

## STATEMENT OF BASIS

Title V Air Operation Permit Renewal  
Permit No. 0310358-020-AV

### APPLICANT

The applicant for this project is the City of Jacksonville. The applicant's responsible official and mailing address are: Ms. Nina Sickler, Director, City of Jacksonville, Trail Ridge Landfill, 214 North Hogan Street, Jacksonville, Florida 32202.

### FACILITY DESCRIPTION

The applicant operates the existing Trail Ridge Landfill, which is located in Duval County at 5110 US Highway 301, Jacksonville, Florida.

Trail Ridge Landfill is a Class I municipal solid waste landfill owned by the City of Jacksonville and operated by Waste Management, Inc.

The landfill currently consists of 176 acres which commenced construction in 1992. It receives approximately 2,500 to 3,000 tons of waste daily; has a total site area of 977 acres of land; and, currently has a 427 acre "footprint". The landfill serves both residential and commercial customers.

Landfill gas produced from the decomposition of disposed waste is collected from both active and capped cells by an active gas recovery system at the landfill. The collected gas is either transferred to Trail Ridge Energy where it is treated and used as fuel to power six internal combustion engines to produce electricity; or, it is combusted by Trail Ridge Landfill in a 5,000 standard cubic feet per minute (scfm) open flare.

The facility also has two Cummins diesel powered emergency generators.

The emissions from City of Jacksonville Trail Ridge Landfill and Trail Ridge Energy, LLC, Trail Ridge RNG Project (AIRS ID 0310654) are to be aggregated for PSD and Title V determinations.

This facility also includes miscellaneous insignificant emissions units and/or activities.

### REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Municipal Solid Waste Landfill
010	5,000 SCFM Open, Non-assisted Utility Flare
016	Emergency Diesel Generator
017	Emergency Diesel Generator

### APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on April 10, 2024, this facility is a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS General Provisions	001, 010
40 CFR 60, Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014	001, 010

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Regulation	EU No(s.)
40 CFR 61, NESHAP Subpart A – General Provisions	001
40 CFR 61, NESHAP Subpart M – National Emission Standard for Asbestos	001
40 CFR 63, NESHAP Subpart A – General Provisions	001, 010, 016, 017
40 CFR 63, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.	001, 010
40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	016, 017
<i>State Rule Citations</i>	
Rule 62-4, Florida Administrative Code (F.A.C.) (Permitting Requirements)	001, 010, 016, 017
Rule 62-204, F.A.C. (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference)	001, 010, 016, 017
Rule 62-210, F.A.C. (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms)	001, 010, 016, 017
Rule 62-213, F.A.C. (Title V Air Operation Permits for Major Sources of Air Pollution)	001, 010, 016, 017
Rule 62-297, F.A.C. (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures)	001, 010, 016, 017
<i>Local Rule Citations</i>	
City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice]; JEPB Rule 2, Parts I through VII, and Parts IX through XIV	001, 010, 016, 017

### PROJECT DESCRIPTION

The purpose of this permitting project is to renew the Title V permit for the above referenced facility.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Title V Air Operation Permit 0310358-016-AV issued **November 26, 2019**

Title V Air Operation Permit 0310358-017-AV issued **January 20, 2021**

Application for a Title V Air Operation Permit Renewal received **April 10, 2024**

Additional Information Request dated **June 5, 2024**

Additional Information Response received **November 26, 2024**

### PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 4953 – Refuse Systems.

North American Industry Classification System (NAICS): 562212 – Solid Waste Landfill.

HAP: The facility **is** identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility **does not** operate units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility **is** a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility **is** a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

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NSPS: The facility **operates** units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility **operates** units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 61.

NESHAP: The facility **operates** units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility. CAM applies to emissions units that have pre-control emissions of greater than 100 tons, are subject to an emissions limit and must use a control device to meet that emissions limit. The facility operates a 5,000 scfm non-assisted utility flare with no identified pre-controlled pollutant emissions above a Title V pollutant major source level.

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

### PROJECT REVIEW

Changes to the permit made as part of this renewal are discussed below:

1. All rule citations for 40 CFR 60, Subpart WWW were removed throughout the permit since Subpart WWW is no longer applicable to the facility.
2. 40 CFR 63 subpart AAAA was substantially modified on March 26, 2020. The updates are reflected in this permit.
3. Appendix LR is updated with the most recent Jacksonville Environmental Protection Board, Rule 2, executed on June 17, 2024.
4. On August 30, 2024, EPA issued a final rule: **National Emission Standards for Hazardous Air Pollutants (NESHAP): Reciprocating Internal Combustion Engines (RICE) and New Source Performance Standards (NSPS): Internal Combustion Engines; Electronic Reporting**. This action finalized EPA amendments to the RICE NESHAP, the NSPS for Stationary Compression Ignition Internal Combustion Engines, and the NSPS for Stationary Spark Ignition Internal Combustion Engines, to add electronic reporting provisions. EPA also finalized a small number of clarifications and corrections to provide clarification and correct inadvertent and other minor errors in the Code of Federal Regulations, particularly related to tables.

The appendices have been updated to reflect amendment to 40 CFR 63 Subpart ZZZZ.

5. Specific Conditions D.1, D.2. (renumbered to C.1 and C.2), D.3. (removed), D.5, D.6., D.7., D.9. (renumbered to C.5., C.6., C.7, C.9.) are revised, and a new Specific Condition C.8. is added as follows based on the amendment to 40 CFR 63 Subpart ZZZZ, and to reflect the applicable requirements for emergency use engines located at a major source of HAP emissions for Emission Units 016 and 017:

**C.1. Engine Startup.** During periods of startup the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for the appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. [Rule 62-204.800(11), F.A.C.; Rule 2.201, JEPB; and, 40 CFR 63.6625(h); Table 2.c.1.]

**C.2. Work or Management Practice Standards.**

- a. *Oil.* Change oil and filter every 500 hours of operation or annually 1 year + 30 days of the previous change, whichever comes first. Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement.
- b. *Air Cleaner.* Inspect air cleaner every 1,000 hours of operation or annually 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

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- c. *Hoses and Belts.* Inspect all hoses and belts every 500 hours of operation or annually 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary. Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.
- d. *Operation and Maintenance.* Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related operation and maintenance written instructions or develop and follow your own maintenance plan which shall provide, to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- e. *Oil Analysis.* The permittee has the option of using oil analysis program in order to extend the specified oil and filter change requirement in Specific Condition a. above. The oil analysis shall be performed at the same frequency specified for changing the oil and filter in Specific Condition a. above. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent of water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent of water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine permittee is not required to change the oil and filter. If any of the limits are exceeded, the engine permittee shall change the oil and filter within two business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine permittee shall change the oil and filter within two business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil and filter changes for the engine. The analysis program shall be part of the maintenance plan for the engine.

[Rules 62-204.800(11), F.A.C.; Rule 2.201, JEPB; 40 CFR 63.6603(a) 63.6602, 40 CFR 63.6625(e)(2) & (i), 40 CFR 63.6640(a), Tables 6.9.a. & 2d4.a.2c.1.]

**D.3. Operation and Maintenance.** The permittee of an existing emergency or black start stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[Rule 62-204.800(11), F.A.C.; 40 CFR 63.6625(e)(2); and Rule 2.201, JEPB]

### C.5. Demonstration of Continuous Compliance.

- a. The permittee shall demonstrate continuous compliance with each emission limitation and operating limitation in Table 2d 2c to 40 CFR 63, Subpart ZZZZ that applies according to methods specified in Table 6 of 40 CFR 63 Subpart ZZZZ.
- b. The permittee shall report each instance in which they did not meet each emission limitation or operating limitation in Table 2d 2c to 40 CFR 63 Subpart ZZZZ that applies. These instances are deviations from the emission and operating limitations in 40 CFR 63 Subpart ZZZZ. These deviations shall be reported according to the requirements in 40 CFR 63.6650. If the catalyst is changed, the permittee shall reestablish the values of the operating parameters measured during the initial performance test. When the operating parameters values are reestablished, the permittee shall also conduct a performance test to demonstrate that the required emission limitation applicable to the stationary RICE is being met.
- c. The permittee shall also report each instance in which the requirements in Table 8 to 40 CFR 63 Subpart ZZZ that apply were not met.

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d. The permittee shall operate the emergency stationary RICE according to the requirements in **paragraphs (1) through (3) below**. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, **emergency demand response**, and operation in non-emergency situations for 50 hours per year, as described in **paragraphs (1) through (3) below**, is prohibited. If the permittee does not operate the engine according to the requirements in **paragraphs (1) through (3) below**, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and shall meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) Emergency stationary RICE may be operated for maintenance checks and readiness testing as specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) below counts as part of the 100 hours per calendar year allowed by this paragraph.

Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing **and emergency demand response** provided in **paragraph (2) above** of this specific condition. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[Rule 62-204.800(11), F.A.C.; Rule 2.201, JEPB; and 40 CFR 63.6640(a), (b), (e) & (f)(1), (2)(i), & (3)]

### **Recordkeeping and Reporting Requirements**

**C.6. Recordkeeping.** The permittee shall keep the following records:

- a. A copy of each notification and report submitted to comply with 40 CFR 63 Subpart ZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv) (See NESHAP Subpart A, General Provisions).
- b. Records of the occurrence and duration (in hours) of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- c. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii) (See NESHAP Subpart A, General Provisions).
- d. Records of all required maintenance performed on the air pollution control and monitoring equipment.
- e. Records of actions taken during periods of malfunction to minimize emissions in accordance with **Specific Condition No. C.4.b. above**, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- f. Records required in Table 6 of 40 CFR 63 Subpart ZZZ to show continuous compliance with each emission or operating limitation that applies.

[Rule 62-204.800(11), F.A.C.; Rule 2.201, JEPB; and 40 CFR 63.6655(a)(1)-(5), (d)]

**C.7. Maintenance Records.** The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that it and after-treatment control device (if any) is operated and

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maintained according to their own maintenance plan. [Rule 62-204.800(11), F.A.C.; Rule 2.201, JEPB; and 40 CFR 63.6655(e),(e)(2)]

**C.8. Hours of Operation Records.** The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [Rule 62-204.800(11), F.A.C.; Rule 2.201, JEPB; and 40 CFR 63.6655(f), (f)(1)]

**C.9. Reporting.** If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. [Rule 62-204.800(11), F.A.C.; 40 CFR 63.6603(a) & Table 2d footnote 2; and Rule 2.201, JEPB] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of 40 CFR 63 Subpart ZZZZ, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, state or local law under which the risk was deemed unacceptable.

[Rule 62-204.800(11), F.A.C.; Rule 2.201, JEPB; and 40 CFR 63.6602 & Table 2c footnote 1]

6. In the correspondence dated November 26, 2024, the facility requested that Appendix I of the current Title V permit be revised by removing the portable 125 horsepower generator at the borrow pit. This generator was used to power the pump(s) for dewatering the borrow pits and other ancillary items but has been replaced by a dedicated electrical power line service. The generator no longer exists at the facility.

Appendix I is revised as requested in the renewal draft permit.

7. In the correspondence dated November 26, 2024, the facility requested that Appendix I of the current Title V permit be revised by renaming the Two (2) generators for lighting" to "Two (2) non-road, portable diesel-powered light towers". Each unit has a trailer coupler/wheels and is moved around the site frequently for operations near the active working face of the landfill (i.e., each unit will not be stationary at one location on-site for a period of more than 12 months). The facility asserts each associated diesel engine meets the definitions under the Clean Air Act such that each light tower engine would not be considered stationary and meets the definition of a nonroad, portable engine. As such, the engines are not subject to 40 CFR 60 Subpart III and 40 CFR 63 Subpart ZZZZ. Information for each light tower, as provided by the facility, is summarized below:

1. Make: Allmand  
Model: Night-Lite Series  
Year: 2021  
Engine Make: CAT/Perkins  
Engine Model: 1.1  
Power: 13.8 HP (at 1800 RPM)  
Displacement: 1.1 Liters

Engine Tier: Tier 4 Final  
2. Make: Generac  
Model: MLT360MV-STD2  
Year: 2018  
Engine Make: Kubota  
Engine Model: D1005-BG-EF02  
Power: 10.6 kW or 14.2 HP (at 1800 RPM)

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Displacement: 1.0 Liter

Engine Tier: Tier 4

The facility estimated the maximum potential emissions associated with operation of both diesel-powered engines using conservative operations data and the applicable emissions limits for Tier 4 rated engines. Maximum potential emissions of the criteria pollutants are less than the 5.0 tons per year threshold (per pollutant) for the generic permitting exemption in Rule 62-210.300(3)(b)1.c., F.A.C.

Appendix I is revised as follows in the renewal draft permit:

**Two (2) generators (9 and 12 HP) for lighting\*\***

**\*\*All generators are diesel, and the collective annual fuel use is less than 32,000 gallons of diesel fuel**

**Two (2) non-road, portable diesel-powered light towers. [Non-road engines per 40 CFR 1068.30, not a stationary internal combustion engine per 40 CFR 60, Subpart IIII (40 CFR 60.4219) or a stationary reciprocating internal combustion engine per 40 CFR 63, Subpart ZZZZ (40 CFR 63.6675), Rule 62-210.300(3)(b)1.c., F.A.C.]**

<u>Unit Identification</u>	<u>Engine Brake HP</u>	<u>Model Year</u>	<u>Displacement liters</u>	<u>Engine Manufacturer</u>	<u>Model No.</u>	<u>Fuel</u>	<u>Engine Tier</u>
<u>Allmand Model: Night-Light Series</u>	<u>13.8 (at 1800 RPM)</u>	<u>2021</u>	<u>1.1</u>	<u>CAT/Perkins</u>	<u>1.1</u>	<u>Diesel</u>	<u>Tier 4 Final</u>
<u>Generac Model: MLT360MV-STD2</u>	<u>14.2 HP (at 1800 RPM), 10.6 kW</u>	<u>2018</u>	<u>1.0</u>	<u>Kubota</u>	<u>D1005-BGEF02</u>	<u>Diesel</u>	<u>Tier 4</u>

8. In the correspondence dated November 26, 2024, the facility requested that the Title V permit be administratively separated into two Title V permits between the City of Jacksonville and Trail Ridge Energy, LLC. A Notification of Responsible Official for Trail Ridge Energy, LLC was provided. The emission units and insignificant Activities should be separated as follows:

**Owner:** City of Jacksonville

**Site Name:** Trail Ridge Landfill (Air Facility ID No. 0310358)

1. Regulated Emission Units

- a. EU 001 – Municipal Solid Waste Landfill
- b. EU 010 – 5,000 SCFM Open, Non-assisted Utility Flare
- c. EU 016 – Emergency Diesel Generator (Scalehouse)
- d. EU 017 – Emergency Diesel Generator (Shop)
- e. Construction currently permitted under Air Quality Permit No. 0310358-019-AC.

A Title V Air Operation Permit revision application will be submitted for these two units within 180 days after completing the required work and commencing operation, including initial compliance testing.

- i. EU 018 – 3,600 SCFM Enclosed Flare
- ii. EU 019 – 45,000 GPD Leachate Evaporator

2. Insignificant Activities

- a. Fugitive VOC and HAP emissions from leachate storage tanks (6 – 22,000-gallon tanks)

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- b. VOC emissions from 550-gallon gasoline storage tank
- c. Aggregate handling and storage piles
- d. Yard trash mulching program
- e. Two (2) non-road, portable diesel-powered light towers
- f. Parts cleaning/solvent degreasing
- g. Welding, cutting, and grinding activities
- h. VOC emissions from diesel tanks and refueling operations
- i. One (1) 12,000-gallon diesel fuel tank
- j. Three (3) 500-gallon new engine lube oil and one (1) 500 -gallon used/waste engine lube oil above ground storage tanks

**Owner:** Trail Ridge Energy, LLC

**Site Name:** Trail Ridge RNG Project (Air Facility ID No. to be Assigned by FDEP):

1. Regulated Emission Units

- a. EU 004 – Internal Combustion Engine #1
- b. EU 005 – Internal Combustion Engine #2
- c. EU 006 – Internal Combustion Engine #3
- d. EU 007 – Internal Combustion Engine #4
- e. EU 008 – Internal Combustion Engine #5
- f. EU 009 – Internal Combustion Engine #6

2. Insignificant Activities

- a. Engine coolant for the six (6) stand-alone fan-cooled radiators (drum quantities) at the Trail Ridge Energy Plant.

Representatives for both owners held a discussion with the Department concerning this request on June 20, 2024. Based on this request, the engine coolant for the 6 stand-alone fan-cooled radiators (drum quantities) at the Trail Ridge Energy Plant will be removed from Appendix I in the renewed draft permit, Appendix 40 CFR 60, NSPS, Subpart JJJJ is removed from the renewed draft permit, a Title V permit under AIRS ID 0310358 will be issued to the City of Jacksonville for the stated regulated emission units and insignificant activities. A separate Title V permit under AIRS ID 0310654 will be issued to the Trail Ridge Energy, LLC for the stated regulated emissions units and insignificant activities. Application No. 0310358-021-AC received on October 4, 2024 from the City of Jacksonville to revise the underlying permit condition 10 in previously issued Permit No. 0310358-012-AC/PSD-FL-374C to state that the emission rate of total VOC does not include formaldehyde will be processed with the draft Title V permit issued to the City of Jacksonville. The terms and conditions of this construction permit revision will be incorporated into the draft Title V permit issued to Trail Ridge Energy, LLC.

## CONCLUSION

This project renews Title V air operation Permit No. 0310358-016-AV, which was effective on November 26, 2019 for the emission sources owned by the City of Jacksonville. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.