



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road, M.S. #5505  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

*Electronic Mail – Received Receipt Requested*

Mr. Gary Main, Facility Manager  
Covanta Lake II, Inc.  
3830 Rogers Industrial Park Road  
Okahumpka, Florida 34762

Re: Title V Air Operation Permit Renewal  
Proposed Permit No. 0690046-010-AV  
Lake County Resource Recovery Facility

Dear Mr. Main:

One copy of the proposed permit determination for renewal of the Title V air operation permit for the Lake County Resource Recovery Facility is enclosed. The existing facility is located in Lake County at 3830 Rogers Industrial Park Road, Okahumpka, Florida. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is: "<http://www.dep.state.fl.us/air/emission/apds/default.asp>"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you have any questions, please contact the Project Engineer, Yousry (Joe) Attalla, by telephone at (850) 717-9078 or by e-mail at [yousry.attalla@dep.state.fl.us](mailto:yousry.attalla@dep.state.fl.us).

Sincerely,

Jeffery F. Koerner, Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

9-27-11

(Date)

Enclosures  
JFK/jkh/yha



## PROPOSED PERMIT DETERMINATION

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Copies sent by electronic mail (return receipt requested) to the following:

Mr. Gary Main, Covanta Lake II, Inc.: [gmain@covantaenergy.com](mailto:gmain@covantaenergy.com)

Mr. Viet Ta, Covanta Lake II, Inc.: [vta@covantaenergy.com](mailto:vta@covantaenergy.com)

Mr. Jason Gorrie, P.E., Covanta Energy: [jgorrie@covantaenergy.com](mailto:jgorrie@covantaenergy.com)

Ms. Caroline Shine, DEP Central District Office: [caroline.shine@dep.state.fl.us](mailto:caroline.shine@dep.state.fl.us)

Ms. Katy Forney, U.S. EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)

Ms. Ana Oquendo, U.S. EPA Region 4: [oquendo.ana@epa.gov](mailto:oquendo.ana@epa.gov)

Ms. Barbara Friday, DEP OPC: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)

Ms. Lynn Searce, DEP OPC: [lynn.searce@dep.state.fl.us](mailto:lynn.searce@dep.state.fl.us) (for reading file)

## PROPOSED PERMIT DETERMINATION

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### I. Public Notice.

An Intent To Issue Air Permit issued to Covanta Lake II, Inc. for the Lake County Resource Recovery Facility located at 3830 Rogers Industrial Park Road, Okahumpka, Florida, Lake County, was clerked on August 12, 2011. The Public Notice Of Intent To Issue Air Permit was published in the Orlando Sentinel on August 14, 2011. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue Air Permit was received on August 22, 2011.

### II. Public Comment(s).

No comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the draft permit are indicated by a double underline. Deletions from the draft permit are indicated by a ~~strike through~~.

#### Letter from Gary Main dated September 2, 2011.

**Comment 1. Facility Description.** On page 2 of 27: In the first paragraph, please change the combustors grate system from "horizontal" to "inclined". In the second sentence, please change "municipal solid waste monofills via truck or rail" to "municipal solid waste Class I landfill".

**Response 1.** The Department agrees with the comment in the first paragraph. The facility description is changed to read as follows:

"Each MSWC processing train consists of a feed hopper, a mass-fed waterwall furnace with a ~~horizontal~~ an inclined grate system".

Following a discussion with staff in the Department's Division of Waste Management, we have revised the second paragraph to read as follows:

Bottom ash from the furnaces, as well as the fly ash from the scrubbers and baghouses, is processed in an ash handling system ~~and transported off-site to municipal solid waste ash monofills via truck or rail.~~ All ash residue shall be transported to and disposed at a Department permitted Class I landfill or ash monofill having an in-place bottom liner and leachate collection system.

**Comment 2.** Specific Condition A.11. Nitrogen Oxides on page 12 of 27: Please add "Compliance determination is based on a 24-hr daily block average".

**Response 2.** Pursuant to 40 CFR 60.58b(h)(3), Specific Condition A.11. is corrected to read as follows:

**A.11. Nitrogen Oxides (NO<sub>x</sub>).** As determined by the CEMS, the maximum emission limit for nitrogen oxides contained in the gases discharged to the atmosphere from each MWC unit shall not exceed 205 parts per million by volume, corrected to 7 percent oxygen, on a dry basis. Compliance with this emission limit is based on a 24-hour daily arithmetic average of the hourly emission concentrations recorded by the CEMS. [Rule 62-204.800(9)(b)3.h., F.A.C., 40 CFR 60.33b(d); 40 CFR 60.58b(h)(3); and, 0690046-003-AC/PSD-FL-113(E)]

**Comment 3.** Specific Condition A.13. Dioxin/Furan on page 12 of 27: Please add "Compliance determination is by stack tests".

**Response 3.** The Department agrees with the comment. Specific Condition A.13. is revised to read as follows:

**A.13. Dioxins/Furan (D/F).** As determined by stack tests, the maximum emission limit for dioxins/furans contained in the gases discharged to the atmosphere from each MWC unit is 30 nanograms per dry standard cubic meter (total mass), corrected to 7 percent oxygen. [62-204.800(9)(b)3.g., F.A.C. and 40 CFR 60.33b(c)(1)(iii)]

**Comment 4.** Specific Condition A.23. Federal Requirements on page 13 of 27: Please add Appendix ZZZZ.

## PROPOSED PERMIT DETERMINATION

**Response 4.** The department does not agree. Specific Condition **A.23.** is customized for emissions Units 001 and 002 (mass burn waterwall boilers) and these boilers are not subject to Appendix ZZZZ. The Appendix ZZZZ is for the diesel-fired reciprocating internal combustion engine (RICE), relevant to emission Unit 004 and described in Section III Subsection C. No changes are made to the permit.

**Comment 5.** Specific Condition **A.28.** NSPS Startup, Shutdown and Malfunction Provisions on page 14 of 27: Please add paragraph "d." during a loss of boiler water level control or loss of combustion air control malfunction period as specified in 40 CFR 60.58b(a)(1)(iii), a diluents cap of 14% for oxygen or 5% for carbon dioxide may be used in the emissions calculations for sulfur dioxide and nitrogen oxides".

**Response 5.** The requested addition is acceptable and has been made to Specific Condition **A.28.**

d. During a loss of boiler water level control or loss of combustion air control malfunction period as specified in 40 CFR 60.58b(a)(1)(iii), a diluent cap of 14 percent for oxygen or 5 percent for carbon dioxide may be used in the emissions calculations for sulfur dioxide and nitrogen oxides. [40 CFR 60.58b(b)(8)]

**Comment 6.** Specific Condition **A.30.b.** Activated Carbon Injection on page 15 of 27: Please add a clarification to paragraph b. to specify that compliance determination is based on an 8-hr block average.

**Response 6.** The requested addition is acceptable and has been made. The Specific Condition **A.30.b.** is clarified and corrected with the following addition as follows:

b. During operation of the affected facility, the carbon injection system operating parameter(s) that are the primary indicator(s) of the carbon mass feed rate ( e.g., screw feeder setting) must equal or exceed the level(s) documented during the performance tests specified under paragraphs a.(1) and a.(2) shall be averaged over a block 8-hour period, and the 8-hour block average must equal or exceed the level(s) documented during the performance tests specified under paragraphs (m)(1)(i) and (m)(1)(ii) of 40 CFR 60.58b, except as specified in paragraphs (m)(2)(i) and (m)(2)(ii) of 40 CFR 60.58b. (See Appendix NSPS Eb: 40 CFR 60, Subpart Eb - Standards of Performance for Large Municipal Waste Combustors.)

**Comment 7.** Specific Condition **A.34.f.** CEMS Operation on page 17 of 27: Please delete the sentence stating "A carbon monoxide value of 400 ppmvd shall indicate good combustion".

**Response 7.** The Department agrees with the comment as this is not an applicable requirement for this facility. The requested deletion has been made.

**Comment 8.** Specific Condition **A.35.** Test Methods on page 17 of 27: Please add Method 22 for fugitive ash emissions.

**Response 8.** The requested addition is acceptable and has been made.

**Comment 9.** Specific Condition **A.39.** Reporting Schedule on page 18 of 27: Please delete MSW Charging Rate Monitoring and Segregated Solid Waste Record Keeping from the Table. The underlying conditions require that the documents be prepared and maintained - there is no requirement for submittal of a Report to the Compliance Authority. Please add semi-annual and annual NSPS Subpart Cb reports to the table.

**Response 9.** The Department agrees with the comment. The requested deletions have been made and Specific Condition **A.39.** is corrected to read as follows:

**A.39. Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
MSW Charging Rate Monitoring	Average daily basis	<del>A.32.</del>
NSPS Excess Emissions Reports	Quarterly <u>Semi-Annual</u>	<b>A.41.</b>
<del>Segregated Solid Waste Record Keeping</del>	30-day period	<del>A.42.</del>

[Rule 62-213.440, F.A.C.]



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**Comment 10.** Specific Condition **A.46.a.** Other Operating and Training Requirements on page 20 of 27: Please add a clarification as to the duration of the absents as follow:

When the certified chief facility operator (CFO) and certified shift supervisor (SS) are both off-site for 12 hours or less, and no other certified operator is on-site, the provisionally certified control room operator (CRO) may perform the duties of the certified CFO or certified SS. [40 CFR 60.54b(c)(2)(i)]

When the certified CFO and certified SS are off-site for more than 12 hours, but for two weeks or less, and no other certified operator is on-site, the provisionally certified CRO may perform the duties of the certified CFO or certified SS without notice to, or approval by the administrator. However, the owner or operator of the affected facility must record the period when the certified CFO or certified SS are off site and include that information in the annual report as specified under 40 CFR 60.59b(g)(5). [40 CFR 60.54b(c)(2)(ii)]

When the certified CFO and certified SS are off site for more than 2 weeks, and no other certified operator is on-site, the provisionally certified CRO may perform the duties of the certified CFO or certified SS without approval by the Administrator. However, the owner or operator must take two actions:

- a. Notify the Administrator in writing. In the notice, state what caused the absence and what actions are being taken by the owner or operator of the facility to ensure that a certified chief facility operator or certified shift supervisor is on site as expeditiously as practicable.
- b. Submit a status report and corrective action summary to the Administrator every four weeks following the initial notification. If the Administrator provides notice that the status report or corrective action summary is disapproved, the municipal waste combustion unit may continue operation for 90 days, but then must cease operation. If corrective actions are taken in the 90-day period such that the Administrator withdraws the disapproval, municipal waste combustion unit operation may continue.

[40 CFR 60.54b(c)(2)(iii)].

**Response 10.** The requested additions are included in the updated Appendix NSPS Eb: 40 CFR 60, Subpart Eb - Standards of Performance for Large Municipal Waste Combustors, version dated 4/21/08 (See **Response 11.**). So, Specific Condition **A.46.** has been deleted and a cross reference to Appindix Eb has been added to Specific Condition **A.45.** to read as follows:

**A.45. Operator Training and Certification.** Operator training and certification for the each MWC shall be at least as protective as those requirements listed in 40 CFR 60.54b of NSPS 40 CFR 60 Subpart Eb (See Appendix NSPS Eb: 40 CFR 60, Subpart Eb - Standards of Performance for Large Municipal Waste Combustors.). Compliance with these requirements shall be in accordance with the schedule specified in 40 CFR 60.39b(c)(4). [Rule 62-204.800(9)(b)5., F.A.C.; and, 40 CFR 60.35b & 40 CFR 60.54b.]

Please see Appendices Section **VI.** (Rule 62-204.800(9)(b)4&5, F.A.C.; and, 40 CFR 60.34b & 40 CFR 60.35b of NSPS Subpart Cb; and, 40 CFR 60.53b & 40 CFR 60.54b of NSPS Subpart Eb).

**Comment 11.** In Section **VI.** Appendices, Appendix NSPS Eb. The attached version dated 11/21/03 does not contain Federal revisions of 5/10/06 so it should be replaced with version dated 4/21/08 or later.

**Response 11.** The Appendix NSPS 40 CFR 60 subpart Eb has been replaced with the version dated 4/21/08.

### **III. Conclusion.**

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit.

The permitting authority will issue the proposed permit No. 0690046-010-AV, with the changes noted above.