|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1030060 75628 | | | | | | | | | | | | | | | | | | | | |  | | | | | | | | | | | | | |
| **FACILITY:** **Largo Wastewater Reclamation Facility** | | | | | | | | | | | | | | | | | | | | | **PERMIT ID: 32** | | | | | | | | | | | | | |
| **Largo Wastewater Reclamation Facility** | | | | | | | | | | | | | | | | | | | | | **DISTRICT:** Southwest | | | | | | | | | | | | | |
| **ADDRESS:** 5100 150th Avenue North | | | | | | | | | | | | | | | | | | | | | **CONTACT PHONE:** | | | | | | | | | | | | | |
| Clearwater, FL | | | | | | | | | | | | | | | | | | | | | 727-518-3080 | | | | | | | | | | | | | |
| **ARMS NO:**  **1030060 005** | | | | | | | | | **PERMIT NO:** | | | | | | | | | | | | **Expiration Date:** 11/12/14  **Renewal Date:** 9/13/14 | | | | | | | | | | | | | |
|  | | | | | | | | | **1030060-008-AF** | | | | | | | | | | | |  | | | | | | | | | | | | | |
|  | | | | | | | | |  | | | | | | | | | | | | **Test Due Date:** | | | | | | | | | | | | | |
| **EMISSION UNIT DESCRIPTION :** **Two Sludge Storage Silos with emissions controlled by a common American Air Filter, Millennium 8-96-1015, dust collector system** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **INSPECTION DATE:** | | | | | | | | **ARMS INSPECTION TYPE:** | | | | | | | | | | | | | | **COMPLIANCE STATUS:** | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  | | **6/21/2011** | | | | |  |  | | | INS**1** | | **✓** | **INS2** |  | | INS**3** | |  | FUI | | | **✓** | | **IN** |  | MNC | | | |  | | SNC | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **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 005 include the following:*   * *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.*     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.*    B.1. Permitted Capacity:   1. The dried sludge loading rate for each silo shall not exceed 1.0 tons per hour daily average and only one (1) silo may be loaded at any one time. 2. The loading rate for the truck loading operation shall not exceed 25.6 tons per hour of dried sludge daily average.   [Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030060-005-AC]  ***Comments****: a. The highest Silo Loading Rate was 0.38 tons/hr, recorded on January 20th, 2011.*  *b. The highest Truck Loading Rate was 21.215 tons/hr, which occurred on 15 June 2011.*    B.3. Visible Emissions Limitation: In order to provide reasonable assurance of proper operation and maintenance of the common baghouse, visible emissions from the baghouse shall not exceed 5% opacity.  [Rules 62-4.070(3) and 62-210.650, F.A.C.]  ***Comments****: The Silos were not being loaded at the time of my inspection.*    B.4. Visible Emission Testing Requirement: The permittee shall test the common baghouse for visible emissions annually during each federal fiscal year (October 1 – September 30).  [Rule 62-297.310(7)(a), F.A.C. Construction Permit 1030060-005-AC]  ***Comments****: Baghouse Visible Emissions on 4/15/2010 were determined to be 0.0% Opacity.*    B.5. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. In addition, testing of the common baghouse shall be conducted when one of the silos is being loaded and a truck is being loaded simultaneously within 90-100% of their associated permitted capacity (See Specific Condition No. C.1.).  [Rules 62-4.070(3) and 62-297.310, F.A.C.; Construction Permit 1030060-005-AC]  ***Comments****: The Truck Loading was conducted on 4/15/2010 and Opacity was determined to be 0.0%.*    B.6. Test Method: Required tests shall be performed in accordance with the following reference method.   | **Method(s)** | **Description of Method and Comments** | | --- | --- | | 9 | Visual Determination of the Opacity of Emissions from Stationary Sources |   [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]  ***Comments****: Method 9 was used in the determination of Opacities for the Baghouse and Truck Loading reported above.*    B.7. 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****: The facility was in compliance with the 15 day, minimum, prior notification requirement.*    B.8. 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. [Rule 62-297.310(8), F.A.C.]  ***Comments****: The test reports were submitted in a timely manner and contained all of the information required by rule and permit conditions.*    B.9. Operation Recordkeeping Requirements: In order to document compliance with the requirements of Condition B.1., the permittee shall maintain daily records of the following:  a. The dried sludge loading rate for each silo. The dried sludge loading rate for each silo is determined from the following equation:  P = C x (C%)  R%  Where: P = Silo Sludge Loading Rate (tons/hr.)  C = Total Wet Sludge Reed Cake to Pugmill (tons/hr.)  C% = Percent Solids of Wet Sludge Feed Cake to Pugmill  R% = Percent Solids of Sludge to Silos  b. The truck loading rate.  c. The hours of operation for the sludge storage silos and truck loading area.  Daily records shall be completed with five (5) business days and kept at the facility in a permanent form suitable for inspection by the Department or PCAQD.  [Rule 62-4.070(3), F.A.C. Construction Permit 1030060-005-AC]  ***Comments****: I inspected the electronic spreadsheet which contains the material throughput records. I followed the formulas from cel to cel from beginning to end for several calculations and found them to be in compliance with a. thru c. above.*    B.10. Operation and Maintenance (O & M) Plan for PM Control: The permittee shall maintain and implement an O & M Plan for the common baghouse to include a schedule for the maintenance and inspection of the baghouse, 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****: I examined the O & M Logs. The Largo WWTP was maintaining the O & M Logs as required by a. thru e. 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: *No materials, processes or equipment were added or modified per Mr. Mushaben, and none that I could see.* | | | | | |
| ✓ | | | **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:*** *NA* | | | | | | | | | |
| 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? | **✓** |