PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Office of Permitting and Compliance

Draft Air Permit No. 1030117-009-AC / PSD-FL-420
Pinellas County Resource Recovery Facility
Pinellas County, Florida

Applicant: The applicant for this project is the Pinellas County Environment and Infrastructure Department. The applicant's authorized representative and mailing address are: Mr. Robert J. Hauser, Director, Solid Waste Division, 3095 114th Avenue North, St. Petersburg, Florida 33716.

Facility Location: The existing Pinellas County Resource Recovery Facility is owned by Pinellas County and is operated by Veolia ES Pinellas, Inc. This existing facility is located in Pinellas County at 3001 110th Avenue North in St. Petersburg, Florida.

Project: The facility consists of a municipal solid waste (MSW) landfill, three nominal 1,050 tons per day (tons/day) municipal waste combustors (MWC) and ancillary equipment. The Department will re-permit the portion of the Facility Improvement Project (previously permitted in December 2006) consisting of: MWC furnace tube, stoker grate and air preheater replacements and improvements to the MWC air pollution control and monitoring systems. Further work is authorized on the furnaces, auxiliary burners and MWC air pollution control equipment by this permit.

The project is subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality and determinations of Best Available Control Technology (BACT) in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.).

Based on the air permit application, the project will result in net emissions increases of: 501 tons per year (tons/year) of carbon monoxide (CO); 297 tons/year of sulfur dioxide (SO_2); 297 tons/year of MWC acid gases as hydrogen chloride (HCl) and SO_2; and 297 tons/year of precursors (SO_2) to particulate matter with an aerodynamic diameter less than 2.5 micrometers ($PM_{2.5}$).

The control equipment for multi-pollutant control already installed on the three MWCs consists of: good combustion practices in the furnaces that minimizes formation of CO, $PM_{2.5}$ and nitrogen oxide (NO_X - a $PM_{2.5}$ and ozone precursor); urea-based selective non-catalytic reduction systems in each furnace to further control NO_X emissions; spray dryer absorbers, based on lime slurry injection, which absorbs and neutralizes SO_2 (an MWC acid gas and $PM_{2.5}$ precursor) for subsequent capture as particulate matter (PM); activated carbon injection systems to capture (adsorb) certain metals and organic hazardous air pollutants (HAP) for subsequent capture as PM; and fabric filters (baghouses) to capture PM originating from the combustion, the acid gas reactions and the spent activated carbon.

The Department has determined the following BACT emission standards for the pollutants triggering PSD: for CO – 100 parts per million CO by volume dry, at 7 percent oxygen (ppmvd @7% O_2) on a 4-hour block average as measured by continuous emission monitoring systems (CEMS); for SO_2 – 24 ppmvd @7% O_2, geometric mean, on a 24-hour basis as measured by CEMS; for MWC acid gases – the SO_2 limit and a hydrogen chloride (HCl) limit of 20 ppmvd @7% O_2 as measured by annual stack test requirements; for $PM_{2.5}$ – 30 milligrams per dry standard cubic meter (mg/dscm) @7% O_2, including condensable $PM_{2.5}$, measured by annual stack tests; and for visible emissions – 10% opacity.

The new BACT emission standards or certain emission standards from Department Rule 62-204.800(9)(b), F.A.C. (the Department's MWC Rule) will replace less stringent BACT

determinations performed by EPA when permitting the three MWCs in 1979 and 1987. The Department's MWC Rule applies to MWC with a capacity of 250 tons/day or greater that were constructed on or before September 20, 1994. The Department will replace several process throughput limits with a single short-term limitation of 275,000 pounds per hour of steam (lb/hour) on a 4-hour block and a single total long-term limit of 1,095,000 tons of waste throughput on a 12-calendar month rolling basis.

The Department reviewed an air quality analysis prepared by the applicant. Multisource modeling was required only for SO_2 24-hour averaging period. Following is a summary of the maximum predicted PSD increment consumed in micrograms per cubic meter ($\mu g/m^3$) by all sources in the Class II area in the vicinity of the this project and including this project:

Pollutant	Averaging Time	Allowable Increment ($\mu g/m^3$)	Increment Consumed ($\mu g/m^3$)	Percent
SO_2	24-hour	91	33	36%

Based on the analysis, emissions from the project will not cause, or contribute to, a violation of any ambient air quality standards.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Division of Air Resource Management's (DARM) Office of Permitting and Compliance is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available by entering permit number 1030117-009-AC at the following web site: http://www.dep.state.fl.us/air/emission/apds/default.asp .

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the existing facility will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit and requests for a public meeting for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of

business (5:00 p.m.) on or before the end of this 30-day period. In addition, if a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received comments result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.