TECHNICAL EVALUATION

APPLICANT

Pinellas County Utilities Administration
3095 114th Avenue North
St. Petersburg, Florida 33716

Pinellas County Resource Recovery Facility
Facility ID No. 1030117

PROJECT

Project No. 1030117-011-AC
Exemption from Requirement to Obtain an Air Construction Permit and Trial Burn Authorization

Biosolids Pellets Project
(Project)

COUNTY

Pinellas County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

March 2014

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

This facility is an existing municipal waste combustor facility categorized under Standard Industrial Classification No. 4953.

The existing Pinellas County Resource Recovery Facility is located in Pinellas County at 3001 110th Avenue North, St. Petersburg, Florida. The UTM coordinates are Zone 17, 335.20 km East and 3084.10 km North; Latitude: 27° 52' 23" North and Longitude: 82° 40' 25" West.

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- This facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The applicant requested a permit determination and a one-time trial burn authorization for the biosolids pellets (project). The Department can either make a determination that a case-by-case permitting exemption from an air construction (AC) permit is appropriate based on the circumstances (also referred to as a "Rule 62-4.040(1)(b), F.A.C. exemption") or require a minor source AC permit for the proposed project.

This proposed project is scheduled to occur in March 2014.

The Pinellas County Resource Recovery Facility operates under the current valid Title V air operation permit, Permit No. 1030117-008-AV, which was effective July 15, 2011.

Application (Request) Processing Schedule

Request received via email on March 5, 2014 (complete "application").

Complete details of the proposed project are accessible via the Department's world wide web site at http://appprod.dep.state.fl.us/air/emission/apds/default.asp by entering the project number shown above.

Relevant Documents

- Permit No. 1030117-011-AV, Most Recent Title V Air Operation Permit Renewal.
- Permit No. 1030117-009-AC, Removed Sewage Sludge Prohibition and Requires Written Approval for non-listed or non-defined MSW/fuels.

2. DEPARTMENT REVIEW

The applicant's March 5, 2014 submission describes the details of the proposed project. The proposed project is to take place at the Pinellas County Resource Recovery Facility.

The Pinellas County Resource Recovery Facility has three municipal waste combustors - Unit Nos. 1, 2 & 3 (Emissions Unit Identification Numbers (E.U. ID Nos.) 001, 002 & 003) with auxiliary burners.

Each of the three municipal waste combustors (MWC) has a nominal design rated capacity of 1,000 tons municipal solid waste (MSW) per day, for a total of 3,000 TPD from all three units. The applicant anticipates combusting the biosolids over the course of a week. Over a 7 day period, a daily biosolids rate can be 1.4 TPD. Combustion of 10 tons of biosolids in a week represents less than 0.05% of the total MSW capacity.

Air pollutants which could result from the combustion of Class A biosolids in a mass burn MWC unit are particulate matter (PM), sulfur dioxide (SO_2), nitrogen oxide (NOx), carbon monoxide (CO) and mercury (Hg).

Odor is controlled by drawing combustion air from the refuse tipping floor area. Each MWC unit is equipped with the following air pollution controls for the air pollutants described: spray dry absorbers (SDAs) and baghouses are used for the control of acid gases [SO_2 + HCl] and PM emissions, selective non-catalytic reduction (SNCR) and burner design for the control of NOx emissions, and activated carbon injection (ACI) systems for the control of Hg and certain organic emissions. Burner design and good combustion practices also control CO emissions.

Because the MWC units are well equipped with air pollution controls and employ other measures such as good combustion the impact on air pollutants when combusting such a small quantity of biosolids may be negligible if any. The facility has state of the art continuous emission monitoring systems (CEMS) in place for the monitoring of opacity, SO_2, NOx, and CO emissions. Data from these monitors can be obtained while combusting the Class A biosolids and the data can be evaluated for any effects on air pollutants when combusting the Class A biosolids.

Based on the information provided in the applicant's submission and the Department's review, the proposed work (project) is deemed to be exempt from an AC permit as conditioned.

3. DETERMINATION

Pursuant to Rule 62-4.040(1)(b), F.A.C. and for the reasons stated in this Technical Evaluation, the Office of Permitting and Compliance hereby determines that the proposed activity (project) will not emit air pollutants "*... in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified.*" Therefore, the project is exempt from the requirement to obtain an AC permit. The permittee is authorized to conduct this one-time activity.

This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. A copy of this letter shall be maintained at the site of the proposed activity.

This permitting decision is made pursuant to Chapter 403, Florida Statutes.

Mr. Scott M. Sheplak, P.E. is the permit processor responsible for reviewing the request and drafting the exemption. Additional details of this analysis may be obtained by contacting him by telephone at 850/717-9074 or by e-mail at scott.sheplak@dep.state.fl.us in the Department's Office of Permitting and Compliance at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.