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| --- | --- | --- | --- |
| ARMS ID  0110351 | OWNER/COMPANY  South Florida Water Management District | | SITE NAME  S-8 and G-404 Pump Stations |
| ■ TITLE V | | SYNTHETIC MINOR  (Emissions limited to > 80% and < 100% of major source thresholds) | DATE OF THIS FCE: 11 / 26 / 2013  ■ ON-SITE ASSESSMENT  OFF-SITE ASSESSMENT  (Explain reason for Off-Site in ‘Comments’) |
| TITLE V MEGA-SITE\* | | OTHER: | DATE OF PREVIOUS FCE: 11/ 09 / 2011 |

\*Facility with a large number of complex emissions units. It is more reasonable to evaluate a Title V Mega-Site once every 3 years instead of once every 2 years.

Review of All Required Reports

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| --- | --- | --- |
| PERIODIC REPORTS | | COMMENTS |
| ■ DONE  N/A | Annual Operating | 3-14-2012; 3-15-2013 |
| ■ DONE  N/A | Annual Statement of Compliance – Title V | LH: 2012 SOCR Checked box "A". Reviewed using SWD checklist as guidance. Received 1/15/2013.  WF: SOCR received 1/18/12 Mark of "A". |
| ■ DONE  N/A | Title V Semi-Annual Monitoring | 2013 1st half, SAM Received 12-5-2013.  LH: 2012 2nd half, SAM Received 1/15/2013. Operator advised us that there are no general or specific requirements to submit semi-annual reports for this facility.  LH: 2012 1st half, SAM Received 7/6/2012. Operator advised us that there are no general or specific requirements to submit semi-annual reports for this facility. |
| DONE ■ N/A | Semi-Annual Compliance |  |
| DONE ■ N/A | Quarterly Compliance |  |
| ■ DONE  N/A | Stack Test (Initial Test of Control Equip) | 8-6-2013 PT: witnessed the initial test of the diesel oxidation catalyst units on engine 1, run 1 and 2, and engine 4, run 3. The pressure drop across the catalyst fluctuated between 0` and 2` of H2O throughout the test. The facility contact explained that the facility experiences problems with this tubing because it has a tendency to clog. The temperature tended to range in the 540-570 degree Fahrenheit range.  The catalyst elements were being installed in the G 404 units to be tested the following day.  There were no violations noted. |
| DONE ■ N/A | Visible Emissions Test |  |
| DONE ■ N/A | Other: |  |

|  |  |  |
| --- | --- | --- |
| CONTINUOUS EMISSION MONITOR REPORTS | | COMMENTS |
| DONE ■ N/A | Quarterly excess emissions |  |
| DONE ■ N/A | Semi-annual |  |
| DONE ■ N/A | RATA |  |
| DONE ■ N/A | CGA |  |
| DONE ■ N/A | Other : |  |
| DONE ■ N/A | Other : |  |

Observations and Records Review

|  |  |  |
| --- | --- | --- |
| OBSERVATIONS AND RECORDS | | COMMENTS |
| ■ DONE  N/A | Visible emission observation(s) | S-8 was not in operation during inspection. G404 was in operation and not excess visible emissions were observed. |
| ■ DONE  N/A | Review of facility records and logs |  |
| DONE ■ N/A | Assessment of process parameters (feed rates, process rates, raw material compositions, etc.) |  |
| DONE ■ N/A | Assessment of control equipment performance parameters  (water flow rates, pressure drops, temperatures, ESP power levels, etc.) |  |
| DONE ■ N/A | Stack test observation(s) |  |
| DONE ■ N/A | Other : |  |
| DONE ■ N/A | Other : |  |

Inspection reports

(Compliance Monitoring Reports)

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| DATE OF INSPECTION | DATE OF INSPECTION REPORT | Full/ Partial  (F or P) | Investigative  (Yes or No) | Location of Inspection Report required Elements: | | | | | |
| Facility Info | Applicable requirements | list of EUs | Enforcement History | Compliance Activities | Findings & Recommendations |
| 8-6-13 | 8-7-13 | Initial Stack Test | N | ■EASIIR/  ARMS/  APDS | ■EASIIR/ARMS/  APDS | ■EASIIR/  ARMS/  APDS | ■  EASIIR/ARMS/  ACES | ■  EASIIR/ARMS/  ACES | ■  EASIIR/ARMS/  ACES |
| Paper Files | Paper Files | Paper Files | Paper Files | Paper Files | Paper Files |
| 11-9-11 | 11-9-11 | FCE | N | ■EASIIR/  ARMS/  APDS | ■EASIIR/ARMS/  APDS | ■EASIIR/  ARMS/  APDS | ■  EASIIR/ARMS/  ACES | ■  EASIIR/ARMS/  ACES | ■  EASIIR/ARMS/  ACES |
| Paper Files | Paper Files | Paper Files | Paper Files | Paper Files | Paper Files |
|  |  |  |  | EASIIR/  ARMS/  APDS | EASIIR/ARMS/  APDS | EASIIR/  ARMS/  APDS | EASIIR/ARMS/  ACES | EASIIR/ARMS/  ACES | EASIIR/ARMS/  ACES |
| Paper Files | Paper Files | Paper Files | Paper Files | Paper Files | Paper Files |

In-house tools with electronic report generation features: ARMS (Air Resource Management System) database; and

EASIIR (Electronic Access System for Inspection Information Retrieval)

Internet-accessible information: ACES (Air Compliance and Enforcement Search); and

APDS (Air Permit Documents Search)

**Comments**

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| Arrived onsite approximately 11:55 and met with Mr. Jeff Smith. EU001 was not in operation at the time. EU002 was in operation. Inquired about the way that the fuel use was being tracked and the way the 12 month totals were monitored. There is a fuel tank for each emission unit. The amount of fuel in the tank is measured every day, and the use for the day is calculated by comparison to the previous day. The ticket printout example for EU002 is attached. This data is entered into the district computer system daily. The fuel use reports are automatically generated for each emission unit by the system (see attached for example totals for the two EUs). Mr. Smith manually calculates the rolling 12 month total manually and compares to the limit for the Facility on a monthly basis.  The Catalytic Converter Temperatures are monitored by the CPMS on EU001 only, and only recorded when the temperatures reach 400 deg F, indicating that the engines are running, and every 15 minutes after that until the temperature falls back below 400 Deg. It is assumed that the engines cannot run at a temperature below 400 deg. I requested to see the maintenance logs, for the generators, and was shown the notebooks that detail the maintenance of auxiliary generators (see attached photos). I enquired about the Site Specific Monitoring Plan, and was informed that it is still being edited and will be submitted early 2014. Jeff also indicated that the new operating permit application to include the construction permit modifications would probably be submitted in March 2014. Left the facility at approximately 1:30. |

Prepared by: Scott D. Trainor Date: 12-16-2013

Reviewed by: Lee Hoefert Date: 12-16-2013