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| 1030060 75626 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **FACILITY:** **Largo Wastewater Reclamation Facility** | | | | | | | | | | | | | | | | | | | | **PERMIT ID: 30** | | | | | | | | | | | | | | |
| **Largo Wastewater Reclamation Facility** | | | | | | | | | | | | | | | | | | | | **DISTRICT:** Southwest | | | | | | | | | | | | | | |
| **ADDRESS:** 5100 150th Avenue North | | | | | | | | | | | | | | | | | | | | **CONTACT PHONE:** | | | | | | | | | | | | | | |
| Clearwater, FL | | | | | | | | | | | | | | | | | | | | 727-518-3080 | | | | | | | | | | | | | | |
| **ARMS NO:**  **1030060 001** | | | | | | | | **PERMIT NO:** | | | | | | | | | | | | **Expiration Date:** 11/12/14  **Renewal Date:** 9/13/14 | | | | | | | | | | | | | | |
|  | | | | | | | | **1030060-008-AF** | | | | | | | | | | | |  | | | | | | | | | | | | | | |
|  | | | | | | | |  | | | | | | | | | | | | **Test Due Date:** **During each federal fiscal year (October 1st to September 30th)** | | | | | | | | | | | | | | |
| **EMISSION UNIT DESCRIPTION :** **Two Sewage Sludge Drying Trains: Emissions are controlled by a Settling Chamber, Fisher-Klosterman, Inc. Model MS-520 Cyclonic Separator, Venturi Scrubber, Huntington Energy System, Inc., Model 65 Regenerative Thermal Oxidizer AC allows new scrub/cyclone** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **CMS INSPECTION DATE:** | | | | | | | **ARMS INSPECTION TYPE:** | | | | | | | | | | | | | | | **COMPLIANCE STATUS:** | | | | | | | | | | | | |
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|  | **6/21/2011** | | | | |  |  | | | INS**1** | | **✓** | **INS2** |  | | INS**3** | |  | FUI | | | | **✓** | | **IN** |  | | MNC | | |  | | SNC | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| **INSPECTION TYPE:** | | | | **✓** | **Initial** | | | |  | | Re-inspection | | | |  | | Complaint | | | |  | | | Drive-by | | | |  | | Quarterly | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **✓** | | | **A. General Review:** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **1.** | | Permit File Review | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***C****omments: The Largo WWTP was issued a Federally Enforceable Operating Permit (FESOP) on 06/10/2011 whereas it previously had a Title V Permit.* | | | | | | | | | | | | | | | | | | | | | | | | |  | |  | | |  | |  |
| **2.** | | Introduction and Entry | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***C****omments: Mr. Richard Mushaben greeted me, answered my question throughout the inspection, provided operational material throughput logs, O & M Logs and gave me a tour of the facility.* | | | | | | | | | | | | | | | | | | | | | | | | |  | |  | | |  | |  |
| **3.** | | **Is the Responsible Official/Authorized Representative still: Gary R. Glascock?** | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***C****omments:*  **The Responsible Official/Authorized Representative’s e-mail is: gjonesgl@largo.com** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **4.** | | **Is the facility contact still:** Richard Mushaben**?** | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***C****omments:*  **The facility contact’s e-mail is: rmushabe@largo.com** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| **IN** | **MNC** | **SNC** | **B. Specific Conditions:** |
| --- | --- | --- | --- |
| **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓** |  |  | *Inspection Note: This permit revises Construction Permit 1030060-005-AC and replaces Title V Air Operation Permit 1030060-007-AV. The changes made to Permits 1030060-005-AC and 1030060-007-AV for EU 001 include the following:*   * *The facility designation is changed from Title V to synthetic non-Title V. The facility was previously designated as a Title V source solely because it was (and still is) subject to the requirements of a NESHAP regulation, i.e., 40 CFR 61, Subpart E, National Emission Standard for Mercury. However Florida Statutes, Section 403.0872(1)(e), was changed a few years ago. A facility is no longer subject to Title V permitting solely because it is subject to a NESHAP regulation.* * *Requirements associated with the Compliance Assurance Monitoring (CAM) Plan are removed because these requirements apply to Title V facilities only.* * *PM emissions limitations for EU Nos. 001, 005 and 006 are removed because these emissions limits were based on PM RACT requirements in Rules 62-296.711 and 62-296.712, F.A.C. However, these emissions units were permitted after May 30, 1988, therefore are not subject to the PM RACT requirements. The once every five year PM stack testing requirements for EU No. 001 is also removed.* * *Visible emissions limitations for EU Nos. 001, 005 and 006 remain the same (i.e., not to exceed 5%), but the rule basis is changed from Rule 62-296.712(2), F.A.C., to Rules 62-4.070(3) and 62-210.650, F.A.C., i.e., to provide reasonable assurance of proper operation and maintenance of control devices.* * *Details of the required Operation and Maintenance (O&M) Plans are removed from the permit, similar to other facilities in Pinellas County that are required to have an O&M Plan. The permittee will work directly with Pinellas County outside the permit.* * *ASTM Method D1391-78, one of the two odor testing methods allowed by the permit, is removed from the permit since this method was withdrawn in 1986.* * *VOC emissions limitations and the associated once every five year VOC stack testing requirements are removed from the permit. The VOC emissions limitations were not based on a rule requirement but due to odor complaints many years ago. With the RTO in operation, low VOC emissions demonstrated during compliance tests and good compliance history in recent years, it is reasonable to eliminate the VOC emissions limitations and the associated VOC testing requirements.* * *EU No. 003 (Pelletizer Building with Odor Control System No. 1) is removed from the permit. The facility has not used the odor control scrubbers since 1998 due to lack of odor complaints.*     **General Conditions [**62-4.160, F.A.C.]  8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:  a. A description of and cause of noncompliance; and  b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.  ***Comments****: There were no periods of non-compliance per Mr. Mushaben and no indications of non-compliance in the records that I examined.*    12. This permit or a copy thereof shall be kept at the work site of the permitted activity.  ***Comments****: A copy of the permit  was kept at the worksite.*    **Common Conditions** [Rule 62-296.320(4)(c), F.A.C.]  Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.  **Emissions and Controls**  2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]  **61.19 Circumvention.**  No owner or operator shall build, erect, install, or use any article machine, equipment, process, or method, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous dilutants to achieve compliance with a visible emissions standard, and the piecemeal carrying out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size.  ***Comments****: There were no devices, that I could see, being used to circumvent the air pollution control equipment.*    6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]  ***Comments****: The Largo WWTP does not use VOCS in its processes.*    7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]  ***Comments:*** *An upwind/downwind survey of the facility was conducted. The observed parameters were:*  *Downwind odor level detected- none; Wind direction - ENE Upwind odor level detected-none.*    9. Unconfined Particulate Emissions:  a. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.  b. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.  c. Reasonable precautions include the following:  (1) Paving and maintenance of roads, parking areas and yards.  (2) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.  (3) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.  (4) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.  (5) Landscaping or planting of vegetation.  (6) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.  (7) Confining abrasive blasting where possible.  (8) Enclosure or covering of conveyor systems.  ***Comments****: The facility grounds are completely sodded and paved. There were no signs of fugitive dust emissions anywhere inside or outside of the property.*    **Permit Administrative Requirements**  7 Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority. [Rule 62-210.370(3), F.A.C.]  ***Comments:*** *The Annual Operating Report for calendar year 2010 was submitted on 4/1/2011.*    8 Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to PCDEM (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit.  [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]  ***Comments****: I explained to Mr. Mushaben that the permit must be renewed on or before 9/13/14.*    **Facility-wide Specific Conditions**   1. General Pollutant Emission Limiting Standards - Objectionable Odor: No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "Objectionable Odor" is defined as any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.   [Rules 62-210.200 and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]  ***Comments****: There were no odors outside of the facility property. The odors inside the facility that could be attributed to the sludge drying operations were present at a level of 1 or less on the AQD odor scale.*    A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 61, Subpart E – National Emission Standard for Mercury and 40 CFR 61, Subpart A – National Emission Standards for Hazardous Air Pollutants, General Provisions; adopted and incorporated by reference in Rule 62-204.800(10), F.A.C., and attached to this permit.  40 CFR 61, Subpart E Applicable Provision References  § 61.50 Applicability.  § 61.51 Definitions.  § 61.52 Emission standard.  § 61.52(b)  § 61.53 Stack sampling.  § 61.53(d)  § 61.54 Sludge sampling.  § 61.55 Monitoring of emissions and operations.  § 61.55(a)  § 61.56 Delegation of authority.  [Rule 62-204.800(10), F.A.C.; 40 CFR 61, Subpart E]  ***Comments****: The EU has complied with 40 CFR 61.50 thru 56 above.*    **40 CFR 61, Subpart E – National Emission Standard for Mercury and 40 CFR 61**  **§ 61.52 Emission standard.**  (b) Emissions to the atmosphere from sludge incineration plants, sludge drying plants, or a combination of these that process wastewater treatment plant sludges shall not exceed 3.2 kg (7.1 lb) of mercury per 24-hour period.  **§ 61.53 Stack sampling.**  (d) Sludge incineration and drying plants  (1) Unless a waiver of emission testing is obtained under 40 CFR 61.13, each owner or operator of a source subject to the standard in 61.52(b) shall test emissions from that source. Such tests shall be conducted in accordance with the procedures set forth either in 51.53(d) or in 61.54.  (2) Method 101A in appendix B to this part shall be used to test emissions as follows:  (i) The test shall be performed within 90 days of the effective date of these regulations in the case of an existing source or a new source which has an initial startup date preceding the effective date.  (ii) The test shall be performed within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.  (3) The Administrator/Department shall be notified in writing at least 30 days prior to an emission test, so that he may at his option observe the test.  (4) Samples shall be taken over such a period or periods as are necessary to determine accurately the maximum emissions which will occur in a 24-hour period. No changes shall be made in the operation which would potentially increase emissions above the level determined by the most recent stack test, until the new emission level has been estimated by calculation and the results reported to the Administrator.  (5) All samples shall be analyzed and mercury emissions shall be determined within 30 days after the stack test. Each determination shall be reported to the Administrator by a registered letter dispatched within 15 calendar days following the date such determination is completed.  (6) Records of emission test results and other data needed to determine total emissions shall be retained at the source and shall be made available, for inspection by the Administrator, for a minimum of 2 years.  **§ 61.54 Sludge sampling.**  (a) As an alternative means for demonstrating compliance with 40 CFR 61.52(b), an owner or operator may use Method 105 of 40 CFR 61 Appendix B and the procedures specified in this section.  (1) A sludge test shall be conducted within 90 days of the effective date of these regulations in the case of an existing source or a new source which has an initial startup date preceding the effective date, or;  (2) A sludge test shall be conducted within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.  (b) The Administrator shall be notified at least 30 days prior to a sludge sampling test, so that he may at his option observe the test.  (c) Sludge shall be sampled according to paragraph (c)(1), sludge charging rate for the plant shall be determined according to paragraph (c)(2), and the sludge analysis shall be performed according to paragraph (c)(3) of this section.  (1) The sludge shall be sampled according to Method 105-Determination of Mercury in Wastewater Treatment Plant Sewage Sludges. A total of three composite samples shall be obtained within an operating period of 24 hours. When the 24-hour operating period is not continuous, the total sampling period shall not exceed 72 hours after the first grab sample is obtained. Samples shall not be exposed to any condition that may result in mercury contamination or loss.  (2) The maximum 24-hour period sludge incineration or drying rate shall be determined by use of a flow rate measurement device that can measure the mass rate of sludge charged to the incinerator or dryer with an accuracy of 5 percent over its operating range. Other methods of measuring sludge mass charging rates may be used if they have received prior approval by the Administrator.  (3) The sampling, handling, preparation, and analysis of sludge samples shall be accomplished according to Method 105 in 40 CFR 61 Appendix B of this part.  (d) The mercury emissions shall be determined by use of the following equation:    EHg = MQ Fsm(avg)/1000  where:  EHg=Mercury emissions, g/day.  M=Mercury concentration of sludge on a dry solids basis, g/g.  Q=Sludge changing rate, kg/day.  Fsm=Weight fraction of solids in the collected sludge after mixing.  1000=Conversion factor, kg g/g2.  (e) No changes in the operation of a plant shall be made after a sludge test has been conducted which would potentially increase emissions above the level determined by the most recent sludge test, until the new emission level has been estimated by calculation and the results reported to the Administrator.  (f) All sludge samples shall be analyzed for mercury content within 30 days after the sludge sample is collected. Each determination shall be reported to the Administrator by a registered letter dispatched within 15 calendar days following the date such determination is completed.  (g) Records of sludge sampling, charging rate determination and other data needed to determine mercury content of wastewater treatment plant sludges shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2 years.  ***Comments****: The last test on June 22, 2010 determined that Mercury (Hg) was present at a level of 14 grams/24 hour period. Test methods used were conducted in compliance with the procedures set forth either in 51.53(d) or in 61.54.*    **§ 61.55 Monitoring of emissions and operations.**  (a) Wastewater treatment plant sludge incineration and drying plants. All the sources for which mercury emissions exceed 1.6 kg (3.5 lb) per 24-hour period, demonstrated either by stack sampling according to Sec. 61.53 or sludge sampling according to Sec. 61.54, shall monitor mercury emissions at intervals of at least once per year by use of Method 105 of Appendix B or the procedures specified in Sec. 61.53(d) (2) and (4). The results of monitoring shall be reported and retained according to Sec. 61.53(d)(5) and (6) or Sec. 61.54(f) and (g).  ***Comments****: Mercury Emissions at the Largo WWTP do not exceed 3.5 lbs per 24 hour period, therefore this condition does not apply.*    **40 CFR 61, Subpart A - General Provisions**  **§ 61.05 Prohibited activities.**  (a) After the effective date of any standard, no owner or operator shall construct or modify any stationary source subject to that standard without first obtaining written approval from the Administrator in accordance with this subpart, except under an exemption granted by the President under section 112(c)(2) of the Act. Sources, the construction or modification of which commenced after the publication date of the standards proposed to be applicable to the sources, are subject to this prohibition.  (b) After the effective date of any standard, no owner or operator shall operate a new stationary source subject to that standard in violation of the standard, except under an exemption granted by the President under section 112(c)(2) of the Act.  (d) No owner or operator subject to the provisions of this part shall fail to report, revise reports, or report source test results as required under this part.  ***Comments****: There have been no modifications or new construction at the Largo WWTP. All tests performed have been submitted as required by this subpart.*    **§ 61.07 Application for approval of construction or modification.**  (a) The owner or operator shall submit to the Administrator an application for approval of the construction of any new source or modification of any existing source. The application shall be submitted before the construction or modification is planned to commence, or within 30 days after the effective date if the construction or modification had commenced before the effective date and initial startup has not occurred. A separate application shall be submitted for each stationary source. (*inspection note: refer to full permit for full list of information needed to be provided in the event of modification and/or construction)*  ***Comments****: No new construction applications have been submitted after the issuance of this permit.*    A.2. Permitted Capacity: The total sludge input rate for each dryer shall not exceed 32,680 pounds per hour daily average.  [Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030060-005-AC]  ***Comments****: The sludge rate throughput daily average based on monthly data was 32,680 lbs per day.*    A.3. Authorized Fuel: The sludge dryers and afterburner shall be only fired with natural gas.  [Rule 62-210.200(PTE), F.A.C. Construction Permit 1030060-005-AC]  ***Comments****: The sludge dryers and afterburner use only Natural Gas.*    A.4. Heat Input Limitation: The heat input for each drying train (including dryer and afterburner) shall not exceed 14.2 MMBTU per hour daily average.  [Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030060-005-AC]  ***Comments****: The highest MMBTU per hour (based on one day’s usage) was 4.93 MMBTU/hr.*    A.5. Operation Limitation: Only one drying train may operate at any one time.  [Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030060-005-AC]  ***Comments****: The sludge drying trains were not operating at the time of my inspection. However, Mr. Mushaben stated that he was well aware of the limitation that only one train may operate at the same time.*    A.7. Mercury Emissions Standard: Mercury emissions shall not exceed 3200 grams per 24-hour period. [40 CFR 61.52(b), Construction Permit 1030060-005-AC]  A.9. Compliance Tests: During each federal fiscal year (October 1st to September 30th), each sludge drying train shall be tested for odor and visible emissions. Between 120 days and 180 days prior to the expiration date of this permit, one of the two drying trains shall be tested for mercury emissions. If the mercury emissions test shows mercury emissions exceed 1600 g per 24-hour period, demonstrated either by stack sampling according to 40 CFR 61.53 or sludge sampling according to 40 CFR 61.54, the permittee shall monitor mercury emissions at intervals of at least once per year by use of EPA Method 105 or the procedures specified in 40 CFR 61.53(d) (2) and (4). The results of monitoring shall be reported and retained according to 40 CFR 61.53(d)(5) and (6) or 40 CFR 61.54(f) and (g).  [Rule 62-297.310, F.A.C.; 40 CFR 61.55(a)]  ***Comments****: Mercury Emissions were 14 grams/24 hour period during the last stack test on June 22nd 2010.*    A.8. Visible Emissions Limitation: In order to provide reasonable assurance of proper operation and maintenance of the pollution control devices, visible emissions from the afterburner shall not exceed 5% opacity. [Rules 62-4.070(3) and 62-210.650, F.A.C.]  ***Comments****: The EU was not operating at the time of my inspection.*    A.10. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310, F.A.C.]  A.11. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).   | Method(s) | Description of Method and Comments | | --- | --- | | EPA Method 101A  or  EPA Method 105 | Determination of Particulate and Gaseous Mercury Emissions from Sewage Sludge Incinerators  Determination of Mercury in Wastewater Treatment Plant Sewage Sludges | | EPA Method 9 | Visual Determination of the Opacity of Emissions from Stationary Sources | | ASTM Method  E679-04 or more recent version | Standard Practice for Determination of Odor and Taste Thresholds by a Forced-Choice Ascending Concentration Series Method of Limits |   [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 61.53 and 61.54; Appendix A of 40 CFR 60; and Appendix B of 40 CFR 61]  ***Comments****: Testing was not being performed during this inspection.*    A.12. Afterburner Monitoring Requirements: When drying sewage sludge, the afterburner shall operate at a minimum temperature of 1100 °F and a minimum gas residence time of 1.0 second. The permittee shall operate adequate instrumentation to continuously monitor and record the afterburner's operating temperature. [Rule 62-4.070(3), F.A.C.; Construction Permit 1030060-005-AC]  ***Comments****: The afterburner temperature during the last test was 1,166oF.*    A.13. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility’s contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]  ***Comments****: I read the permit condition to Mr. Mushaben.*    A.14. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. All test reports submitted to the Department and PCAQD shall include, at a minimum, the following information for the test period:   * Sludge input rate (tons/hr.) to the dryer. * Total heat input rate (MMBTU/hr.). * Copies of the dryer's records indicating the sludge input rate. * Copies of the afterburner's continuous temperature chart recorder. * Calculations of the afterburner's gas residence time. * Control device operating parameters, such as scrubber flow rate and pressure drop. * Failure to submit the above information or operating at conditions which do not reflect normal operating conditions may invalidate the test and fail to provide reasonable assurance of compliance.   [Rule 62-297.310(8), F.A.C.; Construction Permit 1030060-005-AC]  ***Comments****: The June 22nd, 2010 stack results submittal were in compliance with the requirements of this permit condition.*    A.15. Sludge Input Rate Determination and Recordkeeping: The total sludge input rate of each dryer shall be determined by the following:  M = C (%R - %C)  (%R - %M)  Where: M = Dryer Total Sludge Input Rate (lbs./hr.)  C = Wet Sludge Feed Cake to Pugmill (lbs./hr.)  %M = Percent Solids of Dryer Input (Feed)  %C = Percent Solids of Wet Sludge Feed Cake  %R = Percent Solids of Recycled Dry Material to Pugmill  a. Continuously monitor and record hourly the wet sludge feed cake to the pugmill.  b. Perform dry solids tests every two hours on the dryer feed, the wet sludge feed cake, and recycled dry material.  c. At the end of each day, the average for each of the above measurements will be applied to the formula above and the dryer input (feed) rate calculation will be completed.  The above procedure will provide a daily average dryer input (feed) rate. This procedure will be used each day of operation and will be used during compliance testing where the calculations will be completed and reported for the actual period of the test and not the entire operating day.  [Construction Permit 1030060-005-AC]  ***Comments****: I “followed” the spreadsheet calculations from cel to cel and verified that the equations above are being used for Sludge Input Rate Determination and Recordkeeping.*    A.16. Natural Gas Heat Input Rate Records: The total maximum natural gas heat input rate (MMBTU/hr.) of each drying train (dryer + afterburner) shall be determined by the afterburner and the dryer burner gas meters. The permittee shall maintain records of the dryer hours of operation and the amount of gas fired in the dryers and afterburner daily. Records shall also be maintained (for comparison purposes) of the main gas meter. [Construction Permit 1030060-005-AC]  ***Comments****: The Natural Gas Usage records were available and are attached.*    A.17. Operation and Maintenance (O & M) Plan: This emissions unit includes the following pollution control devices:   1. Fisher-Klosterman Model XQ Series XQ340-27 Dual Cyclones for each sludge drying train 2. Fisher-Klosterman Model MS-650H venturi scrubber with cyclonic separator for each sludge drying train 3. Huntington Energy System, Inc., Model #65 regenerative afterburner shared by both sludge drying trains.   For each control device listed above, the permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection the control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained at the facility for a minimum of two (2) years and shall be made available to the Compliance Authority upon request. The O&M Plan may be amended with the prior approval of the Compliance Authority. At a minimum, the O&M Plan shall include:   1. The operating parameters of the pollution control device. 2. Timetable for the routine maintenance of the pollution control device as specified by the manufacturer. 3. Timetable for routine periodic observations of the pollution control device sufficient to ensure proper operations. 4. A list of the type and quantity of the required spare parts for the pollution control device, which are stored on the premises of the permit applicant. 5. A record log which will indicate, at a minimum: 6. When maintenance and observations were performed; 7. What maintenance and observations were performed; 8. Who performed said maintenance and observations; and 9. Acceptable parameter ranges for each operational check.   [Rule 62-4.070(3), F.A.C. and Pinellas County Code, Section 58-128(a)]  ***Comments****: The facility had on hand and I reviewed the O & M Logs which showed compliance with items a. thru c. above.* |
| **✓** |  |  | Valid Permit [Rule 62-210.300] |
| **✓** |  |  | Changes to Facility/emission unit [Rule 62-210.300] *Does the emission unit description above match what the facility is operating.  Yes  No*  **C**omments: |

| **✓** | | **C. Other:** | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Pollution Prevention Activities**   * P2 Handouts Provided:  P2 Brochure;  P2 Manual;  P2 Checklist * Have any emissions reductions occurred  *Yes /*  *No*   Chemical Substitution;  Equipment Changes;  Process Changes  Chemical/Material Reuse; On-site Recycling;  Other:  ***Comments:*** *No emissions reductions have occurred.* | | | | | | | |
| Closing Conference: *I informed Mr. Mushaben that the facility was in compliance with applicable rules and permit conditions.* | | | | | | | |
| **Inspector(s)**: Jose Rodriguez, *Pinellas County, Air Quality Division* | | | | | | | |
| **Signature(s)**: Date: | | | | | | | **Date: July 18, 2011** |
| ACCESS? | | **✓** | EASIIR? | **✓** |

|  |  |  |  |
| --- | --- | --- | --- |
| AIRS ID  1030060 | OWNER  Largo Wastewater Reclamation Facility | | FACILITY NAME  Largo Wastewater Reclamation Facility |
| TITLE V | | SYNTHETIC MINOR | DATE OF THIS FCE  **7/18/2011** |
| TITLE V MEGA-SITE\* | | OTHER **FESOP** | DATE OF LAST FCE  **9/22/2009** |

\*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 |
| DONE  N/A | Annual operating report |  |
| DONE  N/A | Statement of compliance |  |
| DONE  N/A | Annual |  |
| DONE  N/A | Semi-annual |  |
| DONE  N/A | Quarterly |  |
| DONE  N/A | Other : |  |
| 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 : |  |

Assessment of Control Device and Process Operating Conditions

|  |  |
| --- | --- |
| OFF-SITE ASSESSMENT | (Describe the off-site assessment in comments) |
| ON-SITE ASSESSMENT | (Document the on-site inspection below) |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| DATE OF INSPECTION | DATE OF INSPECTION REPORT | My office maintains the inspection report... | | |
| ...in the ARMS database through EASIIR. | ...with the paper or electronic compliance files | ...in another location (specify). |
| 6/21/2011 | 7/19/2011 |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| COMMENTS | | | | |

Review of Tests and Records

|  |  |  |
| --- | --- | --- |
| TESTS, OBSERVATIONS AND RECORDS | | COMMENTS |
| DONE  N/A | Visible emission observation(s) |  |
| 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(s) |  |
| DONE  N/A | Other : |  |
| DONE  N/A | Other : |  |

Compliance Monitoring (CM) Information

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| CM ELEMENT | My office maintains this information... | | | |
| ...electronically, in the ARMS database. | ...in the permit. | ...in the inspection report. | ...in another location (specify). |
| Facility information |  |  |  |  |
| Applicable requirements |  |  |  |  |
| Inventory of emission units |  |  |  |  |
| Enforcement history |  |  |  |  |
| Compliance activities |  |  |  |  |
| Findings and recommendations |  |  |  |  |
| COMMENTS | | | | |

Other Comments

|  |
| --- |
|  |

Prepared by: Jose Rodriguez Date: 7/18/2011

Reviewed by: Date:

1. Complete the form as much as possible during for inspection; 2. The remainder of checklist, for activities in the FY, are filled in no later than 9/15; 3. Between 9/15 and 9/30, complete the FCE by closing out the FCS project in ARMS. The INSP > FCS record only accepts a completion date and a comment; it does not accept information on the lower portion of the form.  If an FCS project already exists for the fiscal year in question, enter a completion date and comment in the existing record, do not create a duplicate FCS record.