FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

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

PROJECT

Final Permit No. 1030117-008-AV
Pinellas County Resource Recovery Facility

The purpose of this project is to renew the Title V air operation permit for the Pinellas County Resource Recovery Facility.

The Title V air operation permit was processed using a parallel review.

PUBLIC NOTICE

A Written Notice of Intent to Issue Air Permit to Pinellas County Utilities Administration for the Pinellas County Resource Recovery Facility located in Pinellas County at 3001 110th Avenue North, Florida, was clerked on April 28, 2011. The Public Notice of Intent to Issue Air Permit was published in the St. Petersburg Times on May 21, 2011. The draft/proposed Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice of Intent to Issue Air Permit was received on May 27, 2011.

COMMENTS

On April 28, 2011, the Department informed US EPA Region 4 that the Title V air operation permit was being processed using a parallel review. US EPA Region 4 was notified of the publication date of the Public Notice on May 27, 2011.

No comments on the permits were received from the public during the 30-day public comment period. Comments on the permits were received from the Applicant and the Operator during the 30-day public comment period. The comments are addressed below. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strike through~~. All changes are emphasized with yellow highlight in the electronic document.

Letter from the Applicant, Pinellas County Utilities Administration (Owner of the Pinellas County Resource Recovery Facility (PCRRF)) dated June 17, 2011, received on June 20, 2011

Comments

1. Statement of Basis and Title V Air Operation Permit - Subsection I.A. Facility Description. The applicant requested the replacement of the word "total" with "nominal" before capacity and the insertion of the word "approximately" before 3,000 tons/day.

***Response*:** Consistent with the capacity Specific Condition **III.A.4.** for the municipal waste combustor (MWC) units, the facility description is clarified and corrected to read as follows:

"**Subsection A. Facility Description.**

The Pinellas County Resource Recovery Facility consists of three municipal solid waste combustors (Unit Nos. 1, 2 and 3) with auxiliary burners, lime storage and processing facilities, an activated carbon storage facility, ash storage and processing facilities, a metals recovery system, a cooling tower, ancillary support equipment, and a contiguous municipal solid waste landfill. The gross nominal electric generating capacity of the facility is 75 megawatts (MW). The ~~total~~ capacity of the Pinellas County Resource Recovery Facility is 3,000 tons/day (TPD) on a rolling 12-month average of solid waste fuel with a nominal higher heating value (HHV) of 5,000 British thermal units (Btu)/lb."

2. Title V Air Operation Permit - Subsection I.B. Summary of Emissions Units. The applicant requested the emissions units to be listed in numerical order, understanding that Emissions Unit (E.U.) ID No. 13 would be out of order as it is in a separate category.

***Response*:** The Department finds this request acceptable. The emissions units are listed in numerical order as requested. The "Subsection I.B. Summary of Emissions Units" is corrected to read as follows:

Subsection B. Summary of Emissions Units.

E.U. ID No.	Brief Description
Regulated Emissions Units	
…	…
011	Emergency Generator - Main Lift Station
012	Emergency Fire Pump Engine (EPA Tier 3 Certified)
014	Diesel Tub Grinder (primary engine and secondary engine)
015	Portable Emergency Generator - Pond A
016	Emergency Generator - Maintenance Building
~~014~~	~~Diesel Tub Grinder (primary engine and secondary engine)~~
~~012~~	~~Emergency Fire Pump Engine (EPA Tier 3 Certified)~~
017	Emergency Generator - Scale House (EPA Tier 3 Certified)
018	Emergency Generator - Administrative Building (EPA Tier 3 Certified)
…	…

3. Title V Air Operation Permit - Subsection I.C. Applicable Requirements. The applicant requested a review of the E.U. ID No(s). associated with Rule 62-210.300, F.A.C., Permit Required.

***Respons*e**: E.U. ID Nos. 015 - 018 are regulated engines, therefore, should be associated with Rule 62-210.300, F.A.C., Permits Required. E.U. ID Nos. 015 - 018 are added to the Rule 62-210.300, F.A.C. applicable requirement listed as follows:

Applicable Requirement	E.U. ID No(s).
…	…
Rule 62-210.300, F.A.C., Permits Required	001 - 009 & 011 - 01~~4~~8

4. Title V Air Operation Permit - Facility-wide Specific Condition II.FW5. The applicant asked if there was a regulatory basis for the requirement for the "paving of roads and parking areas" stated in Specific Condition II.FW5.a. The applicant indicated that the facility may utilize alternative parking areas that are landscaped with rocks or are sodded, which also acts as a reasonable precaution to prevent unconfined particulate matter (PM).

The applicant requested that the phrase "Periodic sweeping of roads." in Specific Condition II.FW5.j. to be changed to "Periodic sweeping of paved roads and wetting of unpaved roadways."

***Response*:** The "paving of roads and parking areas" was proposed as a technique to minimize unconfined emissions of PM in the permit renewal application. The regulatory basis for this requirement is stated in the brackets, e.g. "[…]," at the end of the specific condition. The regulatory basis cited is Rule 62-296.320(4)(c), F.A.C. The Department understands that the facility may utilize alternative parking areas that are landscaped with rocks or are sodded. This clarification is also added to Specific Condition **II.FW5.a.**

As to the second requested change to Specific Condition **II.FW5.j.**, the Department understands that many of the internal site roadways within the landfill working area and mulch area are not paved and dust control is accomplished by wetting these roads using a water truck. The requested clarification is acceptable.

Specific Condition **II.FW5.** is clarified to read as follows:

> "**FW5.** Unconfined Particulate Matter. 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
>
> Resource Recovery Facility Area
>
> a. Paving and maintenance of roads and parking area. The facility may utilize alternative parking areas that are landscaped with rocks or are sodded.
>
> …
>
> Landfill, Mulching, and other Areas at the Pinellas County Complex
>
> …
>
> j. ~~Periodic sweeping of roads~~Periodic sweeping of paved roads and wetting of unpaved roadways."

5. Title V Air Operation Permit - Subsection III.A. Emissions Unit Descriptions. The applicant requested clarifying changes to the second and fifth paragraphs in the emissions unit descriptions for the three municipal solid waste (MSW) combustors. The requested clarifications are as follows:

> "Each of the three municipal waste combustors (MWC) has a nominal design rated capacity of 1,000 tons MSW per day, 417 MMBtu/hour heat input, and 250,000 lbs/hour steam production based on MSW having a heating value of 5,000 Btu/lb. Design combustor rated capacity of MSW in tons per day is considered nominal due to variability associated with the higher heating value of the processed waste. The capacities (maximums) are 458 MMBtu/hour heat input and 275,000 lbs/hour of steam per each boiler. ~~Short term c~~Capacity is restricted by steam production based upon a 4-hour block average ~~to 275,000 lbs/hr~~, which effectively limits heat input in MMBtu/hour. Maximum steam production is limited to 275,000 lbs/hour on a 4-hour block average. The net design steam enthalpy for useful work is 1,158 Btu/lb.
>
> …
>
> All three units exhaust to a common stack consisting of three separate flues. The ~~stack~~design parameters for each flue are: height, 165 feet; diameter, 8.5 feet; exit temperature, 270 degrees F; and, actual stack gas flow rate, 243,117 acfm."

***Response*:** The change to the fifth paragraph is not deemed to be necessary. The second paragraph in the emissions unit description is clarified and corrected to read as follows:

> "Each of the three municipal waste combustors (MWC) has a nominal design rated capacity of 1,000 tons MSW per day, 417 MMBtu/hour heat input, and 250,000 lbs/hour steam production based on MSW having a heating value of 5,000 Btu/lb. The capacities (maximums) are 458 MMBtu/hour heat input and 275,000 lbs/hour of steam per each boiler. ~~Short term c~~Capacity is restricted by steam production based upon a 4-hour block average ~~to 275,000 lbs/hr~~, which effectively limits heat input in MMBtu/hour. Maximum steam production is limited to 275,000 lbs/hour on a 4-hour block average. The net design steam enthalpy for useful work is 1,158 Btu/lb.
>
> …

All three units exhaust to a common stack consisting of three separate flues. The ~~stack~~design parameters for each flue are: height, 165 feet; diameter, 8.5 feet; exit temperature, 270 degrees F; and, actual stack gas flow rate, 243,117 acfm."

6. Title V Air Operation Permit - Specific Condition III.A.4. The applicant requested the specific condition language to be clarified as follows:

"**A.4.** Capacity. The following maximum values (capacities) shall not be exceeded:
a. 1,100 tons/day (TPD) individual MWC unit throughput of MSW;
b. 458 MMBtu/hr individual MWC unit heat input; and,
c. 275,000 lbs/hr individual MWC unit steam production on a 4-hour block arithmetic average.
The method for determining compliance with a., b., and c. is utilizing steam production on a 4-hour block average. The MWCs shall not be loaded in excess of their maximum operating capacity, equivalent to 3,300 TPD total, but no more than 3,000 TPD on a rolling 12-month average where compliance is demonstrated based upon steam production with MSW having a heating value of 5,000 Btu/lb. See 40 CFR 60.31b of Appendix 40 CFR 60, Subpart Cb and 40 CFR 60.58b(j) of Appendix 40 CFR 60, Subpart Eb for additional restrictions on capacity. [Rules 62-4.160(2) & 62-210.200 (PTE), F.A.C.; 40 CFR 60.31b & 40 CFR 60.58b(j); and, Permit Nos. 1030117-007-AC, PSD-FL-011 & PSD-FL-098, as amended.]

***Response*:** A detailed review of the underlying PSD permits indicates that heat input is not limited by specific condition; however, waste tonnage (in pounds per hour MSW) and steam production is limited by specific condition (see specific condition 1.b. in PSD-FL-098).

The applicant requested changing the MWC waste tonnage (TPD) demonstration to be based on steam production. The Department considers changing the MWC waste tonnage (TPD) demonstration to be a change to an underlying PSD applicable requirement. Changes to an underlying applicable requirement can not be made in a Title V air operation permit. Also, the draft/proposed permit has already been public noticed and the draft/proposed permit went final by operation of law. To make this requested change you need to submit a request to revise the underlying PSD applicable requirement along with detailed justification.

Specific Condition **III.A.4.** is corrected to read as follows:

"**A.4.** Capacity. The following maximum values (capacities) shall not be exceeded:
a. 1,100 tons/day (TPD) individual MWC unit throughput of MSW; and,
b. ~~458 MMBtu/hr individual MWC unit heat input; and,~~
~~c~~. 275,000 lbs/hr individual MWC unit steam production on a 4-hour block arithmetic average.
The MWCs shall not be loaded in excess of their maximum operating capacity, equivalent to 3,300 TPD total, but no more than 3,000 TPD on a rolling 12-month average. See 40 CFR 60.31b of Appendix 40 CFR 60, Subpart Cb and 40 CFR 60.58b(j) of Appendix 40 CFR 60, Subpart Eb for additional restrictions on capacity. [Rules 62-4.160(2) & 62-210.200 (PTE), F.A.C.; 40 CFR 60.31b & 40 CFR 60.58b(j); and, Permit Nos. 1030117-007-AC, PSD-FL-011 & PSD-FL-098, as amended.]

7. Title V Air Operation Permit - Specific Condition III.A.6.b.(1)(h). The applicant stated that this condition was carried over from the facility's PSD permit, PSD-FL-098. They understood this condition applied to grease, scum and grit screenings from wastewater treatment plants. The applicant requested the condition to be clarified.

The applicant also asked if restaurant grease trap waste would be prohibited by this condition.

***Response*:** The Department agrees with the comment regarding the original meaning of Specific Condition **III.A.6.b.(1)(h)**. The Department's guidance memorandum, DARM-PER-10 dated July 28, 2009, allows the incorporation of clarifying permit language changes to an AC/PSD permit, preserving the original meaning of the specific condition. Specific Condition **III.A.6.b.(1)(h)** is clarified to read as follows:

"…

(h) grease, scum and grit screenings from wastewater treatment plants [1];

…"

Also, restaurant grease trap waste would not be prohibited by Specific Condition **III.A.6.b.(1)(h)**. Restaurant grease trap waste may be specifically authorized elsewhere in Specific Condition **III.A.6.**

8. Title V Air Operation Permit - Specific Condition III.A.11. The applicant claims this is a historical condition, as the O&M plans were already submitted. Also, the condition states that a separate O&M plan must be submitted for each MWC Unit and shall be on file with the Compliance Authority. The applicant stated that the MWC Units are substantially similar, other than some internal aspects of the boiler on MWC Unit #3. The PCRRF indicated that they can not attest that the Compliance Authority is keeping the O&M plans on file.

***Response*:** The MWC units and associated air pollution control devices are required to be operated and maintained in accordance with the submitted O&M plans under this condition, so the condition still applies. The Department acknowledges the remainder of the comment. No changes to the permit are made.

9. Title V Air Operation Permit - Specific Condition III.A.24. The applicant claimed there is not a separate refuse bunker and ash handling load out station for MWC Unit #3. This was a condition from an underlying PSD permit, prior to the construction of the first ash processing building. This condition would more appropriately be applied to E.U. ID No. 005, Residue Storage and Processing Building. The applicant suggested moving this condition to Subsection B. and referring to compliance with Specific Condition B.6.

***Response*:** The Department agrees with the comment however, moving this condition to Subsection III.B. is not necessary because specific conditions regulating fugitive ash emissions are already in the Subsections III.A. and III.B. (see Specific Conditions **III.A.23.** and **III.B.6.**). Specific Condition **III.A.24.**'s header is corrected to read as follows:

> "**A.24.** ~~Refuse Bunker and Ash Handling and Load Out Stations for~~ MWC Unit 3. The potential for dust generation by ash handling activities shall be mitigated by quenching the ash prior to loading in ash transport trucks and/or scrap piles. [PSD-FL-098.]"

10. Title V Air Operation Permit - Specific Condition III.A.25. The applicant indicated that the May 10, 2000 amendments to 40 CFR 60, Subpart Cb changed the allowable excess emissions. There is no mention of this change in this section, and the applicant requested that this rule language be added as specifically allows for excess emissions greater than the specified 3 hours during specific malfunction events specifically up to 15 hours. Also, the oxygen correction was capped at 14% oxygen for these same specific malfunction events, and the applicant requested that this rule language be added to this condition as well.

***Response*:** The 40 CFR 60, Subpart Cb was amended, changing the allowable excess emissions. Note, Specific Condition **III.A.25.** originates from PSD permits and the State of Florida's approved state implementation plan (SIP) Rules 62-210.700(1) & (5), F.A.C. (see the regulatory citations). The federal allowable excess emissions provisions partially referenced in the comment are contained in their entirety within the Appendices 40 CFR 60 Subpart Cb and Eb which are attached as part of the permit in Specific Conditions **A.45.** and **A.46.** The requirements from the 40 CFR 60, Subpart Cb, Emissions Guidelines (EG) are separate and distinct applicable requirements. For permit simplification, the federal excess emission provisions from the 40 CFR 60, Subpart Cb are kept within their entirety in the appendices. No changes are made.

11. Title V Air Operation Permit - Specific Condition III.A.31. The applicant requested that the reference to EPA Method 202 in determining PM/PM_{10} emissions to be deleted from the permit.

***Response*:** 40 CFR 60.38b (Subpart Cb) which refers to 40 CFR 60.58b (Subpart Eb) does not list EPA Method 202. The Department agrees with the comment. Specific Condition **III.A.31.** is corrected to read as follows:

A.31. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method(s)	Description of Method(s) and Comment(s)
EPA Methods 1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
EPA Methods 5, 17~~,~~ or 201A ~~or 202~~	Methods for Determining PM/PM_{10} Emissions. The minimum sample volume shall be 30 dry standard cubic feet.
…	…

12. Title V Air Operation Permit - Specific Condition III.A.34. The applicant stated that the F limit only applies to MWC Unit #3. Please refer to Specific Condition A.22. This condition should be revised to remove the reference to testing for F prior to Title V renewal for the other two MWC Units.

***Response*:** The Department agrees with the comment; this was an error. Specific Condition **III.A.34.** is corrected to read as follows:

> "**A.34.** Compliance Test Prior To Renewal. Prior to permit renewal, Emissions Unit ID No~~s~~. ~~001, 002 and~~ 003 shall be tested to demonstrate compliance with the emission limitations and standards for F. [Rule 62-297.310(7)(a)3., F.A.C.]"

13. Title V Air Operation Permit - Specific Condition III.A.36. Please see the previous comment on Specific Condition A.24. (see comment number 9.).

***Response*:** The Department's response to comment number 9. applies here as well. Specific Condition **III.A.36.** is corrected to read as follows:

> "**A.36.** ~~Refuse Bunker and Ash Handling and Load out Stations for~~ MWC Unit 3. Compliance with the opacity standard for the ash handling ~~and load out stations~~ for MWC Unit 3 shall be determined by evaluating the emissions in accordance with EPA Reference Method 22. [PSD-FL-098.]"

14. Title V Air Operation Permit - Specific Condition III.A.37. The applicant requested that the "Reporting Deadline(s)" language be revised to state the following: "Every 6 months (quarter), if requested in writing by the Compliance Authority every 3 months."

***Response*:** The Department does not find it necessary to add the suggested language. As stated in the first column of this new table in the permit, if the report is requested for a quarter then it is required to be submitted. Also, the rule does not specify that the request has to be made in writing. No changes to the permit are made.

15. Title V Air Operation Permit - Specific Condition III.A.41. The applicant claimed that this permit term was new and serves no environmental protection purposes. Keeping monthly auxiliary burner fuel usage records, and calculating an equivalent heat input, does not help to ensure compliance with any condition listed in the permit. The applicant requested that this permit term be deleted.

***Response*:** This specific condition was previously in Specific Condition **B.94.** of Permit No. 1030117-006-AV. This requirement had been in all MWC permits prior to the 40 CFR 60 Subparts Cb and Eb being amended removing the applicability of the NSPS 40 CFR 60, Subpart Db to auxiliary burners at MWC facilities. This requirement no longer applies because of the amendment to 40 CFR 60 Subparts Cb and Eb, therefore it is considered to be obsolete. The Department agrees with its removal. Specific Condition **III.A.41.** is removed from the permit and the remainder of the specific conditions are renumbered accordingly.

16. Title V Air Operation Permit - Subsection III.B. Emissions Unit Description. The applicant stated that the previous Title V operating permit had the following language - "The scrubber is operated when deemed necessary by the operator." This language does not appear in the proposed draft permit. The applicant requested that this language to be re-inserted.

***Response*:** The Department agrees with the comment. The language in Subsection III.B. Emissions Unit Description is corrected to read as follows:

> "Emissions Unit ID No. 008 is the Ash Conditioning Building (ACB). The ACB contains two 20 ton capacity fly ash surge bins. The fly ash is wetted to control the dust and minimize fugitive emissions. A high efficiency wet venturi scrubber (Tri-Mer Corporation Model No. 50-H) is utilized to remove fugitive particulate matter emissions in the ACB. The scrubber is operated when deemed necessary by the operator. The wet scrubber vents the treated air at 1,200 acfm through a 1.3 foot diameter stack that is approximately 65 feet in height. The initial startup date of the scrubber was September 24, 1998."

17. Title V Air Operation Permit - Specific Condition III.B.2.

The facility indicated that they do not have a direct means to demonstrate compliance with the permitted capacity conditions specified in items listed in a. through d.

The filling rate of the silos is not known until completion of the delivery. Also, this condition erroneously implies that if a hydrated lime delivery takes longer than one hour to unload that it may be a compliance issue even if the visible emissions are below 5%.

There is no direct means of weighing the ash loading weight of the RSPB and ACB.

These conditions need clarification as to the method of compliance demonstration. In the previous Title V permit there was a permitting note associated with the above condition, however, this permitting note was still unclear to the method of demonstration of compliance.

The underlying basis for these permitted capacities appears to be the initial Title V permit application itself, and this information was supplied as part of the application but was not necessarily intended to be a "permitted capacity" or a limitation. The rules listed in the regulatory citations contain no basis on which to impose these permit limits.

The applicant requested that Specific Condition B.2. be deleted in its entirety or clarified to the method of demonstrating compliance with the specified permitted capacities.

***Response*:** The "permitted capacities" for these miscellaneous regulated emissions units were carried forward from the previous Title V air operation permit, Permit No. 1030117-006-AV, Specific Condition **C.1.** As the permitting note in Permit No. 1030117-006-AV had previously pointed out, these values (permitted capacities) were placed in the permit to identify the capacity of the unit for purposes of emissions testing, to establish appropriate emission limits and to aid in determining future rule applicability. The rules and permits cited in the brackets at the end of the specific condition provide the regulatory basis to support the permitted capacities stated in the permit. For example, Rule 62-210.200 (PTE), F.A.C. represents the definition of PTE (potential to emit) which depends on a unit's physical or operational design, i.e., its maximum capacity. Rule 62-4.160(2), F.A.C. refers to the specific processes and operations (capacity) for which the permit is valid. The air construction permits cited also specify one or more of the listed permitted capacities.

A direct means of determining compliance with capacities has <u>not</u> been and is <u>not</u> required by this Office. Instead, a reasonable way of showing compliance with these values is acceptable, like back calculating a short-term value (tons or pounds per hour) from a long-term value (tons per year) and/or based on an industry estimated standard. These values (rates) are typically submitted with test results.

The Department understands that the filling of the lime silo could occur in more than one hour and there could be confusion regarding whether or not there would be a compliance issue even when visible emissions (VE) are less than 5% opacity. To avoid confusion, the one hour period is deleted. Specific Condition **B.2.a.** is corrected to read as follows:

> "**B.2.a.** <u>Permitted Capacity</u>.
> a. *Hydrated Lime Storage Silo for Water Softening*. The filling rate for the hydrated lime storage silo shall not exceed 25 tons/hour ~~(occurs in less than one hour)~~.
> b. *RSPB*. The charging rate for the RSPB shall not exceed 112 tons/hr ash.
> c. *Activated Carbon Silo and Lime Storage Silo for SDA*. The filling rate for the activated carbon and lime storage silos shall not exceed 20,000 and 30,000 lbs/hr, respectively.
> d. *ACB*. The charging rate for the ACB shall not exceed 41.7 tons/hr fly ash.
> [Rules 62-4.160(2) & 62-210.200 (PTE), F.A.C.; Permit Nos. AC52-259351 & 1030117-007-AC; and, Applicant Request.]"

No other changes are made to Specific Condition **B.2.**

18. Title V Air Operation Permit - Specific Condition III.B.9. The comment is the same as the previous one made on Specific Condition III.A.11. (see comment number 8.).

***Response*:** The Department's response to this comment is the same as it was for comment number 8.; no changes to the permit are made.

19. Title V Air Operation Permit - Specific Condition III.B.16. The comment is the same as the previous one made on Specific Condition III.A.37. (see comment number 14.).

***Response*:** The Department's response to this comment is the same as it was for comment number 14.; no changes to the permit are made.

20. Title V Air Operation Permit - Subsection III.D. Emission Unit Brief Descriptions. The applicant requested the emissions units listed to be arranged in numerical order.

***Response*:** The Department finds this request acceptable. The emissions units are listed in numerical order as requested. The "Subsection III.D. Summary of Emissions Units" is corrected to read as follows:

E.U. ID No.	Brief Description
	Engines
011	Emergency Generator - Main Lift Station
012	Emergency Fire Pump Engine (EPA Tier 3 Certified)
014	Diesel Tub Grinder (primary engine and secondary engine)
015	Portable Emergency Generator - Pond A
016	Emergency Generator - Maintenance Building
~~014~~	~~Diesel Tub Grinder (primary engine and secondary engine)~~
~~012~~	~~Emergency Fire Pump Engine (EPA Tier 3 Certified)~~
017	Emergency Generator - Scale House (EPA Tier 3 Certified)
018	Emergency Generator - Administrative Building (EPA Tier 3 Certified)

21. Title V Air Operation Permit - Appendix I. Regarding item number 33., the applicant indicated that the site does not track the quantity of paint utilized on a daily basis.

***Response*:** Approximating paint usage based upon an annual daily average is adequate. No change is necessary to Appendix I.

22. Title V Air Operation Permit - Appendix U. The applicant identified a typographical error in the emissions unit Description column, delete the word "no."

***Response*:** The Department agrees with the comment; the word "no" is deleted. This line is corrected to read as follows:

E.U. ID No.	Brief Description of Emissions Units and/or Activity
013	Cooling Tower {The cooling tower does ~~no~~ not use chromium-based water treatment chemicals.}

23. Title V Air Operation Permit - Table 2. The applicant stated that CO should indicate a 4-hr average. NOx and SO_2 currently indicate 1-hour, but should indicate a 24-hour average.

***Response*:** Table 2 was intended to simply be a summary. As stated on the table, it "*... summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.*" The column labeled "Min. Compliance Test Duration" originally had coincided with test methods listed in the column labeled "Compliance Method." The Department understands the confusion with respect to the timeframes, as compliance with the specific emission standards/limits for CO, NOx and SO_2 emissions are demonstrated by CEMS. Therefore, it is more appropriate to list the averaging period for the CEMS data for which compliance is demonstrated.

CO

The CO averaging period is a 4-hour block average (see Specific Condition **A.21.** in the permit). In Table 2, the compliance method listed for CO is changed from "EPA Method 10, 10A, 10B" to "CEMS." The timeframe listed for CO in Table 2 is corrected, changing it from "4-hours" to "4-hour block average."

NOx

The NOx averaging period is a 24-hour daily arithmetic average. Specific Condition **A.20.** in the draft/proposed permit did not contain an averaging time. 40 CFR 60.38b(a) from 40 CFR 60, Subpart Cb refers to 40 CFR 60,

Subpart Eb, specifically, to 40 CFR 60.58b(h) where compliance with the NOx emission limit is based on the 24-hour daily arithmetic average of the hourly emission concentrations using continuous emission monitoring system outlet data.

The NOx averaging period in Specific Condition **A.20.** is corrected to read as follows:

> "**A.20.** Nitrogen Oxides. The emission limit for nitrogen oxides (NOx) contained in the gases discharged to the atmosphere from a mass burn waterwall type municipal waste combustor technology is 205 parts per million by volume, corrected to 7 percent oxygen, dry basis. Compliance with this emission limit is based on the 24-hour daily arithmetic average of the hourly emission concentrations using continuous emission monitoring system outlet data. Emissions averaging pursuant to 40 CFR 60.33b(d)(1) shall be allowed. 40 CFR 60.33b(d)(2) shall not apply. [Rule 62-204.800(9)(b)3.h., F.A.C.; 40 CFR 60.33b(d); and, PSD-FL-011 & PSD-FL-098, as amended.]"

In Table 2, the compliance method listed for NOx is changed from "EPA Method 7, 7A, 7C, 7D or 7E" to "CEMS." The timeframe listed for NOx in Table 2 is corrected, changing it from "1-hour" to "24-hour daily arithmetic average."

SO_2

The SO_2 averaging period is a 24-hour daily geometric mean (see Specific Condition **A.17.** in the permit). In Table 2, the compliance method listed for SO_2 is corrected, changing it from "EPA Methods 6, 6A or 6C" to "CEMS." The timeframe listed for SO_2 in Table 2 is corrected, changing it from "1-hour" to "24-hour daily geometric mean."

24. Title V Air Operation Permit - Subsection III.A. The applicant requested that boiler on-line criteria be specified in the permit. The applicant suggested specific language to be added, defining when the boilers are "off-line."

***Response*:** The Department understands that the comment is related to defining startup and shutdown periods for continuous emissions monitoring systems (CEMS) data purposes. The federal regulations, 40 CFR 60, Subpart Cb and Eb, do not define at what level boilers are considered to be "off-line" or "on-line." The federal regulations do mention "off-line" and "on-line" periods under NOx emissions averaging plans. Boiler manufacturer information and/or operations manuals typically define "off-line" and "on-line" periods on a case-by-case basis for each individual boiler. The Department acknowledges the comment. However, no changes to the permit are made.

Letter from Operator, Veolia ES Pinellas, Inc. (Operator of the Pinellas County Resource Recovery Facility (PCRRF)) dated June 20, 2011, received on June 20, 2011

Comments

1. Title V Air Operation Permit - Specific Condition III.A.50. The current operator of the PCRRF, Veolia ES Pinellas, Inc., commented on "Table 3, Revised Facility Baseline and Projected Actual Emissions Estimates." The operator requested that the DEP not incorporate "erroneous" baseline emissions into the final permit until the results of either the Department's assessment or Pinellas County's assessment of this matter has been resolved.

***Response*:** The "Table 3, Revised Facility Baseline and Projected Actual Emissions Estimates" is referenced in the permitting note in Specific Condition **III.A.50.** This table is a referenced attachment to the permit and is provided for informational purposes. The Department acknowledges that Pinellas County forwarded a copy of the report referenced in the comment letter to the Department, and that Pinellas County has indicated it is conducting an independent assessment of the report and will provide the results of its assessment to the Department. This issue is still under consideration. No changes to the permit are made at this time.

CONCLUSION

The comments were not considered significant enough to reissue the draft/proposed Title V air operation permit, and to require another Public Notice. The final action of the Department is to issue the final Title V air operation permit with the administrative corrections and/or clarifications as noted above.

This draft/proposed Title V air operation permit became a final Title V air operation permit on July 15, 2011 (Day 55) by operation of law pursuant to Section 403.0872, F.S.