|  |  |  |  |
| --- | --- | --- | --- |
| ARMS ID  0112120 | OWNER/COMPANY  Wheelabrator North Broward, Inc. | | SITE NAME  Wheelabrator North Broward |
| **X** TITLE V | | SYNTHETIC MINOR  (Emissions limited to > 80% and < 100% of major source thresholds) | DATE OF THIS FCE: 07/23/2014  **X** ON-SITE ASSESSMENT  OFF-SITE ASSESSMENT  (Explain reason for Off-Site in ‘Comments’) |
| TITLE V MEGA-SITE\* | | OTHER: | DATE OF PREVIOUS FCE:08/30/2012 |

\*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

|  |  |  |
| --- | --- | --- |
| PERIODIC REPORTS | | COMMENTS |
| **X** DONE  N/A | Annual Operating |  |
| **X** DONE  N/A | Annual Statement of Compliance – Title V |  |
| **X** DONE  N/A | Title V Semi-Annual Monitoring |  |
| **X** DONE  N/A | Semi-Annual Compliance |  |
| **X** DONE  N/A | Quarterly Compliance |  |
| **X** DONE  N/A | Stack Test |  |
| **X** DONE  N/A | Visible Emissions Test |  |
| DONE  N/A | Other: |  |

|  |  |  |
| --- | --- | --- |
| CONTINUOUS EMISSION MONITOR REPORTS | | COMMENTS |
| **X** DONE  N/A | Quarterly excess emissions |  |
| **X** DONE  N/A | Semi-annual |  |
| **X** DONE  N/A | RATA |  |
| **X** DONE  N/A | CGA |  |
| **X** DONE  N/A | Other : Carbon Injection Feed | See comments below |
| DONE  N/A | Other : |  |

Observations and Records Review

|  |  |  |
| --- | --- | --- |
| OBSERVATIONS AND RECORDS | | COMMENTS |
| **X** DONE  N/A | Visible emission observation(s) |  |
| **X** DONE  N/A | Review of facility records and logs |  |
| **X** DONE  N/A | Assessment of process parameters (feed rates, process rates, raw material compositions, etc.) |  |
| **X** DONE  N/A | Assessment of control equipment performance parameters  (water flow rates, pressure drops, temperatures, ESP power levels, etc.) |  |
| **X** DONE  N/A | Stack test observation(s) | 03/20/2013, 06/05/2013, 09/11/2013, 09/26/2013, 12/11/201, 03/18/2014 |
| **X** DONE  N/A | Other : | Reviewed waste manifests for special wastes. |
| 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 |
| 03/30/2012 | 9/4/2012 | F | (FCE) | **X** EASIIR/  ARMS/  APDS | EASIIR/ARMS/  APDS | **X** EASIIR/  ARMS/  APDS | **X** EASIIR/ARMS/  ACES | **X** EASIIR/ARMS/  ACES | **X**  EASIIR/ARMS/  ACES |
| **X** Paper Files | **X** Paper Files | **X** Paper Files | **X** Paper Files | **X** Paper Files | **X** 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 |
|  |  |  |  | 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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| --- |
| Review of the carbon records shows that CEMS shows that a total of 17,170 lbs of carbon was injected into the units during a total of 2452 operating hours (U1-2115hrs/U2-214hrs/U3-123hrs) the second quarter of 2014. The total was based on the pumps injecting 7 lbs/hr. Inventory records show that only 8,620 lbs were consumed. This would indicate that only 3.5 lbs/hr. The last mercury test called for 5 lbs/hr. Historically, the facility has generally been about 75 percent below the 50 ug/m3 limitation. The system was installed as a precautionary measure following a onetime spike during a previous stack test. It is unlikely that there would have been any mercury exceedances during this time. In a follow up call with Chuck Faller, it appears that the problem is accurately measuring tonnage in the silo. The density is very inconsistent. The facility will continue to check the pumps on a quarterly basis to check that a known weight of carbon is fed through the pumps in a half hour. |

Prepared by: Lee C. Hoefert Date: August 7, 2014

Reviewed by: Lee C. Hoefert Date: August 7, 2014