10/28/09
Date

TLV/jh//th

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION AND REVISED TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for an Air Construction Permit Modification and a Title V Air Operation PermitRevision by:

Wheelabrator South Broward, Inc.
4400 South State Road 7
Ft. Lauderdale, Florida 33314
Responsible Official::
Jairaj Gosine, Plant Manager

Draft/Proposed 0112119-014-AV
Draft 0112119-013-AC (PSD-FL-105D)
Facility ID No. 0112119 - Permit Revisions
South Broward Waste-to-Energy Facility
Broward County, Florida

Facility Location: Wheelabrator South Broward, Inc operates the South Broward Waste-to-Energy, which is located at 4400 South State Road 7 in Broward County, Florida.

Project: The purpose of this project is to issue an air construction permit modification and a revised Title V air operation permit for the facility. Details of the project are provided in the application and the enclosed Statement of Basis.

This air construction permit modification updates rule applicability citations and specific conditions related to the new installation of the activated carbon injection (ACI) system for mercury (Hg) control. The proposed project revisions involve no changes in the previously permitted capacity limitations or emission limits of Permit PSD-FL-105B. Other minor changes were made as described in the project's Technical Evaluation and Preliminary Determination document and the enclosed Statement of Basis.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work.

Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permits, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website: http://www.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue an air construction permit modification to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft air construction permit modification unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

WRITTEN NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION AND REVISED TITLE V AIR OPERATION PERMIT

The Permitting Authority gives notice of its intent to issue a revised Title V air operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a revised final permit in accordance with the conditions of the draft/proposed permit revision unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permits (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the draft air construction permit modification for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the draft air construction permit modification, the Permitting Authority shall revise the draft air construction permit modification and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit revision, the Permitting Authority shall issue a revised draft/proposed permit revision and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the

address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available in this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: http://www.epa.gov/region4/air/permits/Florida.htm.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W.,

Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at http://www.epa.gov/region4/air/permits/Florida.htm .

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that either this Written Notice of Intent to Issue an Air Construction Permit Modification and a revised Title V Air Operation Permit (including the Public Notice, the Statement of Basis, the Draft/Proposed Permits and Technical Evaluation and Preliminary Determination), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 10/29/09 to the persons listed below.

Mr. Jairaj Gosine, Wheelabrator, South Broward: jgosine@wm.com
Mr. Kennard F. Kosky, P.E., Golder & Associates: kkosky@golder.com
Mr. Joe Lurix, DEP Southeast District Office: joe.lurix@dep.state.fl.us
Ms. Daniella Banu, Broward County Local Air Program: dbanu@broward.org
Ms. Gracy Danois, U.S. EPA Region 4: danois.gracy@epa.gov
Ms. Ana Oquendo, US EPA Region 4: oquendo.ana@epa.gov
Ms. Kathleen Forney, U.S. EPA Region 4: forney.katy@epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for read file)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) (Date) 10/29/09

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft/Proposed Air Title V Permit Revision No. 0112119-014-AV
Draft Air Construction Permit Modification No. 0112119-013-AC (PSD-FL-105D)
Wheelabrator South Broward, Inc., South Broward Waste-to-Energy
Broward County, Florida

Applicant: The applicant for this project is Wheelabrator South Broward, Inc. The applicant's authorized representative and mailing address is: Jairaj Gosine, Plant Manager, Wheelabrator South Broward, Inc., South Broward Waste-to-Energy, 4400 South State Road 7, Ft. Lauderdale, Florida, 33314.

Facility Location: Wheelabrator South Broward, Inc., operates the existing South Broward Waste-to-Energy, which is located in Broward County at 4400 South State Road 7 in Ft. Lauderdale, Florida.

Facility Information: This facility consists of three 67.6 MW (nominal) municipal solid waste combustors (Unit Nos. 1, 2 and 3) with auxiliary burners, lime storage and processing facilities, ash storage and processing facilities, a cooling tower, and ancillary support equipment. Electricity is sold to the local utility. Each unit has a maximum capacity of 863 tons per day (TPD) of waste input. Each unit includes an acid gas, air toxics, and particulate emissions control system consisting of a lime spray dryer and fabric filter baghouse (SDA/FF); and a urea injection system that operates under the principle of selective non-catalytic reduction (SNCR) for the control of nitrogen oxides. A powdered activated carbon injection (ACI) system located prior to the acid gas control device of each unit provides further control of mercury (Hg) emissions. The ACI system for Hg control would also enhance dioxin/furan (D/F) control. There is a metals recovery system which is a potential source of fugitive emissions.

Project: The applicant applied on July 20, 2009 to the Department for an air construction permit modification and a revision of the Title V air operation permit. The requested revisions are to change some specific conditions of both the PSD and the Title V permit to reflect updated rule applicability and the installation of the activated carbon injection system for mercury control. The proposed project revisions involve no changes in the previously permitted capacity limitations or emission limits.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project.

Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft air construction permit modification, the draft/proposed Title V air operation permit revision, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website: http://www.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at

the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit modification to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the proposed draft air construction permit modification unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

The Permitting Authority gives notice of its intent to issue a Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final Title V air operation permit revision in accordance with the conditions of the draft/proposed Title V air operation permit revision unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the draft air construction permit modification for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the draft air construction permit modification, the Permitting Authority shall revise the draft air construction permit modification and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed Title V air operation permit revision , the Permitting Authority shall issue a revised draft/proposed Title V air operation permit revision and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any

subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45–day review of this project and the deadline for submitting a citizen petition can be found at the following website address: http://www.epa.gov/region4/air/permits/Florida.htm.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at http://www.epa.gov/region4/air/permits/Florida.htm.

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

Wheelabrator South Broward, Inc.

Permit Modifications

South Broward Facility Units 1, 2 and 3

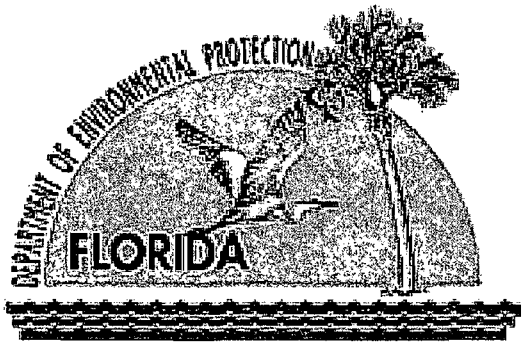
Standard Industrial Classification (SIC) Code No. 4953

Municipal Waste Combustors

Broward County

DEP File No. 0112119-013-AC

PSD-FL-105D



Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

October 30, 2009

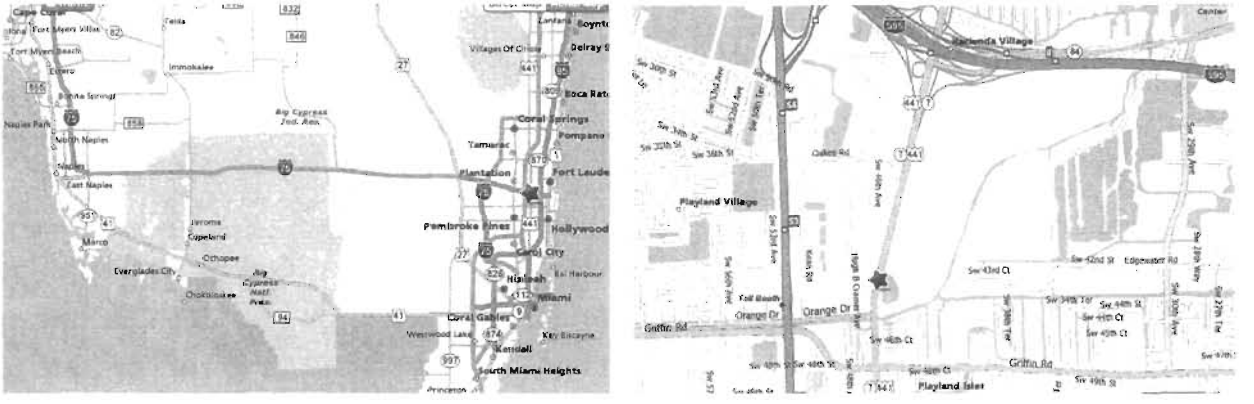
1. GENERAL PROJECT INFORMATION

Facility Description and Location

The applicant, Wheelabrator South Broward, Inc. (Wheelabrator) operates the existing South Broward Waste-to Energy (WTE) Facility, which is located in Broward County at 4400 South State Road 7 in Ft. Lauderdale. The UTM coordinates are Zone 17; 579.54 kilometers (km) East and 2,883.34 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a national Ambient Air Quality Standard (AAQS).

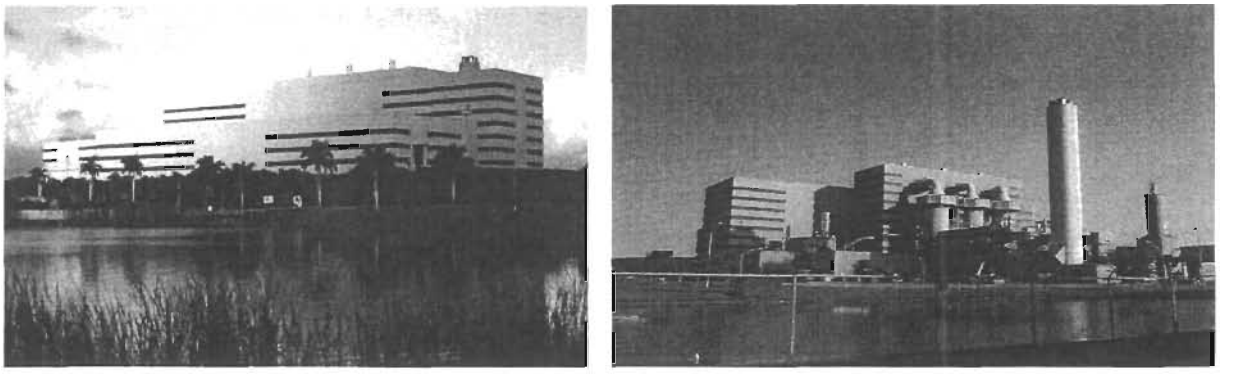
This facility consists of three municipal waste combustors (MWC) with auxiliary burners, lime storage and processing facilities, ash storage and processing facilities, a cooling tower, and ancillary support equipment. Each unit has a maximum capacity of 863 tons per day (TPD) of waste input. There is a metals recovery system which is a potential source of fugitive emissions. The nominal (generator nameplate) electric generating capacity of the facility is 67.6 megawatts (MW), which is sold to the local utility.

The following map indicates the location of the existing Wheelabrator South Broward WTE Facility.



Wheelabrator South Broward WTE Facility location in Fort Lauderdale.

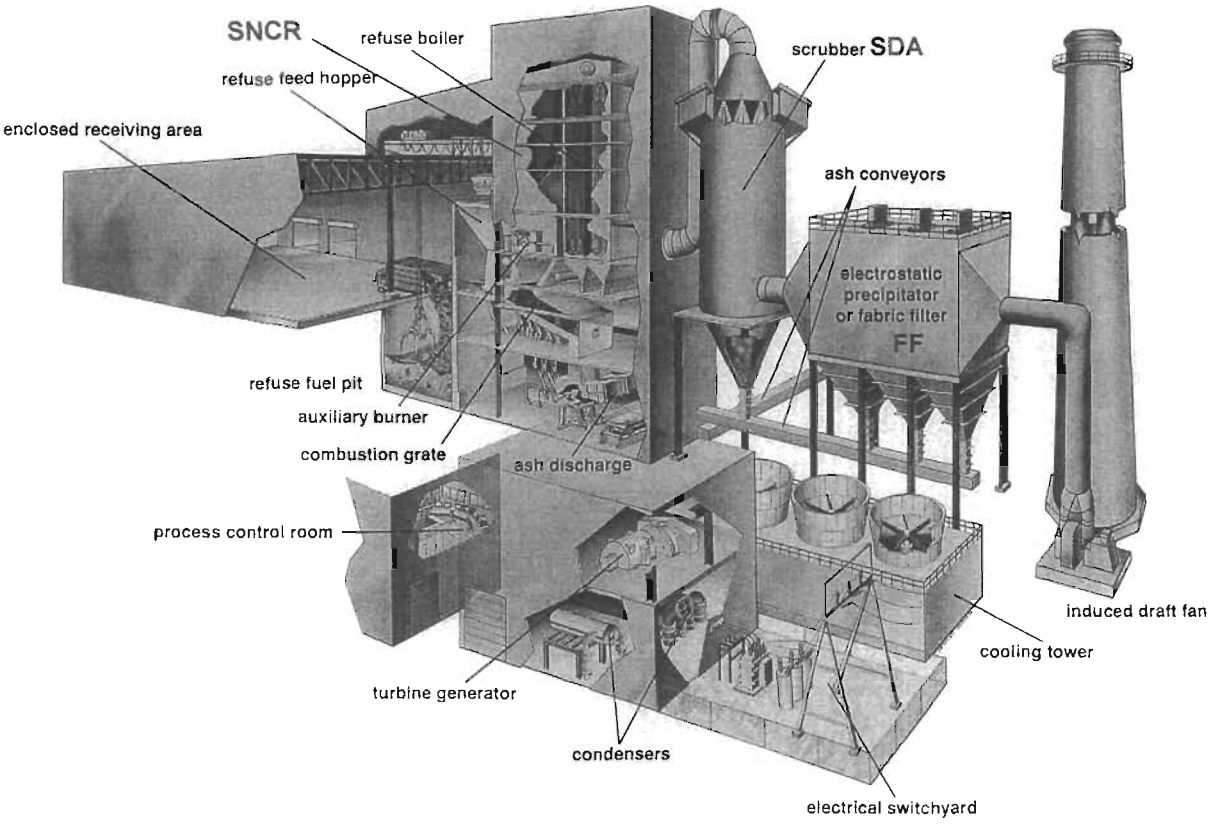
Following is a photograph of the front of the Wheelabrator South Broward WTE Facility (Source Wheelabrator) and a photograph of the rear of the nearly identical Wheelabrator North Broward WTE (Linero 1999). The three exhaust gas ducts from the boilers are visible along with the exhaust stack containing the three flues.



Photographs of Wheelabrator South and North WTE Facilities.

Process Description

The following diagram is of the basic waste-to-energy process and control equipment at a typical Wheelabrator facility. Each unit includes an acid gas, air toxics, and particulate emissions control system consisting of: a urea injection system that operates on the principle of selective non-catalytic reduction (SNCR); a lime spray dryer absorber (SDA); and a fabric filter baghouse (FF).



Wheelabrator Mass Burn Waste-to-Energy Process including Pollution Control System.

The three MWC are designated as Emissions Units (E.U.) Nos. 1, 2 and 3 and are listed in the following table from the most recent PSD Permit modification and Title V operation permits issued to Wheelabrator. These units are affected by this project.

E.U. ID No.	Brief Description
001	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 1
002	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 2
003	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 3

Facility Regulatory Categories

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units (Units 1, 2 and 3) not subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

Siting: This facility is certified under the Florida Power Plant Siting Act (FPPSA), 403.501-518, F.S.

Project Description

Wheelabrator submitted an application for modification of its prevention of significant deterioration of air quality (PSD permit) originally issued by the U.S. Environmental Protection Agency (EPA). The requested modification/revisions are to change some specific conditions of both the PSD and the Title V permits to reflect updated rule applicability and the installation of the activated carbon injection (ACI) system for mercury (Hg) control.

The proposed project modifications/revisions involve no changes in the previously permitted capacity limitations (charging rate monitoring, etc) compared with those in the Permit PSD-FL-105 and modifications thereto (PSD-105A, 105B, and 105C) and the facility Title V operation permit.

The original Permit PSD-FL-105 required the SDA and FF. Permit Modification PSD-105A authorized the use of Method 29 for the testing of metals. Permit Modification PSD-105B authorized the SNCR system. Permit Modification PSD-FL-105C authorized the installation of the ACI system for further Hg control. The ACI system for Hg control would also enhance dioxin/furan (D/F) control.

The facility's Title V operation permit will be updated concurrent with this PSD permit modification.

Processing Schedule

Title V Application received July 20, 2009
E-mail requesting additional information sent August 17, August 19, and August 26, 2009
Additional Information received by e-mail August 17, August 19, and August 31, 2009
Draft/Proposed Title V permit sent out on October 30, 2009
Publication of the Public Notice _____

Relevant Documents

The following relevant documents and related correspondence are part of this permit modification:

- Air Construction and Title V Permit Application received on July 20, 2009.

- The Department's draft permit package including the Technical Evaluation and Preliminary Determination dated October 30, 2009 (PSD-FL-105D).

The following relevant documents and related correspondence are not a part of this permit modification, but helped form the basis for this permitting action or include important additional requirements applicable to the facility:

- Permit PSD-FL-105 issued by the Environmental Protection Agency (EPA) Region 4 office on May 17, 1987 that authorized construction of the facility.
- Amendment to Permit PSD-FL-105 issued by the Department on March 21, 1996 that allowed use of EPA Method 7E to measure emissions of nitrogen oxides (NO_X) as an alternative to EPA Method 7.
- Permit Modification PSD-FL-105A issued by the Department on May 22, 1997 that allowed the use of EPA Method 29 to measure emissions of mercury (Hg).
- Permit Modification PSD-FL-105B issued by the Department on September 28, 1999 to install a selective non-catalytic reduction system, revise permit conditions consistent with 40 CFR 60, Subpart Cb, permit metals recovery operations, and define the fuel slate for the facility.
- Permit Modification PSD-FL-105C issued by the Department on October 25, 2008 authorized the installation of the activated carbon injection system (ACI) for further Hg control. The ACI system for Hg control also enhances dioxin/furan (D/F) control.

2. APPLICABLE REGULATIONS

State Regulations

This facility emission units are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the F.A.C. The facility is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.

Chapter	Description
62-4	Permits
62-17	Electric Power Plant Siting
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources – General Requirements
62-212	Stationary Sources Preconstruction Review
62-213	Operation Permits for Major Sources of Air Pollution
62-296	Stationary Sources – Emissions Standards
62-297	Stationary Sources – Emissions Monitoring

Federal Regulations

The facility was or is subject to the applicable federal provisions regarding air quality as established by the EPA in the following sections of the Code of Federal Regulations (CFR). Federal Regulations are adopted in Rule 62-204.800, F.A.C.

Title 40, CFR	Description
Part 60	Subpart A Standards of Performance for New Stationary Sources – General Provisions. Subpart Cb Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors that are Constructed Before September 20, 1994. This Subpart was revised April 10, 2009.
Part 61	Subpart A Standards of Performance for National Emissions Standards Hazardous Air Pollutants (NESHAP) – General Provisions. Subpart C National Emission Standard for Beryllium.

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's PSD program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories as defined in 62-210.200, F.A.C., or
- 5 tons per year of lead.

PSD pollutants include: carbon monoxide (CO); nitrogen oxides (NOX); sulfur dioxide (SO2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM10); volatile organic compounds (VOC); lead (Pb); Fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H2S); total reduced sulfur (TRS), including H2S; reduced sulfur compounds, including H2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as nonmethane organic compounds (NMOC); and mercury (Hg).

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the "Significant Emission Rates" listed in definitions at Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

Permitting Requirements and non-PSD Applicability for this Project

No changes in permitted emissions, production or fuel use limitations for the three units are requested in the present modification request.

A PSD permit with a BACT determination was issued in 1987 by EPA for the Wheelabrator South Broward WTE Facility. Subsequent modifications were made by the Department to that permit primarily to clarify the fuel slate; to reflect more stringent standards and controls required following promulgation by EPA of 40 CFR 60, Subpart Cb; and to add the ACI control system to provide additional control of mercury emissions from each boiler.

The project is subject to Rule 62-4.080, F.A.C (Modification of Permit Conditions), which states:

(1) For good cause and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee the Department may grant additional time.
For the purpose of this section, good cause shall include, but not be limited to, any of the following:
(a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship.
(b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S.
(c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards.
(d) For discharges into State waters, a showing that new or changed classification of the water requires a modification of the discharge.
(e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance.
(2) A permittee may request a modification of a permit by applying to the Department.
(3) A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Department in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. For construction permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. For all other permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. A permit for which the permit application fee was prorated in accordance with paragraph 62-4.050(4)(l), F.A.C., shall not be shall not be extended. In no event shall a permit be extended or remain in effect longer than the time limits established by statute or rule.

Therefore, an air construction permit is required for the revision of the specific conditions and the Department will process the application as a modification to the original authority to construct, i.e. Permit PSD-FL-105 and the subsequent revision to it, PSD-FL-105B.

The key definition of "permit revision or permit modification" is given at Rule 62-210.200 (204), F.A.C. as follows:

"Any alteration to a permit term or condition except the Administrative Permit Correction described at Rule 62-210.360, F.A.C."

There will be no emission increases from Units 1, 2 and 3 caused by this project permit modification. Therefore, the project will not result in a significant net emission increase of a PSD pollutant and will not trigger a new PSD review and BACT determination.

3. EMISSIONS STANDARDS

No change in permitted emissions limits.

4. DRAFT PERMIT REQUIREMENTS

Wheelabrator has requested changes to the current Title V permit No. 0112119-011-AV and the air construction permit (AC) PSD-FL-105B. The changes to Subparts Cb, Db and Eb as currently stated in the Code of Federal Regulations (CFR) are listed below with the Department's responses. These changes are the basis for the requested permit modifications in the AC and the Title V revisions. These requests are being processed concurrently.

Wheelabrator's requests and the Department's responses are enumerated as follow:

The conditions in the PSD-FL-105B and its equivalent conditions in the current Title V permit, No. 0112119-011-AV, are revised (as applicable) as follows (~~strikethrough~~ for deletion and double underlined for additions).

0. *Wheelabrator Request*: Revise PSD-Fl-105b Specific Condition **1.d.(2)p** and Title V permit No. 0112119-011-AV Specific Condition **B.56** to authorize the annual mercury testing frequency.

   Department Response: The Department concurs with the applicant to change testing requirements from semi-annual to annual.

   These requirements is now in 40 CFR 60.58b (d)(2)(ix), Subpart Eb and reads: *" Following the date that the initial performance test for mercury is completed or is required to be completed under §60.8 of subpart A of this part, the owner or operator of an affected facility shall conduct a performance test for mercury emissions on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months from the previous performance test; and must complete five performance tests in each 5-year calendar period)."*

   PSD-Fl-105B Specific Condition **1.d. (2)p** and Title V Permit **B.56** are modified as follows:

   Mercury Testing – Method 29, Determination of Metals Emissions from Stationary Sources ~~(I) and (A)~~: Mercury emissions testing shall be conducted ~~semiannually~~ on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months from the previous performance test; and must complete five performance tests in each 5-year calendar period). Mercury stack tests shall be performed downstream of control devices or upstream and downstream of the control devices when determining compliance with the alternative removal requirement. [Rule 62-4.070 (3) F.A.C. and 40 CFR 60.38 (40 CFR 60.58b)]

1. *Wheelabrator Request*: Eliminate reference to Subpart E from permitting notes in Subsection B of Title V permit No. 0112109-011-AV. According to 40 CFR 60.50, any facility covered by Subpart Cb is not subject to Subpart E.

Department Response: The Department concurs with the applicant since the 40 CFR 60.32 (n) Subpart Cb now reads: "*Any affected facility meeting the applicability requirements under this section is not subject to subpart E of this part*". In addition, the reference to Subpart C, NESHAP for Beryllium is added since it was in the original PSD permit and is still applicable to the units.

Subsection B of the Title V permit is revised as follows:

{Permitting notes. These emissions units are regulated under NSPS - 40 CFR 60, Subpart Cb, Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors That Are Constructed on or Before September 20, 1994, adopted and incorporated by reference, subject to provisions, in Rule 62-204.800(8)(b), F.A.C.; ~~NSPS - 40 CFR 60, Subpart E, Standards of Performance for Incinerators, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.;~~ 40 CFR 61 Subpart C, NESHAP for Beryllium; Rule 62-212.400(5), F.A.C., Prevention of Significant Deterioration (PSD) (PSD-FL-105(B)); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT); Rule 62-296.401(2), F.A.C., Incinerators; Rule 62-296.416, F.A.C., Waste-to-Energy Facilities; and Power Plant Siting Certification No.: PA 85-21(B). Also, please note that conditions in 40 CFR 60, Subpart Cb, are contained in 40 CFR 60, Subpart Eb.}

2. *Wheelabrator Request*: Eliminate reference to Subpart E from specific condition **B.10** of Title V permit No. 0112109-011-AV.

   Department Response: The Department concurs with the applicant as stated in Response 1 above. The Department will add the reference to 40 CFR 61, Subpart C, NESHAP for Beryllium that was inadvertely deleted in the Title V permit.

   Title V Specific Condition **B.10.** is changed as follows:

   Applicable Requirements: These units are subject to all applicable requirements of 40 CFR 60 Subpart Cb, Emissions Control Guidelines and Compliance Schedules for Municipal Solid Waste Combustors; ~~Subpart E, NSPS for Incinerators;~~ 40 CFR 61, Subpart C NESHAP for Beryllium; and, Rule 62-296.416 F.A.C., Waste-to-Energy Facilities, except that where requirements in this permit are more restrictive, the requirements in this permit shall apply. [PSD-FL-105; 40 CFR 63 Subpart Cb and 40 CFR 61 Subpart C]

3. *Wheelabrator Request*: Eliminate reference to Subpart E and Subpart Db from specific condition **1.a.3** of PSD-FL-105B.

   Department Response: The Department concurs with the applicant as stated in Response 1 above and Response 4 below.

   PSD-FL-105B Specific Condition **1.a.(3)** is changed as follows:

   Applicable Requirements: These units are subject to all applicable requirements of 40 CFR 60 Subpart Cb, Emissions Control Guidelines and Compliance Schedules for Municipal Solid Waste Combustors; ~~Subpart E, NSPS for Incinerators;~~ ~~Subpart Db NSPS for Industrial-Commercial-Institutional Steam Generating Units~~; ~~Subpart Db NSPD for Industrial-Commercial-Institutional Steam Generating Units;~~ 40 CFR 61 Subpart C NESHAP for Beryllium; and, Rule 62-296.416 F.A.C., Waste-to-Energy Facilities, except that where requirements in this permit are more restrictive, the requirements in this permit shall apply. [PSD-FL-105; 40 CFR 63 Subpart Cb and 40 CFR 61 Subpart C]

4. *Wheelabrator Request*: Eliminate Specific Condition **No. 1.b**. of PSD-FL-105B, which is a Subpart Db requirement.

   Department Response: The Department concurs with the applicant regarding the elimination of references to Subpart Db. The applicability of 40 CFR 60, Subpart Db was revised as follows:

   Section 40 CFR 60.40b (h) now reads: *"Any affected facility that meets the applicability requirements and is subject to subpart Ea, subpart Eb, or subpart AAAA of this part is not covered by this subpart".*

   Section 40 CFR 60.40b (k) now reads: *"Any affected facility that meets the applicability requirements and is subject to an EPA approved State or Federal section 111(d)/129 plan implementing subpart Cb or subpart BBBB of this part is not covered by this subpart."*

   Therefore, applicable specific conditions will be modified accordingly.

   PSD-FL-105B Specific Condition **1.b.** is partially deleted and the first sentence is moved to Specific Condition **7. e**. as follows:

   Only distillate fuel oil or natural gas shall be used in the startup burners. ~~The annual capacity factor for use of natural gas and oil, as determined by 40 CFR 60 .43b shall be less than 10%. If the annual capacity factor of natural gas is greater that 10%, then the facility shall be subject to §60.44b.~~

   PSD-FL-105B Specific Condition **7.e.** is changed as follows:

   Auxiliary Burners Fuels: Only distillate fuel oil or natural gas shall be used in the startup burners. Natural gas may be used as fuel during warm-up, startup, shutdown, and malfunction periods, and at other times when necessary and consistent with good combustion practices. [Rule 62-04.070 (3) F.A.C]

   Title V Specific Condition **B.15.(6) a**. is changed as follows:

   Auxiliary Burners Fuels. Only distillate fuel oil or natural gas shall be used in the startup burners. Natural gas may be used as fuel during warm-up, startup, shutdown, and malfunction periods, and at other times when necessary and consistent with good combustion practices. ~~The annual capacity factor for use of natural gas and oil shall be less than 10%. The annual capacity factor for natural gas/distillate fuel oil is the ratio between the heat input to the unit from natural gas/distillate fuel oil during a calendar year and the potential heat input to the unit had it been operated for 8,760 hours during a calendar year at the maximum steady state design heat input capacity~~. [Rules 62-4.160(2), 62-210.200, 62-4.070(3), and 62-213.440(1), F.A.C.; and, PSD-FL-105(B) and (D)]

5. *Wheelabrator Request*: Eliminate Specific Condition No. **1.c (2)** of PSD-FL-105B and Title V Permit Specific Condition **B.109**, which is a Subpart E requirement.

   Department Response: The Department concurs with the applicant that Subpart E is not an applicable requirement as stated in Response 1 above. However, the Department will not delete this condition since it provides reasonable assurance that the charging rate is not exceeded. A reference to Subpart E is deleted. The applicant later withdrew this request, see comments and responses 9 and 10 below.

   PSD-FL-105B Specific Condition **1.c (2)** and Title V Permit Specific Condition **B. 109** is changed as follows:

Continuous Charging Rate Monitoring. The daily solid waste charging rate and hours of operation shall be determined and recorded for each MWC unit. The daily charging rate shall be determined each month on an average daily basis for each MWC unit using the Facility's truck scale weight data, refuse pit inventory and MWC operating data for the preceding calendar month. Monthly truck scale weight records on the weight of solid waste received and processed at the Facility and refuse pit inventory shall be used to determine the amount of solid waste charged during the preceding calendar month on an average daily basis. The MWC load level measurements or other operating data shall be used to determine the number of operating hours per MWC unit for each day during the preceding calendar month. [Rules 62-4.070 (3) and 62-213.440 F.A.C; 40 CFR 60.~~53 (a)~~ 58b(j); and, PSD-FL-105(B)]

6. *Weelabrator Request*: Eliminate Specific Condition No.**B.29** of Title V permit.

   Department Response: The Department concurs with the applicant since Wheelabrator has installed an activated carbon mercury control system. This condition will be deleted from the Title V permit.

   ~~Emissions Standards for Facilities Using Waste Separation. The Department recognizes that reduction of mercury emissions from waste-to-energy facilities may be achieved by implementation of mercury waste separation programs. Such programs would require removal of objects containing mercury from the waste stream before the waste is used as a fuel.~~
   ~~1. Facilities with sulfur dioxide and hydrogen chloride control equipment in place or under construction as of July 1, 1993, and which choose to control mercury emissions exclusively through the use of a waste separation program, shall submit a program plan to the Department by March 1, 1994, and shall comply with the following emissions limiting schedule.~~
   ~~a. After July 1, 1995, mercury emissions shall not exceed 140 micrograms per dry standard cubic meter of flue gas, corrected to 7 percent O_2.~~
   ~~b. After July 1, 1997, mercury emissions shall not exceed 70 micrograms per dry standard cubic meter of flue gas, corrected to 7 percent O_2.~~
   ~~2. Beginning no later than July 1, 1994, facilities subject to Rule 62-296.416(3)(b)1., F.A.C., shall perform semiannual individual emissions unit mercury emissions tests. Facilities shall stagger the semiannual testing of individual emissions units such that at least one test is performed quarterly. All tests conducted after July 1, 1995, shall be used to demonstrate compliance with the mercury emissions limiting standards of Rule 62-296.416(3)(b)1., F.A.C.~~
   ~~[Rule 62-296.416(3)(b), F.A.C.]~~

7. *Wheelabrator Request*: Remove references to "Mercury is controlled by source separation techniques pursuant to Rule 62-296.416, F.A.C." from Title V Specific Condition **B.7.d.**

   Department Response: The Department concurs with the applicant. Wheelabrator has already installed an activated carbon mercury control system.

   Title V Specific Condition **B.7.d.** is changed as follows:

   Air Pollution Control Equipment. The permittee shall have installed, shall continuously operate, and shall maintain the following air pollution controls to minimize emissions. Controls listed shall be fully operational upon startup of the equipment.
   a. Each boiler is equipped with a particulate emission control device for the control of particulates.

b. Each boiler is equipped with an acid gas control device designed to remove at least 90% of the acid gases.
c. Each boiler shall be equipped with a selective non-catalytic reduction system to control nitrogen oxides emissions.
d. Each boiler shall be equipped with an activated carbon injection system to further control mercury and dioxin/furan emissions. ~~Mercury is controlled by source separation techniques pursuant to Rule 62-296.416, F.A.C.~~

[PSD-FL-105(B), (C) and (D) ~~and Rule 62-296.416, F.A.C.~~]

8. *Wheelabrator Request*: Remove references to "Mercury is controlled by source separation techniques pursuant to Rule 62-296.416, F.A.C." from Specific Condition **No. 8.d.** of PSD-FL-105 (B) permit.

Department Response: The Department concurs with the applicant. Wheelabrator has already installed an activated carbon mercury control system.

PSD-FL-105B Specific Condition **8.d.** is changed as follows:

Air Pollution Control Equipment. The permittee shall have installed, shall continuously operate, and shall maintain the following air pollution controls to minimize emissions. Controls listed shall be fully operational upon startup of the equipment.
a. Each boiler is equipped with a particulate emission control device for the control of particulates.
b. Each boiler is equipped with an acid gas control device designed to remove at least 90% of the acid gases.
c. Each boiler shall be equipped with a selective non-catalytic reduction system to control nitrogen oxides emissions.
d. ~~Mercury is controlled by source separation techniques pursuant to Rule 62-296.416, F.A.C.~~ Each boiler shall be equipped with an activated carbon injection system to further control mercury and dioxin/furan emissions.

[PSD-FL-105 (C) and Rule 62-04.070 (3) F.A.C.]

9. *Wheelabrator Request*: Eliminate Specific Condition No. **B.109** , "Charging Rate Monitoring" from Permit No. 0112119-011-AV, which is a Subpart E requirements.

Department Response: On August 31, 2009, Wheelabrator withdrew this request.

10. *Wheelabrator Request*: Eliminate reference to Specific Condition No. **B.109** from Specific Condition **B.11** of Permit No. 01121019-011-AV.

Department Response: On August 31, 2009, Wheelabrator withdrew this request.

5. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Teresa Heron is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project

engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT REVISIONS

PERMITTEE

Wheelabrator South Broward, Inc.
4400 South State Road 7
Ft. Lauderdale, Florida 33314

Authorized Representative:
Jairaj Gosine, Plant Manager

DEP File No. PSD-FL-105D (0112119-013-AC)
South Broward Waste-to-Energy Facility
Municipal Waste Combustors, Units 1, 2 and 3
Modifications of Permit PSD-FL-105B
Expiration date: March 30, 2010
Broward County, Florida

PROJECT AND LOCATION

This is the final air construction permit, which revises Permit No. PSD-FL-105B. The project is to modify certain permit specific conditions to reflect updated rule applicability references to 40 CFR 60 Subparts Cb, Db and E for the three municipal waste combustors designated as Units 1, 2 and 3. Wheelabrator South Broward Waste-to-Energy Facility is categorized under Standard Industrial Classification No. 33314. The existing facility, Wheelabrator South Broward Waste-to-Energy Facility, is located in Broward County at 4400 South State Road 7 in Ft. Lauderdale. The UTM coordinates for this site are Zone 17; 579.54 kilometers (km) East and 2883.34 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions).

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

(DRAFT)

Joseph Kahn, Director (Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on _____(DRAFT)_____ to the persons listed below:

Mr. Jairaj Gosine, Wheelabrator, South Broward: jgosine@wm.com
Mr. Kennard F. Kosky, P.E., Golder & Associates: kkosky@golder.com
Mr. Joe Lurix, DEP Southeast District Office: joe.lurix@dep.state.fl.us
Ms. Daniella Banu, Broward County Local Air Program: dbanu@broward.org
Ms. Gracy Danois, U.S. EPA Region 4: danois.gracy@epa.gov
Ms. Ana Oquendo, US EPA Region 4: oquendo.ana@epa.gov
Ms. Kathleen Forney, U.S. EPA Region 4: forney.katy@epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for read file)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(DRAFT)

_____

(Clerk) (Date)

FACILITY DESCRIPTION

This facility consists of three municipal solid waste combustors (MWC); Units 1, 2 and 3 with auxiliary burners, lime storage and processing facilities, ash storage and processing facilities, a cooling tower, and ancillary support equipment. Each unit has a maximum capacity of 863 tons per day (TPD) of waste input. There is a metals recovery system which is a potential source of fugitive emissions. The nominal (generator nameplate) electric generating capacity of the facility is 67.6 megawatts (MW), which is sold to the local utility. The Title V permit includes the facility miscellaneous insignificant emissions units and/or activities.

Each unit includes an acid gas, air toxics, and particulate emissions control system consisting of a lime spray dryer absorber and fabric filter baghouse (SDA and FF). Nitrogen oxides are controlled by a urea injection system that operates under the principle of selective non-catalytic reduction (SNCR).

EMISSIONS UNITS

This facility consists of the following emissions units (EU) listed below.

E.U. ID No.	Brief Description
001	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 1
002	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 2
003	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 3
004	236 Ton Lime Silo with a Baghouse
005	Ash Handling System

PROJECT

Wheelabrator submitted an application for modification of its prevention of significant deterioration of air quality (PSD permit) originally issued by the U.S. Environmental Protection Agency (EPA). The requested permit modifications are to change some specific conditions of the PSD to reflect updated rule applicability references to 40 CFR 60 Subparts Cb, Db and E.

The proposed project modifications involve no changes in the previously permitted capacity limitations (charging rate monitoring, etc) compared with those in the Permit PSD-FL-105 and modifications thereto (PSD-105A, 105B, and 105C).

The proposed project does not trigger the PSD rules as a Major Stationary Source Modification or a determination of best available control technology (BACT).

The original Permit PSD-FL-105 required the SDA and FF. Permit Modification PSD-105A authorized the use of Method 29 for the testing of metals. Permit Modification PSD-105B authorized the SNCR system. Permit Modification PSD-FL-105C authorized the installation of the ACI system for further Hg control. The ACI system for Hg control would also enhance dioxin/furan (D/F) control.

REGULATORY CLASSIFICATION

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units (Units 1, 2 and 3) not subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

Siting: This facility is certified under the Florida Power Plant Siting Act (FPPSA), 403.501-518, F.S.

SECTION 2. PERMIT REVISIONS

The proposed project affects the following existing units:

E.U. ID No.	Brief Description
001	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 1
002	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 2
003	863 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 3

ADMINISTRATIVE REQUIREMENTS

1. Previous Permit Conditions: This permit modification, PSD-FL-105D, authorizes changes in selected conditions in the PSD-FL-105B and its equivalent conditions in the current Title V permit (0112119-011-AV). The revised Title V Permit is 0112119-014-AV. The original permit numeration is retained. The following conditions are modified as follows (~~strikethrough~~ for deletion and double underlined for additions).

SPECIFIC CONDITIONS OF PERMIT PSD-FL-105B

2. PSD-FL-105B Specific Condition **1.a.(3)** is modified as follows:

   Applicable Requirements: These units are subject to all applicable requirements of 40 CFR 60 Subpart Cb, Emissions Control Guidelines and Compliance Schedules for Municipal Solid Waste Combustors; ~~Subpart E, NSPS for Incinerators; Subpart Db NSPS for Industrial-Commercial-Institutional Steam Generating Units; Subpart Db NSPD for Industrial-Commercial-Institutional Steam Generating Units;~~ 40 CFR 61 Subpart C NESHAP for Beryllium; and, Rule 62-296.416 F.A.C., Waste-to-Energy Facilities, except that where requirements in this permit are more restrictive, the requirements in this permit shall apply. [PSD-FL-105; 40 CFR 63 Subpart Cb and 40 CFR 61 Subpart C]

3. PSD-FL-105B Specific Condition **1.b.** is partially deleted and the first sentence moved to Specific Condition **7.e** as follows:

   Only distillate fuel oil or natural gas shall be used in the startup burners. ~~The annual capacity factor for use of natural gas and oil, as determined by 40 CFR 60 .43b shall be less than 10%. If the annual capacity factor of natural gas is greater that 10%, then the facility shall be subject to §60.44b.~~

   PSD-FL-105B Specific Condition **7.e.** is modified as follows:

   Auxiliary Burners Fuels: Only distillate fuel oil or natural gas shall be used in the startup burners. Natural gas may be used as fuel during warm-up, startup, shutdown, and malfunction periods, and at other times when necessary and consistent with good combustion practices. [Rule 62-04.070 (3) F.A.C and PSD-FL-105 (B)]

4. PSD-FL-105B Specific Condition **1.c.(2)**. is modified as follows:

   Continuous Charging Rate Monitoring. The daily solid waste charging rate and hours of operation shall be determined and recorded for each MWC unit. The daily charging rate shall be determined each month on an average daily basis for each MWC unit using the Facility's truck scale weight data, refuse pit inventory and MWC operating data for the preceding calendar month. Monthly truck scale weight records on the weight of solid waste received and processed at the Facility and refuse pit inventory shall be used to determine the amount of solid waste charged during the preceding calendar month on an average daily basis. The MWC load level measurements or other operating data shall be used to determine the number of operating hours per MWC unit for each day during the preceding

calendar month. [Rules 62-204.800 (8)(b); 62-4.070 (3); 62-213.440 F.A.C., 40 CFR 60.~~53 (a)~~ 58b(j) and PSD-FL-105 (B)]]

5. PSD-Fl-105B Specific Condition **1.d.(2)p** is modified as follows:

Mercury Testing – Method 29, Determination of Metals Emissions from Stationary Sources ~~(I) and (A)~~: Mercury emissions testing shall be conducted ~~semiannually~~ on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months from the previous performance test; and must complete five performance tests in each 5-year calendar period). Mercury stack tests shall be performed downstream of control devices or upstream and downstream of the control devices when determining compliance with the alternative removal requirement. [Rule 62-4.070 (3) F.A.C. and 40 CFR 60.38 (40 CFR 60.58b)]

6. PSD-FL-105B Specific Condition **8.d.**

Air Pollution Control Equipment. The permittee shall have installed, shall continuously operate, and shall maintain the following air pollution controls to minimize emissions. Controls listed shall be fully operational upon startup of the equipment.

a. Each boiler is equipped with a particulate emission control device for the control of particulates.
b. Each boiler is equipped with an acid gas control device designed to remove at least 90% of the acid gases.
c. Each boiler shall be equipped with a selective non-catalytic reduction system to control nitrogen oxides emissions.
d. ~~Mercury is controlled by source separation techniques pursuant to Rule 62-296.416, F.A.C.~~ Each boiler shall be equipped with an activated carbon injection system to further control mercury and dioxin/furan emissions.

[PSD-FL-105 (B) and (C) and Rule 62-04.070 (3) ~~296.416~~, F.A.C.]

Friday, Barbara

To:	jgosine@wm.com
Cc:	'KKosky@Golder.com'; Lurix, Joe; 'dbanu@co.broward.fl.us'; 'Gracy Danois'; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Heron, Teresa; Holtom, Jonathan
Subject:	WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV
Attachments:	0112119013014SignedCombineWrittenNoticeRenewal.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0112119.014.AV.D_pdf.zip

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0112119.013.AC.D_pdf.zip

Attention: Teresa Heron

Owner/Company Name: WHEELABRATOR SOUTH BROWARD, INC
Facility Name: WHEELABRATOR SOUTH BROWARD
Project Number: 0112119-014-AV
Permit Status: DRAFT/PROPOSED
Permit Activity: PERMIT REVISION
Facility County: BROWARD

"The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at http://www.dep.state.fl.us/air/emission/apds/default.asp ."

Permit project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation.

Barbara Friday
Bureau of Air Regulation

Friday, Barbara

From: Gosine, Jairaj [jgosine@WM.com]
To: Friday, Barbara
Sent: Thursday, October 29, 2009 11:16 AM
Subject: Read: WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV

Your message

To: jgosine@WM.com
Subject:

was read on 10/29/2009 11:16 AM.

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mx3.golder.com]
Sent: Thursday, October 29, 2009 10:57 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mx3.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<KKosky@Golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent
4AE9AD19_5361_41697_2 907271798087

Friday, Barbara

From: Exchange Administrator
Sent: Thursday, October 29, 2009 10:55 AM
To: Friday, Barbara
Subject: Delivery Status Notification (Relay)
Attachments: ATT308946.txt; WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

dbanu@co.broward.fl.us

Friday, Barbara

From: System Administrator
To: Lurix, Joe; Holtom, Jonathan
Sent: Thursday, October 29, 2009 10:55 AM
Subject: Delivered:WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV

Your message

To: jgosine@wm.com
Cc: 'KKosky@Golder.com'; Lurix, Joe; 'dbanu@co.broward.fl.us'; Gracy Danois; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Heron, Teresa; Holtom, Jonathan
Subject: WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV
Sent: 10/29/2009 10:55 AM

was delivered to the following recipient(s):

Lurix, Joe on 10/29/2009 10:55 AM
Holtom, Jonathan on 10/29/2009 10:55 AM

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Thursday, October 29, 2009 10:55 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<danois.gracy@epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4AE9ACCC_28169_69572_1 7129F25400A

Friday, Barbara

From: Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]
Sent: Thursday, October 29, 2009 10:55 AM
To: Friday, Barbara
Subject: Successful Mail Delivery Report
Attachments: Delivery report; Message Headers

This is the mail system at host mseive02.rtp.epa.gov.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<Forney.Kathleen@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4AE9ACCC_24922_18013_1 5E91825400D

<Oquendo.Ana@epamail.epa.gov>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent 4AE9ACCC_24922_18013_1 5E91825400D

Friday, Barbara

From: System Administrator
To: Gibson, Victoria; Heron, Teresa
Sent: Thursday, October 29, 2009 10:55 AM
Subject: Delivered:WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV

Your message

To: jgosine@wm.com
Cc: 'KKosky@Golder.com'; Lurix, Joe; 'dbanu@co.broward.fl.us'; Gracy Danois; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Heron, Teresa; Holtom, Jonathan
Subject: WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV
Sent: 10/29/2009 10:55 AM

was delivered to the following recipient(s):

Gibson, Victoria on 10/29/2009 10:55 AM
Heron, Teresa on 10/29/2009 10:55 AM

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Thursday, October 29, 2009 10:56 AM
Subject: Read: WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV

Your message

To: jgosine@wm.com
Cc: 'KKosky@Golder.com'; Lurix, Joe; 'dbanu@co.broward.fl.us'; Gracy Danois; Oquendo.Ana@epamail.epa.gov; Forney.Kathleen@epamail.epa.gov; Gibson, Victoria; Heron, Teresa; Holtom, Jonathan
Subject: WHEELABRATOR SOUTH BROWARD, INC. - SOUTH BROWARD WASTE-TO-ENERGY FACILITY; 0112119-014-AV
Sent: 10/29/2009 10:55 AM

was read on 10/29/2009 10:56 AM.

Scanning request from **Elizabeth Walker**

Priority: ☑-ASAP ☐-Place in Normal Scanning Queue

Facility ID	Project#	Type	PSD #	Return to:
0112119	013	AC	105D	**Sylvia**
0112119	014	AV		

	Document Type	Date	Next Step:
1	Application	7/20/09	☑ Send*
	Correspondence	/ /	☐ See Ewok
	Intent	/ /	☑ Create File Folder for AC
	Final Permit	/ /	☐ File in PSD Rm
	Amendment	/ /	☑ File in Act. Proj
	OGC	/ /	

Notes:

* ☑-EPA ☑-NPS ☐-GA ☑-Forest Svc ☐-Other
☑-District/Local ☑-Processor

TERESA
BARBARA
Elizabeth

Batch ID: 0112119-014-AV

Document Date: 7-20-2009

Page Count: 61

Scanned by: JK

Date Scanned: JUL 21 2009

Batch ID: 0112119-013-AC

PSD: 1051

Document Date: 7-20-09

Page Count: 61

Scanned by: JK

Date Scanned: JUL 21 2009

AIR CONSTRUCTION PERMIT APPLICATION

WHEELABRATOR SOUTH BROWARD, INC.
BROWARD COUNTY, FLORIDA

Prepared For:

Wheelabrator South Broward, Inc.
4400 South State Road 7
Ft. Lauderdale, Florida 33314

Prepared By:

Golder Associates Inc.
6026 NW 1st Place
Gainesville, Florida 32607

July 2009

0938-7577

DISTRIBUTION:
4 Copies – FDEP
2 Copies – Wheelabrator South Broward, Inc.
1 Copy – Golder Associates Inc.

Wheelabrator South Broward Inc.
A Waste Management Company
4400 South State Road 7
Ft. Lauderdale, FL 33314
(954) 581-6606
(954) 581-6705 Fax

July 14, 2009 Certified Mail 70072680000087713387

Florida Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Attention: Trinia L. Vielhauer, Chief

Re: Wheelabrator South Broward
Application for Revised PSD and Title V Permits
Project No.: 0112119-013-AC
0112119-014-AV

Dear Ms. Vielhaur:

Please find enclosed four copies of Wheelabrator South Broward's application to revise the facility's PSD and Title V permits, primarily to remove or modify conditions referencing semi-annual mercury testing, which are no longer applicable with the recent installation of the facility's activated carbon system. Additional permit modification requests are also listed in Part B of the application.

I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this submittal. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements and information in this document are true, accurate and complete.

If there are any questions, or if further information is required, please contact this office at (954) 581-6606.

Sincerely,

Jairaj Gosine
Plant Manager

cc: Chuck Faller (with attachments)
Tim Porter (with attachments)
Rob French – MPI (without attachments)
Ram Tewari – BCWRS (without attachments)

WM WASTE MANAGEMENT

APPLICATION FOR AIR PERMIT

LONG FORM

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

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.

RECEIVED
JUN 20 2009
BUREAU OF AIR REGULATION

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **Wheelabrator South Broward, Inc.**	
2. Site Name: **Wheelabrator South Broward**	
3. Facility Identification Number: **0112119**	
4. Facility Location... Street Address or Other Locator: **4400 South State Road 7** City: **Ft. Lauderdale** County: **Broward** Zip Code: **33314**	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **Jairaj Gosine, Plant Manager**
2. Application Contact Mailing Address... Organization/Firm: **Wheelabrator South Broward, Inc.** Street Address: **4400 South State Road 7** City: **Ft. Lauderdale** State: **FL** Zip Code: **33314**
3. Application Contact Telephone Numbers... Telephone: **(954) 581-6606** ext. Fax: **(954) 581-6705**
4. Application Contact E-mail Address: **jgosine@wm.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 1-20-09	3. PSD Number (if applicable):
2. Project Number(s): 0112119-013-AC 0112119-014-AV	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

This application is to request a revision to the mercury emissions testing frequency of the municipal solid waste combustor units 1, 2, and 3 from semi-annual to annual based on the revised New Source Performance Standards (NSPS) for large municipal solid waste combustors (40 CFR 60 Subparts Cb and Eb). The current semiannual testing frequency is described in Specific Condition 1.d.(2)p of the construction permit PSD-FL-105(B) and Specific Condition B.56 of the final revised Title V air operating permit No. 0112119-011-AV. Additional changes to the permit conditions have been requested in Part B, which are based on recent regulatory changes and installation of the activated carbon mercury control system.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
001	863 TPD MSW Combustor & Auxiliary Burners – Unit 1	AC1F	N/A
002	863 TPD MSW Combustor & Auxiliary Burners – Unit 2	AC1F	N/A
003	863 TPD MSW Combustor & Auxiliary Burners – Unit 3	AC1F	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, 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.* _____ _____ 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:
   Jairaj Gosine, Plant Manager

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   ☒ 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.

   ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   ☐ The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: **Wheelabrator South Broward, Inc.**
   Street Address: **4400 South State Road 7**
   City: **Ft. Lauderdale** State: **FL** Zip Code: **33314**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(954) 581-6606** ext. Fax: **(954) 581-6705**

5. Application Responsible Official E-mail Address: **jgosine@wm.com**

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

7/14/09
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: **kkosky@golder.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(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

(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.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, 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.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, 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 ☐, 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.

(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 ☐, 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.

Signature (seal) 7/7/09 Date

* Attach any exception to certification statement.
**Board of Professional Engineers Certificate of Authorization #00001670.

STATE OF FLORIDA PROFESSIONAL ENGINEER

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **17** East (km) **579.54** North (km) **2883.34**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) **26 / 04 / 08** Longitude (DD/MM/SS) **80 / 12 / 13**	
3. Governmental Facility Code: **0**	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: **Jairaj Gosine, Plant Manager**
2. Facility Contact Mailing Address... Organization/Firm: **Wheelabrator South Broward, Inc.** Street Address: **4400 South State Road 7** City: **Ft. Lauderdale** State: **FL** Zip Code: **33314**
3. Facility Contact Telephone Numbers: Telephone: **(954) 581-6606** ext. Fax: **(954) 581-6705**
4. Facility Contact E-mail Address: **jgosine@wm.com**

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. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☒ Title V Source	
4. ☒ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☒ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☒ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☐ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: **40 CFR 60, Subpart Cb.**	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Particulate Matter Total – PM	A	N
Particulate Matter – PM10	A	N
Sulfur Dioxide – SO2	A	N
Nitrogen Oxides – NOx	A	N
Carbon Monoxide – CO	A	N
Fluoride – FL	A	N
Lead – Pb	B	N
Beryllium – H021	B	N
Cadmium – H027	B	N
Hydrogen Chloride – H106	A	N
Mercury – H114	B	N
Dioxin/Furan – DIOX	B	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

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) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: **Sep. 2008**
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) ☐ Attached, Document ID:_____ ☒ Previously Submitted, Date: **Sep. 2008**
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) ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: ☐ Attached, Document ID:_____ ☒ Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): ☒ Attached, Document ID: **Part B**
3. Rule Applicability Analysis: ☒ Attached, Document ID: **Part B**
4. List of Exempt Emissions Units: ☐ Attached, Document ID:_____ ☒ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: ☐ Attached, Document ID:_____ ☒ Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): ☐ Attached, Document ID:_____ ☒ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): ☐ Attached, Document ID:_____ ☒ 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:_____
   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

1. Acid Rain Program Forms:

   Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not an Acid Rain source)

   Phase II NO_X Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

   New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☒ Not Applicable (not a Hg Budget unit)

Additional Requirements Comment

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]
MSW Combustor & Auxiliary Burners: Units 1, 2, and 3

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:

   Three (3) 863-ton per day (TPD) Municipal Solid Waste (MSW) Combustors & Auxiliary Burners
3. Emissions Unit Identification Number: **001, 002, and 003**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:
A		**04/1991**	**49**

8. Federal Program Applicability: (Check all that apply)
   - ☐ Acid Rain Unit
   - ☐ CAIR Unit
   - ☐ Hg Budget Unit
9. Package Unit:
   Manufacturer: **Babcock and Wilcox** Model Number:
10. Generator Nameplate Rating: **66.086** MW
11. Emissions Unit Comment:

    Generator nameplate rating of 66.086 MW is the facility total. All three units share a common stack containing one flue for each unit.

Emissions Unit Control Equipment/Method: Control 1 of 5

1. Control Equipment/Method Description: **Spray Dryer Absorber**
2. Control Device or Method Code: **202**

Emissions Unit Control Equipment/Method: Control 2 of 5

1. Control Equipment/Method Description: **Fabric Filter High Temperature [T > 250 degrees Fahrenheit (°F)]**
2. Control Device or Method Code: **016**

Emissions Unit Control Equipment/Method: Control 3 of 5

1. Control Equipment/Method Description: **Selective Non-Catalytic Reduction for NO_x control**
2. Control Device or Method Code: **107**

Emissions Unit Control Equipment/Method: Control 4 of 5

1. Control Equipment/Method Description: **Control of Percent Oxygen (O_2) in Combustion Air for CO control (Good Combustion Control)**
2. Control Device or Method Code: **033**

Emissions Unit Control Equipment/Method: Control 5 of 5

1. Control Equipment/Method Description: **Carbon Injection for Hg control**
2. Control Device or Method Code: **207**

B. EMISSIONS UNIT CAPACITY INFORMATION
(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **863 TPD MSW (Monthly Average)**	
2. Maximum Production Rate: **192,000 lb/hr steam (4-hour block average)**	
3. Maximum Heat Input Rate: **323.6** million Btu/hr	
4. Maximum Incineration Rate: pounds/hr **863** tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8,760** hours/year
6. Operating Capacity/Schedule Comment:	

All values are per MSW unit. MSW heat content is assumed to be 4,500 Btu/lb. See Condition B.11 in Permit No. 0112119-011-AV.

Maximum heat input rate and maximum incineration rates based on monthly average.

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: **Boiler Nos. 1, 2, and 3**	2. Emission Point Type Code: **1**	
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: **195** feet	7. Exit Diameter: **7.5** Feet
8. Exit Temperature: **300**°F	9. Actual Volumetric Flow Rate: **169,000** acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: **80,000** dscfm	12. Nonstack Emission Point Height: Feet	
13. Emission Point UTM Coordinates... Zone: **17** East (km): **579.54** North (km): **2883.34**	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) **26 / 04 / 08** Longitude (DD/MM/SS) **80 / 12 / 13**	
15. Emission Point Comment: **There is one common stack containing one flue for each of the three MSW combustors. Stack parameters are average values for each flue. Stack parameters based on Title V permit application dated April 2005.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): **Natural Gas Combustion**		
2. Source Classification Code (SCC): **1-01-006-01**	3. SCC Units: **Million Cubic Feet Natural Gas Burned**	
4. Maximum Hourly Rate: **0.93**	5. Maximum Annual Rate: **814.6**	6. Estimated Annual Activity Factor: **10%**
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1,044**
10. Segment Comment: **Fuel used for auxiliary burners. Used as fuel during warm-up, startup, shutdown, and malfunctions, as well as other times when necessary and consistent with good combustion practice. Maximum hourly firing rate based on 323.6 MMBtu/hr heat input per unit. Maximum annual firing rate based on annual activity factor of 10% operation during the year (876 hr/yr).**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): **MSW Combustion**		
2. Source Classification Code (SCC): **1-01-012-01**	3. SCC Units: **Tons Solid Waste Burned**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate: **314,995**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: **0.2**	8. Maximum % Ash: **30**	9. Million Btu per SCC Unit: **9**
10. Segment Comment: **MSW throughput limited to 863 TPD per unit (2,589 TPD total), and 323.6 MMBtu/hr as determined on a monthly average. Maximum annual rate based on one unit firing at 863 TPD and operating for 365 days/yr.**		

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	033		EL
DIOX	202	016	EL
FL	202	016	EL
H021 – Beryllium	202	016	EL
H027 – Cadmium	202	016	EL
H106 – Hydrogen Chloride	202		EL
H114 – Mercury	207	202, 016	EL
NOx	107		EL
Pb	202	016	EL
PM	202	016	EL
PM10	202	016	EL
SO2	202		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: **33.9** lb/hour **148.5** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **100 ppmvd @ 7-percent O_2 (per MSW combustor unit)** Reference: **Permit No. 0112119-011-AV**	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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Emissions per MSW combustor unit.**	
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: **100 ppmvd @ 7% O_2**	4. Equivalent Allowable Emissions: **33.9** lb/hour **148.5** tons/year
5. Method of Compliance: **CEMS – 4-hour Block Average**	
6. Allowable Emissions Comment (Description of Operating Method): **40 CFR 60.34b(a) and PSD-FL-105(B).** **Emissions per MSW combustor unit.**	

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: **DIOX**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **8.7×10^{-6}** lb/hour **3.8×10^{-5}** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **30 ng/dscm @ 7-percent O_2 (per MSW combustor unit)** Reference: **Permit No. 0112119-011-AV**	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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Emissions per MSW combustor unit.**	
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: **30 ng/dscm @ 7-percent O_2**	4. Equivalent Allowable Emissions: **8.7×10^{-6}** lb/hour **3.8×10^{-5}** tons/year
5. Method of Compliance: **EPA Method 23. Test at least once annually [40 CFR 60.38b(b)]. Testing once every 3 years if test results < 15 ng/dscm.**	
6. Allowable Emissions Comment (Description of Operating Method): **40 CFR 60.33b(c)(1)(ii) and PSD-FL-105(B). Emissions per MSW combustor unit.**	

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: **FL**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **1.29** lb/hour **5.66** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.0040 lb/MMBtu (per MSW combustor unit)** Reference: **Permit No. 0112119-011-AV**	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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Emissions per MSW combustor unit.**	
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: **0.0040 lb/MMBtu**	4. Equivalent Allowable Emissions: **1.29** lb/hour **5.66** tons/year
5. Method of Compliance: **EPA Method 13A, 13B, or modified Method 5 for fluorides. Every 5 years.**	
6. Allowable Emissions Comment (Description of Operating Method): **PSD-FL-105(B). Emissions per MSW combustor unit.**	

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: **Beryllium – H021**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.0003** lb/hour **0.0013** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.001 mg/dscm @ 7-percent O_2 (per MSW combustor unit)** Reference: **Permit No. 0112119-011-AV**	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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Emissions per MSW combustor unit.**	
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: **0.001 mg/dscm @ 7-percent O_2**	4. Equivalent Allowable Emissions: **0.0003** lb/hour **0.0013** tons/year
5. Method of Compliance: **EPA Method 29, annually**	
6. Allowable Emissions Comment (Description of Operating Method): **PSD-FL-105(B).** **Emissions per MSW combustor unit.**	

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: **Cadmium – H027**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.011** lb/hour **0.046** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.035 mg/dscm @ 7-percent O_2 (per MSW combustor unit)** Reference: **40 CFR 60, Subpart Cb**	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: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Emissions per MSW combustor unit.

Hourly: **0.035 mg/dscm x 80,000 dscf/min x 60 min/hr x 1 m^3/35.3 ft^3 x 1 lb/453.6 g x 1 g/1000 mg = 0.0105 lb/hr**

Annual: **0.0105 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 0.046 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: **0.035 mg/dscm @ 7-percent O_2**	4. Equivalent Allowable Emissions: **0.011** lb/hour **0.046** tons/year
5. Method of Compliance: **EPA Method 29, annually**	
6. Allowable Emissions Comment (Description of Operating Method): **40 CFR 60, Subpart Cb. Emissions per MSW combustor unit.**	

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: **Hydrogen Chloride – H106**	2. Total Percent Efficiency of Control: **95**
3. Potential Emissions: **12.6** lb/hour **55** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **29 ppmvd @ 7-percent O_2 (per MSW combustor unit)** Reference: **Permit No. 0112119-011-AV**	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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Emissions per MSW combustor unit.**	
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: **29 ppmvd @ 7-percent O_2**	4. Equivalent Allowable Emissions: **12.6** lb/hour **55** tons/year
5. Method of Compliance: **EPA Method 26, 26A; annually**	
6. Allowable Emissions Comment (Description of Operating Method): **29 ppmvd @ 7-percent O_2 or 95-percent reduction by weight or volume, whichever is less stringent. Emissions per MSW combustor unit.**	

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: **Mercury – H114**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.015** lb/hour **0.066** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.050 mg/dscm @ 7-percent O_2 (per MSW combustor unit)** Reference: **40 CFR 60, Subpart Cb**	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: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Emissions per MSW combustor unit.

Hourly: **0.050 mg/dscm x 80,000 dscf/min x 60 min/hr x 1 m^3/35.3 ft^3 x 1 lb/453.6 g x 1 g/1000 mg = 0.015 lb/hr**

Annual: **0.015 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 0.066 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: **0.050 mg/dscm @ 7-percent O_2**	4. Equivalent Allowable Emissions: **0.015** lb/hour **0.066** tons/year
5. Method of Compliance: **EPA Method 29, annually**	
6. Allowable Emissions Comment (Description of Operating Method): **0.050 mg/dscm @ 7-percent O_2 or 85-percent reduction by weight or volume, whichever is less stringent. 40 CFR 60, Subpart Cb. Emissions per MSW combustor unit.**	

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: **114** lb/hour **499** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **205 ppmvd @ 7-percent O_2 (per MSW combustor unit)** Reference: **Permit No. 0112119-011-AV**	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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Emissions per MSW combustion unit.**	
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: **205 ppmvd @ 7-percent O_2**	4. Equivalent Allowable Emissions: **114** lb/hour **499** tons/year
5. Method of Compliance: **CEMS 24-hour daily arithmetic average.**	
6. Allowable Emissions Comment (Description of Operating Method): **40 CFR 60.33b(d) and PSD-FL-105(B). Emissions per MSW combustor unit.**	

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: **Pb**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.120** lb/hour **0.53** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **0.40 mg/dscm @ 7-percent O_2 (per MSW combustor unit)** Reference: **40 CFR 60, Subpart Cb**	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: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Emissions per MSW combustor unit.

Hourly: **0.40 mg/dscm x 80,000 dscf/min x 60 min/hr x 1 m^3/35.3 ft^3 x 1 lb/453.6 g x 1 g/1000 mg = 0.120 lb/hr**

Annual: **0.120 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 0.525 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: **OTHER**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **0.40 mg/dscm @ 7-percent O_2**	4. Equivalent Allowable Emissions: **0.120** lb/hour **0.53** tons/year
5. Method of Compliance: **EPA Method 29 or 12, annually**	
6. Allowable Emissions Comment (Description of Operating Method): **0.40 mg/dscm @ 7-percent O_2 or 85-percent reduction by weight or volume, whichever is less stringent. 40 CFR 60, Subpart Cb. Emissions per MSW combustor unit.**	

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: **99+**
3. Potential Emissions: **7.49** lb/hour **32.8** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **25 mg/dscm @ 7-percent O_2 (per MSW combustor unit)** Reference: **40 CFR 60, Subpart Cb**	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: ☐ 5 years ☐ 10 years

10. Calculation of Emissions:

Emissions per MSW combustor unit.

Hourly: **25 mg/dscm x 80,000 dscf/min x 60 min/hr x 1 m^3/35.3 ft^3 x 1 lb/453.6 g x 1 g/1000 mg = 7.49 lb/hr**

Annual: **7.49 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 32.8 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: **25 mg/dscm @ 7-percent O_2**	4. Equivalent Allowable Emissions: **7.49** lb/hour **32.8** tons/year
5. Method of Compliance: **EPA Method 5; annually**	
6. Allowable Emissions Comment (Description of Operating Method): **40 CFR 60, Subpart Cb.** **Emissions per MSW combustor unit.**	

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: **75**
3. Potential Emissions: **35.1** lb/hour **153.7** tons/year	4. Synthetically Limited? ☐ Yes ☒ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **29 ppmvd @ 7-percent O_2 (per MSW combustor unit)** Reference: **Permit No. 0112119-011-AV**	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: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Emissions per MSW combustor unit.**	
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: **29 ppmvd @ 7-percent O_2**	4. Equivalent Allowable Emissions: **35.1** lb/hour **153.7** tons/year
5. Method of Compliance: **CEMS 24-hour block daily geometric mean.**	
6. Allowable Emissions Comment (Description of Operating Method): **29 ppmvd @ 7-percent O_2 or 75-percent reduction by weight or volume, whichever is less stringent.**	

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):	

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: **VE10**	2. Basis for Allowable Opacity: ☒ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: **10** % Exceptional Conditions: **100** % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment: **Exceptional Conditions: Periods of startup, shutdown, and malfunction. Duration of startup or shutdown periods are limited to 3 hours per occurrence, except as provided in 40 CFR 60.33b(a)(1)(iii).**	

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

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

Continuous Monitoring System: Continuous Monitor 1 of 7

1. Parameter Code: **O2 – Oxygen**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: **SICK** Model Number: **MCS-100EHW**	Serial Number: **278, 277, and 279**
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Used with SO_2, NO_x, and CO monitors** **MSW Combustor Unit 1 – Serial Number 278** **MSW Combustor Unit 2 – Serial Number 277** **MSW Combustor Unit 3 – Serial Number 279**	

Continuous Monitoring System: Continuous Monitor 2 of 7

1. Parameter Code: **EM – Emission**	2. Pollutant(s): **SO2**
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: **SICK** Model Number: **MCS-100EHW**	Serial Number: **278, 277, and 279**
5. Installation Date: **02/01/2001**	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Used with SO_2, NO_x, and CO monitors** **MSW Combustor Unit 1 – Serial Number 278** **MSW Combustor Unit 2 – Serial Number 277** **MSW Combustor Unit 3 – Serial Number 279**	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor 3 of 7

1. Parameter Code: **EM – Emission**	2. Pollutant(s): **NOx**
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: **SICK** Model Number: **MCS-100E**	Serial Number: **278, 277, and 279**
5. Installation Date: **02/01/2001**	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Used with SO_2, NO_x, and CO monitors** **MSW Combustor Unit 1 – Serial Number 278** **MSW Combustor Unit 2 – Serial Number 277** **MSW Combustor Unit 3 – Serial Number 279**	

Continuous Monitoring System: Continuous Monitor 4 of 7

1. Parameter Code: **EM – Emission**	2. Pollutant(s): **CO**
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: **SICK** Model Number: **MCS-100E**	Serial Number: **278, 277, and 279**
5. Installation Date: **02/01/2001**	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Used with SO_2, NO_x, and CO monitors** **MSW Combustor Unit 1 – Serial Number 278** **MSW Combustor Unit 2 – Serial Number 277** **MSW Combustor Unit 3 – Serial Number 279**	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

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

Continuous Monitoring System: Continuous Monitor **5** of **7**

1. Parameter Code: **VE – Visible Emissions (opacity)**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information... Manufacturer: **LAND INSTRUMENTAL INC.** Model Number: **4500 MKII**	Serial Number: **See Comment**
5. Installation Date: **07/21/2003**	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **MSW Combustor Unit 1 – Serial Number 0295809** **MSW Combustor Unit 2 – Serial Number 0295813** **MSW Combustor Unit 3 – Serial Number 0295815**	

Continuous Monitoring System: Continuous Monitor **6** of **7**

1. Parameter Code: **TEMP**	2. Pollutant(s):
3. CMS Requirement:	☒ Rule ☐ Other
4. Monitor Information... Manufacturer: **See Comment** Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **40 CFR 60, Subpart Cb, Monitor manufacturer and model number may vary for maintenance purposes.**	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor 7 of 7

1. Parameter Code: **FLOW – Steam Flow**	2. Pollutant(s):
3. CMS Requirement:	☒ Rule ☐ Other
4. Monitor Information... Manufacturer: **See Comment** Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **40 CFR 60, Subpart Cb; Monitor manufacturer and model number may vary for maintenance purposes.**	

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

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)
   ☐ Attached, Document ID: _____ ☒ Previously Submitted, Date **Sep. 2008**

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)
   ☐ Attached, Document ID: _____ ☐ 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)
   ☐ Attached, Document ID _____ ☒ Previously Submitted, Date **Sep. 2008**

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)
   ☐ Attached, Document ID: _____ ☒ Previously Submitted, Date **Sep. 2008**
   ☐ 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)
   ☐ Attached, Document ID: _____ ☒ Previously Submitted, Date **Sep. 2008**
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☐ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ Previously Submitted, Date: _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   _____
   ☒ 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:
   ☐ Attached, Document ID: _____ ☒ Not Applicable

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)): ☐ Attached, Document ID: _____ ☒ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☒ Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☒ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: ☐ Attached, Document ID: _____
2. Compliance Assurance Monitoring: ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements Comment

PART B

PART B

APPLICATION FOR AIR CONSTRUCTION PERMIT FOR THE REVISION OF MERCURY EMISSION TEST FREQUENCY FOR MSW COMBUSTOR UNITS 1, 2, AND 3 (EU IDS 001, 002, AND 003)

Introduction

Wheelabrator South Broward, Inc. (Wheelabrator) is seeking authorization from the Florida Department of Environmental Protection (FDEP) to revise the current mercury emissions testing frequency in FDEP Permit Nos. PSD-FL-105(B) and 0112119-011-AV for the municipal solid waste (MSW) combustors, Unit Nos. 1, 2, and 3 at the South Broward Waste-to-Energy facility. Mercury emissions testing must be conducted semiannually based on specific condition 1.d.(2)p of Permit No. PSD-FL-105(B) and specific condition B.56 of Permit No. 0112119-011-AV. Wheelabrator is seeking authorization to revise the mercury testing frequency from semiannually to annually.

Emissions from the three MSW combustors are controlled by fabric filter baghouses and lime spray dryer absorbers. Mercury emissions are reduced by pre-combustion waste separation. Carbon monoxide (CO) emissions are controlled by good combustion practices. The three MSW combustors have been retrofitted with Selective Non-Catalytic Reduction (SNCR) nitrogen oxides (NO_x) controls in order to comply with the requirements in Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60), Subpart Cb, *Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors that are Constructed on or Before September 20, 1994.*

Wheelabrator has recently received a construction permit (Permit No. 0112119-010-AC/PSD-FL-105C) to equip each Unit with an activated carbon injection system to further control mercury emissions. The activated carbon injection systems and associated equipment have been installed and the first performance test was conducted on March 18, 2009. A final revised Title V air operating Permit No. 0112119-011-AV was issued on February 25, 2009 to operate the activated carbon injection systems.

According to specific condition B.56 of the final Title V Permit No. 0112119-011-AV, Wheelabrator is required to conduct mercury emissions testing semiannually. However, according to 40 CFR 60, Subparts Cb and Eb [40 CFR 60.58b(d)], mercury emissions testing is required to be conducted on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months from the previous performance test; and must complete five performance tests in each 5-year calendar period). This requirement has also been presented in specific condition B.54.(2) (Test Methods and

Procedures for Cadmium, Lead and Mercury) of Permit No. 0112119-011-AV. Therefore, Wheelabrator requests removal of Specific Condition B.56 or revision to annual testing.

Golder Associates Inc. (Golder) was contracted to prepare the necessary air permit application to request revision of the mercury emissions testing frequency for Units 1, 2, and 3. The air permit application consists of the appropriate application forms [Part I; DEP Form 62-210.900(1)], a description of the project, and the initial mercury emissions test results. There are no changes to the application form submitted in September 2008 except the mercury emissions testing frequency.

Initial Performance Test of the Activated Carbon Injection System

Wheelabrator has completed installing the activated carbon injection systems per Construction Permit No. PSD-FL-105C and has conducted the initial performance test. The results of the performance test are summarized below:

	Inlet Mercury Concentration (µg/dscm @ 7% O_2)	Outlet Mercury Concentration (µg/dscm @ 7% O_2)	Mercury Removal Efficiency (%)	Mercury Emission Limit in Permit (µg/dscm @ 7% O_2)
Unit 1	68	2.3	97%	50
Unit 2	38	4.3	88%	50
Unit 3	52	4.1	92%	50

A summary of test results is presented in Appendix A.

Proposed Changes

Wheelabrator is proposing changes to the construction permit PSD-FL-105(B) and final revised Title V Permit No. 0112119-011-AV to authorize the annual mercury testing frequency. Specific Condition 1.d.(2)p of Permit No. PSD-FL-105(B) and Specific Condition B.56 of the final revised Title V Permit 0112119-011-AV currently say:

> *Mercury emissions testing shall be conducted semiannually. Mercury stack tests shall be performed downstream of control devices or upstream and downstream of the control devices when determining compliance with the alternative removal requirement. [PSD-FL-105(B)]*

Wheelabrator is proposing eliminating Condition B.56 from Permit No. 0112119-011-AV. Wheelabrator is also proposing revising the language in Specific Condition 1.d.(2)p of Permit No. PSD-FL-105(B) as follows:

> *Mercury emissions testing shall be conducted on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months from the previous performance test; and must complete five performance tests in each 5-year calendar period). Mercury stack tests shall be performed downstream of control devices or upstream and downstream of the control devices when determining compliance with the alternative removal requirement.*

Wheelabrator is also proposing revisions/deletion of several permit conditions based on recent regulatory changes and installation of the carbon injection system for mercury control:

(1) Eliminate reference to Subpart E from the "permitting notes" in Subsection B of Title V permit No. 0112119-011-AV. According to 40 CFR 60.50, any facility covered by Subpart Cb is not subject to Subpart E.

(2) Eliminate reference to Subpart E from Specific Condition B.10 of Title V permit No. 0112119-011-AV.

(3) Eliminate references to Subpart E and Subpart Db from Specific Condition No. 1.a.(3) of permit No. PSD-FL-105(B).

(4) Eliminate Specific Condition No. 1.b of permit No. PSD-FL-105(B), which is a Subpart Db requirement.

(5) Eliminate Specific Condition No. 1.c.(2) of permit No. PSD-FL-105(B), which is a Subpart E requirement.

(6) Eliminate Specific Condition No. B.29, "Emissions Standards for Facilities Using Waste Separators", from Permit No. 0112119-011-AV. Wheelabrator has installed an activated carbon mercury control system.

(7) Remove "Mercury is controlled by source separation techniques pursuant to Rule 62-296.416, F.A.C." from Specific Condition No. B.7.d. of Title V permit No. 0112119-011-AV.

(8) Remove "Mercury is controlled by source separation techniques pursuant to Rule 62-296.416, F.A.C." from Specific Condition No. 8.d. of permit No. PSD-FL-105(B).

(9) Eliminate Specific Condition No. B.109, "Charging Rate Monitoring", from Permit No. 0112119-011-AV, which is a Subpart E requirement.

(10) Eliminate reference to Specific Condition B.109 from Specific Condition No. B.11 of Permit No. 0112119-011-AV.

APPENDIX A

RESULTS

Table 2-2:
Unit 1 SDA Inlet and FF Outlet – Mercury

Run No.		1	2	3	Average
Date (2009)		Mar 18	Mar 18	Mar 18	
Start Time (approx.)		06:41	09:19	12:12	
Stop Time (approx.)		08:52	11:30	14:22	
Process Conditions					
R_P	Steam Production Rate (Klbs/hr)	183.6	183.4	184.0	**183.7**
P_1	Fabric Filter Inlet Temperature (°F)	313	305	305	**308**
P_2	Carbon Feed rate (lb/hr)	7	6	5	**6**
SDA Inlet Gas Conditions					
O_2	Oxygen (dry volume %)	9.7	8.9	8.9	**9.2**
CO_2	Carbon dioxide (dry volume %)	10.0	10.8	10.9	**10.5**
T_s	Sample temperature (°F)	505	506	508	**506**
B_w	Actual water vapor in gas (% by volume)	16.0	16.9	17.5	**16.8**
SDA Inlet Gas Flow Rate					
Q_a	Volumetric flow rate, actual (acfm)	176,323	173,916	177,125	**175,788**
Q_{std}	Volumetric flow rate, dry standard (dscfm)	81,161	79,153	79,904	**80,073**
SDA Inlet Sampling Data					
V_{mstd}	Volume metered, standard (dscf)	69.41	69.31	69.73	**69.48**
%I	Isokinetic sampling (%)	104.0	106.4	106.1	**105.5**
SDA Inlet Mercury Laboratory Data					
m_n	Total matter corrected for allowable blanks (µg)	105.1263	116.8821	116.3232	
SDA Inlet Mercury Results - Total					
C_{sd}	Concentration (µg/dscm)	53	60	59	**57**
C_{sd7}	Concentration @7% O_2 (µg/dscm)	66	69	68	**68**
FF Outlet Gas Conditions					
O_2	Oxygen (dry volume %)	9.4	9.2	9.2	**9.3**
CO_2	Carbon dioxide (dry volume %)	10.2	10.6	10.5	**10.4**
T_s	Sample temperature (°F)	296	290	290	**292**
B_w	Actual water vapor in gas (% by volume)	21.9	22.4	22.5	**22.3**
FF Outlet Gas Flow Rate					
Q_a	Volumetric flow rate, actual (acfm)	168,899	165,781	164,975	**166,552**
Q_{std}	Volumetric flow rate, dry standard (dscfm)	89,921	88,392	87,831	**88,715**
FF Outlet Sampling Data					
V_{mstd}	Volume metered, standard (dscf)	68.76	67.60	67.88	**68.08**
%I	Isokinetic sampling (%)	100.0	100.0	101.1	**100.4**
FF Outlet Mercury Laboratory Data					
m_n	Total matter corrected for allowable blanks (µg)	4.4126	3.1426	3.4661	
FF Outlet Mercury Results - Total					
C_{sd}	Concentration (µg/dscm)	2.3	1.6	1.8	**1.9**
C_{sd7}	Concentration @7% O_2 (µg/dscm)	2.7	1.9	2.1	**2.3**
Removal Efficiency (µg/dscm @ 7% O_2 based)		96%	97%	97%	**97%**

RESULTS

Table 2-7:
Unit 2 SDA Inlet and FF Outlet – Mercury

Run No.		1	2	3	Average
Date (2009)		Mar 16	Mar 16	Mar 16	
Start Time (approx.)		06:58	09:58	12:45	
Stop Time (approx.)		09:20	12:09	14:59	
Process Conditions					
R_P	Steam Production Rate (Klbs/hr)	184.1	184.9	183.9	184.3
P_1	Fabric Filter Inlet Temperature (°F)	315	315	315	315
P_2	Carbon Feed Rate (lb/hr)	5	7	6	6
SDA Inlet Gas Conditions					
O_2	Oxygen (dry volume %)	8.8	9.2	9.0	9.0
CO_2	Carbon dioxide (dry volume %)	10.7	10.5	10.8	10.7
T_s	Sample temperature (°F)	513	514	514	514
B_w	Actual water vapor in gas (% by volume)	15.8	16.1	16.1	16.0
SDA Inlet Gas Flow Rate					
Q_a	Volumetric flow rate, actual (acfm)	188,570	187,625	186,789	187,661
Q_{std}	Volumetric flow rate, dry standard (dscfm)	86,559	85,767	85,339	85,889
SDA Inlet Sampling Data					
V_{mstd}	Volume metered, standard (dscf)	72.69	72.64	73.32	72.88
%I	Isokinetic sampling (%)	102.1	102.9	104.4	103.2
SDA Inlet Mercury Laboratory Data					
m_n	Total matter corrected for allowable blanks (µg)	62.3587	81.4920	57.0036	
SDA Inlet Mercury Results - Total					
C_{sd}	Concentration (µg/dscm)	30	40	27	32
C_{sd7}	Concentration @7% O_2 (µg/dscm)	35	47	32	38
FF Outlet Gas Conditions					
O_2	Oxygen (dry volume %)	9.9	9.9	9.8	9.9
CO_2	Carbon dioxide (dry volume %)	9.7	9.8	10.0	9.8
T_s	Sample temperature (°F)	298	297	298	298
B_w	Actual water vapor in gas (% by volume)	21.3	20.7	21.4	21.1
FF Outlet Gas Flow Rate					
Q_a	Volumetric flow rate, actual (acfm)	178,836	178,004	180,235	179,025
Q_{std}	Volumetric flow rate, dry standard (dscfm)	96,412	96,780	97,128	96,773
FF Outlet Sampling Data					
V_{mstd}	Volume metered, standard (dscf)	74.28	73.05	74.63	73.99
%I	Isokinetic sampling (%)	100.7	98.7	100.5	100.0
FF Outlet Mercury Laboratory Data					
m_n	Total matter corrected for allowable blanks (µg)	6.8700	6.5842	7.8493	
FF Outlet Mercury Results - Total					
C_{sd}	Concentration (µg/dscm)	3.3	3.2	3.7	3.4
C_{sd7}	Concentration @7% O_2 (µg/dscm)	4.1	4.0	4.7	4.3
RE	Reduction Efficiency (% Removal)	88%	91%	85%	88%

RESULTS

Table 2-11:
Unit 3 SDA Inlet and FF Outlet – Mercury

Run No.		1	2	3	Average
Date (2009)		Mar 17	Mar 17	Mar 17	
Start Time (approx.)		06:33	09:15	11:56	
Stop Time (approx.)		08:42	11:24	14:07	
Process Conditions					
R_P	Steam Production Rate (Klbs/hr)	184.0	184.0	184.1	**184.0**
P_1	Fabric Filter Inlet Temperature (°F)	315	315	315	**315**
P_2	Carbon Feed Rate (lb/hr)	6	6	5	**6**
SDA Inlet Gas Conditions					
O_2	Oxygen (dry volume %)	9.6	9.5	9.6	**9.5**
CO_2	Carbon dioxide (dry volume %)	10.2	10.1	10.0	**10.1**
T_s	Sample temperature (°F)	488	490	493	**491**
B_w	Actual water vapor in gas (% by volume)	16.3	16.0	15.8	**16.0**
SDA Inlet Gas Flow Rate					
Q_a	Volumetric flow rate, actual (acfm)	196,240	192,853	190,845	**193,313**
Q_{std}	Volumetric flow rate, dry standard (dscfm)	91,644	90,198	89,201	**90,348**
SDA Inlet Sampling Data					
V_{mstd}	Volume metered, standard (dscf)	74.14	71.87	72.15	**72.72**
%I	Isokinetic sampling (%)	98.3	96.9	98.3	**97.8**
SDA Inlet Mercury Laboratory Data					
m_n	Total matter corrected for allowable blanks (µg)	76.7234	89.6076	95.0869	
SDA Inlet Mercury Results - Total					
C_{sd}	Concentration (µg/dscm)	37	44	47	**42**
C_{sd7}	Concentration @7% O_2 (µg/dscm)	45	54	57	**52**
FF Outlet Gas Conditions					
O_2	Oxygen (dry volume %)	10.7	10.4	10.3	**10.4**
CO_2	Carbon dioxide (dry volume %)	9.1	9.2	9.4	**9.2**
T_s	Sample temperature (°F)	295	296	296	**296**
B_w	Actual water vapor in gas (% by volume)	19.8	20.0	19.9	**19.9**
FF Outlet Gas Flow Rate					
Q_a	Volumetric flow rate, actual (acfm)	186,547	183,521	178,024	**182,697**
Q_{std}	Volumetric flow rate, dry standard (dscfm)	102,140	100,105	97,228	**99,824**
FF Outlet Sampling Data					
V_{mstd}	Volume metered, standard (dscf)	79.35	77.16	75.17	**77.23**
%I	Isokinetic sampling (%)	101.6	100.8	101.1	**101.2**
FF Outlet Mercury Laboratory Data					
m_n	Total matter corrected for allowable blanks (µg)	6.6466	7.0201	6.5708	
FF Outlet Mercury Results - Total					
C_{sd}	Concentration (µg/dscm)	3.0	3.2	3.1	**3.1**
C_{sd7}	Concentration @7% O_2 (µg/dscm)	4.0	4.2	4.1	**4.1**
Removal Efficiency (µg/dscm @ 7% O_2 based)		91%	92%	93%	**92%**