

Technical Evaluation
and
Preliminary Determination

McKay Bay Refuse-to-Energy Project
1000 Ton Per day Solid Waste Disposal Facility
Hillsborough County, Florida

Federal Permit Number:

PSD-FL-086

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
March 17, 1982

Table of Contents

	Page
Public Notice	i
I. Synopsis of Application	1
A. Applicant Name and Address	
B. Source Location	
C. Project Description	
II. Applicability	2
III. Source Impact Analysis	3
A. Emission Limitations	
B. Air Quality Impacts	
C. Additional Impacts Analysis	
IV. Conclusions	6
Appendices	
Appendix A BACT Analysis	7
Appendix B Air Quality Analysis	11
Appendix C Additional Impacts	18
Appendix D Federal General and Specific Conditions	19
Attachments	
McKay Bay Refuse-to-Energy permit application	

PUBLIC NOTICE

Construction of an air pollution source is being proposed by the City of Tampa to be located in the City of Tampa, Hillsborough County, Florida. The proposed project is the construction of a 1000 ton per day solid waste resource recovery facility. The construction will increase emission of air pollutants, in tons per year, by the following amounts:

<u>PM</u>	<u>Pb</u>	<u>SO₂</u>	<u>NO_x</u>	<u>CO</u>	<u>VOC</u>	<u>F</u>	<u>Hg</u>	<u>Be</u>
122.2	13.6	744.6	1314	75	74.5	39.4	1.8	.0012

The proposed construction has been reviewed by the Florida Department of Environmental Regulation (FDER) under Federal regulation 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The Department has made a preliminary determination that the construction can be approved provided certain conditions are met. A summary of the basis for the determination and the application for a federal permit submitted by the City of Tampa are available for public review at the following offices:

Bureau of Air Quality Management
Department of Env. Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Southwest District
Dept. of Env. Regulation
7601 Highway 301 North
Tampa, Florida 33610

Hillsborough County Env. Prot. Commission
1900 9th Avenue
Tampa, FL 33605

The maximum percentages of allowable PSD increments consumed in the area of the proposed construction will be as follows:

	Annual	24-Hour	3-Hour
PM	N/A	N/A	N/A
SO ₂	10	48	38

Any person may submit written comments to FDER regarding the proposed construction. All comments, postmarked not later than 30 days from the date of notice, will be considered by FDER in making a final determination regarding approval for construction of this source. Those comments will be made available for public review on request. Furthermore, a public hearing can be requested by any person. Such request should be submitted within 14 days of the date of this notice.

Letters should be address to:

Mr. C. H. Fancy
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

I. SYNOPSIS OF APPLICATION

A. Name and Address of Applicant

City of Tampa
306 East Jackson Street
Tampa, Florida 33602

B. Source Location

The proposed source is located on a fourteen acre site adjacent to McKay Bay, south of Florida Route 60 in Tampa, Hillsborough County, Florida. The UTM coordinates are: Zone 17 - 360.0 km East and 3091.9 km North.

C. Project Description

The applicant proposes to rehabilitate the old municipal incinerator into a 1,000 tons per day solid waste resource recovery facility capable of generating electricity for sale to Tampa Electric Company.

The existing incinerator system consists of three mass burn combustion trains, without energy recovery, based upon the Volund technology. Each unit is rated at 250 tons per day. A fourth unit is to be added, thus increasing the design capacity of the facility to 1,000 tons per day. The incinerator will be rehabilitated into a resource recovery facility by the addition of waste heat boilers, electrostatic precipitators and turbine generators. Ash produced by the combustion process will be handled by a wet system. The wet ash will be dewatered and loaded into trucks for subsequent disposal in the City's designated residue disposal site.

II. APPLICABILITY

The proposed project is subject to preconstruction review under federal Prevention of Significant Deterioration (PSD) regulations, Section 52.21 of Title 40 of the Code of Federal Regulations as amended in the Federal Register of August 7, 1980 (45 FR 52676). Specifically, the McKay Bay Refuse-to-Energy Project is a major stationary source (40 CFR 52.21(b)(1)) located in an area currently designated in accordance with 40 CFR 81.310 as nonattainment for the criteria pollutants particulate matter (PM) and ozone (O₃), as unclassified for the criteria pollutant sulfur dioxide (SO₂) and as attainment for the criteria pollutants nitrogen oxides (NO_x), carbon monoxide (CO) and lead (Pb). Emissions of PM, SO₂, NO_x, Pb, fluoride (F), mercury (Hg) and beryllium (Be) will increase above the significant criteria set in the PSD regulations. Emissions of PM and VOC are exempt from PSD requirements according to 40 CFR 52.21 (i)(5) since the area is designated nonattainment for particulate matter and ozone. The nonattainment pollutants are permitted according to the new source review requirements for nonattainment areas contained in 17-2.17, Florida Administrative Code. Therefore, the proposed project is subject to PSD review for the pollutants SO₂, NO_x, Pb, F, Hg and Be.

This review consists of a determination of Best Available Control Technology (BACT) and, unless otherwise exempted, an analysis of the air quality impact of the increased emissions. The review also includes an analysis of the project's impacts

on soils, vegetation and visibility along with air quality impacts resulting from associated commercial, residential and industrial growth.

The proposed project is also subject to the provisions of the federal New Source Performance Standard (NSPS) for incinerators, 40 CFR 60, Subpart E.

III. SOURCE IMPACT ANALYSIS

A. Emissions Limitations

The operation of the proposed resource recovery facility will produce emissions of particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds, (VOC), lead (Pb), fluoride (f), mercury (Hg), and beryllium (Be).

Table 1 summarizes the potential to emit of all pollutants regulated under the Act which are emitted by the proposed source.

Best Available Control Technology (BACT) has been determined for SO₂, NO_x, Pb, F, Hg and Be. The emission limiting standards selected as BACT and made a condition of the permit are listed in Table 2. Justification for the standards selected is included in Technical Appendix A.

The permitted emissions, including those determined as BACT, are in compliance with the New Source Performance Standard (NSPS) requirements of 40 CFR 60, Subpart E.

B. Air Quality Analysis

An air quality impact analysis has been performed to evaluate the impact of the proposed project on ambient concentrations of

Table 1
Summary of Emissions
 (tons per year)

Pollutant	Potential Emissions ^(a)		Significance Level ^(c)
	Facility 1		
	Before Controls	After Controls	
PM ^(b)	19970.0	122.2	25
SO ₂	744.6	744.6	40
NOx	1314.0	1314.0	40
CO	74.5	74.5	100
VOC ^(b)	39.4	39.4	40
Pb	13.6	13.6	0.6
F	18.4	18.4	3
Hg (vaporous)	1.8	1.8	0.1
Hg (particulate)	0.067	0.067	
Be	0.0012	0.0012	0.0004

- (a). Potential emissions in accordance with federal definition as estimated by the applicant.
- (b). Subject to Lowest Achievable Emission Rate (LAER) requirements for nonattainment areas.
- (c). 40 CFR 52.21(b) (23).

Table 2
Allowable Emission Limits

1000 ton per day solid waste resource recovery facility

Pollutant	Standard	Facility 1 (lb/hr)	<i>changed to:</i>	Basis
PM	0.025 grain/dscf	27.9		LAER
SO ₂	0.453 lb/MMBTU	170.0		BACT
NO _x	-	300.0		BACT
VOC	-	9.0		BACT
Pb	-	3.1		BACT
F	-	4.2	6.0	BACT
Hg (vaporous)	-	0.4	} 0.6	BACT
Hg (particulate)	-	0.015		BACT
Be	5 grams/24/hr period	0.00026	.00046	BACT

SO₂, NO₂, Pb, F, Be and Hg. Dispersion modeling was used to evaluate the impacts.

Results of the analysis provide reasonable assurance that the project, as described in this permit and subject to the conditions of approval proposed herein, will not lead to any violation of National Ambient Air Quality Standards or PSD increments.

Details of the analysis are discussed in the Technical Appendix B.

C. Additional Impacts Analysis

An additional impact analysis has been performed to assess (1) the impact of the proposed project on soils, vegetation, and visibility and (2) any air quality impacts resulting from associated commercial, residential, or industrial growth. No adverse impacts are expected; details of the analysis are discussed in Technical Appendix C.

IV. CONCLUSIONS

Based on review of the data submitted by the City of Tampa for the construction and operation of the 1,000 ton per day solid waste resource recovery facility, the FDER concludes that compliance with all applicable federal air quality regulations will be achieved provided certain specific conditions are met. The allowable emissions in Table 2 have been determined to be Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) for the respective pollutants for this source. The impact of emissions from the resource recovery facility will not cause or contribute to a violation of any ambient air quality standard or PSD increment. Appendix D includes the proposed general and specific conditions of approval for the federal permit (PSD-FL-086).

TECHNICAL APPENDIX A
FEDERAL BACT ANALYSIS

The applicant is required, under the provisions of 40 CFR 52.21, as revised August 7, 1980 (45 FR 52676), to apply BACT to all criteria and noncriteria pollutants emitted in significant levels. BACT is determined for each pollutant on a case-by-case review taking into account energy, environmental and economic impacts.

The applicant has proposed BACT for each applicable pollutant and has presented justification for the standards selected. The Florida Department of Environmental Regulation (FDER) has reviewed and accepted the technology and emission limits proposed as BACT. The federal PSD permit shall include these limits or any more stringent emission standards that are imposed by the State of Florida. These limits are summarized in Table 2. A discussion of the BACT for each pollutant follows:

Sulfur Dioxide Control

The BACT limitation proposed for sulfur dioxide (SO₂), 170.0 lb/hr, is based upon the highest stack test results obtained from information supplied by Waste Management, Inc. (WMI), the current Volund technology licensee.

The sulfur dioxide emissions from the mass burners depend on the sulfur content of the waste being fed to the burners. The sulfur content estimated by the applicant is the equivalent of low sulfur fuel (0.453lb/MMBTU).

Both wet and dry scrubbing systems were investigated as representing BACT. In addition to controlling SO₂, the scrubbers could also reduce the emission of nitrogen oxides, hydrogen chloride and the other gaseous pollutants. Both scrubbing systems were rejected for the following reasons. The wet system would create problems with the water retention pond and increased corrosion from the wet stack conditions. A dry scrubbing system with a baghouse for particulate control was rejected since this technology is still unproven for this application. The applicant also stated that bond financing would be difficult to obtain with scrubbing systems unproven in practice.

Since the air quality dispersion modeling indicates no problems meeting the ambient air quality standard and the PSD increment, add-on controls could not be economically justified. Additional room for control equipment is available if future problems occur. Therefore, FDER feels the applicant's proposed limitation of 170.0 lb/hr is reasonable as BACT for sulfur dioxide emissions.

Nitrogen Oxides Control

The applicant proposes an emission level for nitrogen oxides (NO_x) based on emission estimates from the highest stack test results obtained from WMI.

NO_x emissions are a function of combustion efficiency and excess air present. NO_x emissions are also dependent on the nitrogen content of the waste and the heat of combustion temperature which oxidizes the nitrogen in the air. Another factor is

that combustion temperature and dwell time is higher in order to eliminate odor.

Several methods are being investigated to control NO_x during the burning of the fuel or the treatment of the flue gas. These methods are in the research and development stage and will require additional testing before being considered as representing BACT.

Therefore, FDER agrees with the applicant that the proper boiler design and operating procedures represent BACT for NO_x. For the facility, maximum emission of 300.0 lb/hr for NO_x constitutes BACT at this emission level, the ambient air quality standard will not be threatened.

Lead, Beryllium and Mercury Control

The applicant proposes emission limits based upon the WMI emission estimates from stack tests. These have been recalculated to reflect the particulate matter reduction used in the LAER determination from 0.03 to 0.025 grains/dscf.

Since the particulate matter emissions are being controlled by LAER, additional controls are not feasible for a BACT determination. Therefore, FDER has determined that 3.1 lb/hr of lead emissions, 0.015 lb/hr of particulate mercury emissions, and 0.00026 lb/hr of beryllium emissions represent BACT for the facility.

Fluoride and Gaseous Mercury Control

The equipment available to remove the fluoride and gaseous mercury emissions is the same type as that used to control sulfur dioxide emissions. Therefore, the same deter-

mination applies for these pollutants. FDER concurs with the applicant that 4.2 lb/hr of fluoride emissions and 0.4 lb/hr of gaseous mercury emissions represent BACT for the facility.

APPENDIX B
AIR QUALITY IMPACT ANALYSIS

A. Summary

The PSD review process requires an air quality impact analysis for all applicable pollutants. This analysis includes the use of EPA-approved air quality dispersion models in conjunction with ambient air monitoring data. Estimates of maximum ground-level concentrations are determined for comparison with state and federal standards. The analysis requires:

- o An analysis of existing air quality;
- o A PSD increment analysis (for PM and SO₂ only);
- o A National Ambient Air Quality Standards (NAAQS) analysis;
- o An analysis of impact on soils, vegetation, and visibility and growth-related air quality impacts; and
- o A good engineering practice stack height evaluation.

In addition, preconstruction monitoring may be necessary to establish existing air quality conditions if valid monitoring data do not presently exist.

The proposed project is subject to PSD review for SO₂, NO₂, Pb, F, Hg (vaporous and particulate), and Be. Because the project is located in an area that is nonattainment for PM, it is exempt from PSD review for PM and is reviewed under the more stringent State nonattainment process. Only SO₂, NO₂, and Pb are criteria pollutants for which NAAQS are established.

Based on these required air quality impact analyses, FDER has reasonable assurance that the subject facility, as described in this permit and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any PSD increment or ambient air quality standard. A discussion of the required analyses follows.

B. Discussion

1. Modeling Methodology

The EPA-approved Single-Source CRSTER dispersion model was used in the air quality impact analyses.

This model was used to determine the maximum predicted annual and short-term ground-level ambient concentrations of the subject pollutants. Receptors were located in 36 azimuthal directions surrounding the facility in concentric rings ranging from 0.5 to 9.0 kilometers. All emission stacks (2) were collocated. The stack parameters used in the modeling are given in Table B-1.

The surface and upper air meteorological data used in the model were National Weather Service data collected at Tampa, Florida during the period 1970-1974.

Table B-1

Stack Parameters for McKay Bay Refuse-to-Energy Project

<u>Emissions Unit</u>	<u>Stack Height (m)</u>	<u>Stack Diameter (m)</u>	<u>Exit Velocity (m/s)</u>	<u>Exit Temperature (K)</u>
1	45.72	1.75	23.40	500
2	45.72	1.75	23.40	500

2. Analysis of Existing Air Quality

In order to evaluate existing air quality in the area of a proposed project, FDER may require a period of continuous preconstruction monitoring for any pollutant subject to PSD review. An exemption from this requirement may be obtained if the net emissions increase of the pollutant would cause an air quality impact less than a certain de minimum level as defined in 40 CFR 52.21(i)(8) or current monitoring data of sufficient quantity and quality already exist within the area of maximum impact of the proposed project.

Table B-2 lists the subject pollutants and their maximum projected impacts in comparison with the de minimus levels mentioned above.

Table B-2

Projected Air Quality Impacts from Proposed Project

<u>Pollutant</u>	<u>Averaging Time</u>	<u>Projected Impact (ug/m³)</u>	<u>De Minimus Level (ug/m³)</u>
SO ₂	24-hour	9	13
NO ₂	Annual	2	14
Pb	24-hour	0.2	0.1
Hg	24-hour	0.02	0.25
Be	24-hour	0.00003	0.0005
F	24-hour	0.23	0.25

Table B-2 shows that NO₂, Hg, Be, and F have projected maximum impacts less than the de minimus levels and therefore are not subject to preconstruction monitoring. Since the proposed facility is located near the Tampa urban area, existing monitoring data for Pb were available for use by the applicant.

Two continuous SO₂ monitors, four Pb monitors and one NO₂ monitor within several kilometers of the proposed site were used in the air quality analysis. Table B-3 lists the highest recorded monitored values for these pollutants at these sites for the previous year (1980).

Table B-3

Monitoring Results, SO₂ and Pb (ug/m³)

<u>Station</u>	<u>Pollutant</u>	<u>3-hour*</u>	<u>24-hour*</u>	<u>90-day</u>	<u>Annual</u>
Davis Island	SO ₂	496/465	89/87		21
Hookers Pt.	SO ₂	476/469	132/106		20
Davis Island	Pb			0.24	
Hookers Pt.	Pb			0.28	
Health Dept.	Pb			0.43	
Hwys. 60 & 41	Pb			0.93	
Hookers Pt.	NO ₂				33

*Values represent the highest and the highest and second-highest for the year.

3. PSD Increment Analysis

PSD increment analysis pertains to PM and SO₂ for which maximum allowable increases (increments) are defined. The proposed project is located in an area designated as nonattainment for PM and therefore not subject to PSD review for that pollutant. The area is classified as Class II for SO₂. The nearest Class I area is the Chassahowitzka National Wilderness Area approximately 77 kilometers to the north-northwest.

All SO₂ emissions from the proposed project will consume increment. In addition, all other increment consuming sources that might impact the project area were included in the analysis. Table B-4 lists the maximum increment consumption expected in the project area.

Table B-4

Maximum Increment Consumption (SO₂)

<u>Avering Time</u>	<u>Class II Increment Consumed (ug/m³)</u>	<u>Allowable Class II Increment (ug/m³)</u>
3-hour	193	512
24-hour	44	91
Annual	2	20

The SO₂ significant impact area of the proposed project is the area encompassing all predicted concentrations greater than 1 ug/m³ on an annual average. The greatest distance to the edge of this area is less than 10 kilometers. No significant impact on the nearest Class I area, 77 kilometers away, is expected as a result of this project.

4. Ambient Air Quality Standards Analysis

The PSD regulations require the permit applicant to demonstrate that, given existing air quality in an area, a proposed emissions increase subject to PSD review will not cause or contribute to any violation of ambient air quality standards. For the proposed project, an ambient air quality standards analysis is required for SO₂, NO₂, and Pb.

A conservative estimate of the maximum concentration to be expected, for comparison with the National Ambient Air Quality Standards (NAAQS), is obtained by adding the maximum (highest, second-high) predicted ground-level concentration as modeled for the proposed project to the maximum monitored value in the vicinity for each respective pollutant. These maximum background values for SO₂, NO₂, and Pb have been established in Section 2 of this appendix. Table B-5 lists the maximum predicted concentrations expected to occur in project area for comparison with the NAAQS.

Table B-5

Maximum Predicted Concentrations

<u>Pollutant</u>	<u>Predicted Impact (ug/m³)</u>	<u>NAAQS (ug/m³)</u>
SO ₂		
Annual	22	80
24-hour	141	365
3-hour	524	1300
NO ₂		
Annual	35	100
Pb		
90-day	1.0	1.5

Estimates of the maximum concentrations from the proposed project for F, Hg, and Be are given in Table B-2. These substances do not have an ambient air quality standard to compare with. However, all have maximum estimated impacts below the de minimus values as set forth in section 2. These de minimus levels are determined to be below that which could be detected accurately. As such, F, Hg, and Be are not expected to pose any threat to public health or welfare in the area.

5. Good Engineering Practice Stack Height Evaluation

The good engineering practice (GEP) stack height is defined as:

$$H(\text{GEP}) = H_b + 1.5L$$

where H_b is the building height, and L is the lesser dimension of the building height or width.

The proposed project will have a building height of 60 feet with greater than 60 feet horizontal dimensions. The GEP stack height is calculated to be 150 feet. This is the proposed stack height and the stack height that was in the modeling.

APPENDIX C

Analysis of Impact on Soils, Vegetation and Visibility and Growth-Related Air Quality Impacts

The maximum impact of the proposed project, as demonstrated through the air quality analysis, will be below the national secondary air quality standards for SO₂. These standards were established to protect public welfare related values. Also, the maximum impact of NO₂, Hg, F, and Be by the facility were shown to be less than de minimus, in terms of monitoring detection. As such, these low level additions to the ambient air are expected to have no adverse effect on soils, vegetation, and visibility. Addition of Pb is shown to have ambient impacts greater than the de minimus values associated with monitoring. In the case of Pb, the maximum additional impact to the ambient air is approximately two percent of the standard. Since this addition will not cause a violation to occur, no significant adverse effect is expected.

A visibility analysis was performed to determine any impact on the nearest Class I area, the Chassahowitzka National Wilderness Area. A Level I analysis, as defined the EPA "Workbook for Estimating Visibility Impairment", showed no potential visibility impact.

A construction work force of between 150 to 300 persons will be needed for the project. Nearly all of this work force will be available in the Tampa area. There should be little to no secondary residential, commercial or industrial growth associated with the proposed project that would cause adverse effects to air quality.

APPENDIX D
SPECIFIC CONDITIONS

FDER proposes a preliminary determination of approval with conditions for the project (construction of a 1,000 ton per day solid waste resource recovery facility) requested by the City of Tampa in the complete permit application submitted on October 26, 1981.

The proposed specific and general conditions of approval follow.

SPECIFIC CONDITIONS

1. The maximum allowable emissions from the resource recovery facility no. 1 shall be:

<u>Pollutant</u>	<u>Emission Limitation</u>
Sulfur dioxide	170.0 lb/hr
Nitrogen Oxides	300.0 lb/hr
Lead	3.1 lb/hr
Fluoride	4.2 lb/hr
Mercury (vaporous)	0.4 lb/hr
Mercury (particulate)	0.015 lb/hr
Beryllium	5 grams/24-hr period 0.00026 lb/hr

2. Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

3. Electric output for sale to Tampa Electric Company (TECO) shall not exceed 25 MW.

4. Hours of operation for the facility shall be 24 hours per day, 7 days per week, 52 weeks per year.

5. An operation and maintenance plan shall be submitted with the state operating permit application and be made part of this permit.

6. Compliance testing for all criteria and NESHAPS pollutants shall be conducted in accordance with the methods contained in 40 CFR 60 and 61. A source testing plan shall be submitted to the Department of Environmental Regulation for approval 90 days prior to testing. The Department shall be notified of compliance testing at least 30 days prior to the testing.

GENERAL CONDITIONS

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

(d) steps taken by the permittee to reduce and eliminate the noncomplying emission,

and

(e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

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

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

(d) to sample at reasonable times any emission of pollutants;

and

(e) to perform at reasonable times an operation and maintenance inspection of the permitted source.

9. All correspondence required to be submitted to this permit to the permitting agency shall be mailed to:

Mr. James T. Wilburn
Chief, Air Management Branch
Air & Waste Management Division
U.S. EPA, Region IV
345 Courtland Street, NE
Atlanta, GA 30365

10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

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