



October 15, 2009

Florida Department of Environmental Protection  
Department of Air Resources Management  
2600 Blair Stone Road  
MS #5505  
Tallahassee, FL 32399-2400

RECEIVED 0938-7544

OCT 23 2009

BUREAU OF AIR REGULATION

Attention: Ms. Trina Vielhauer, Chief, Bureau of Air Regulation

**RE: BAY COUNTY UTILITIES SERVICE DEPARTMENT  
BAY RESOURCE MANAGEMENT CENTER  
FACILITY ID NO. 0050031  
BAY COUNTY RE-RATE PROJECT**

Dear Ms. Vielhauer:

Bay County Utilities Service Department (Bay County) currently operates the Bay County Waste-to-Energy Facility (BCWtE) under Title V air operating permit No. 0050031-010-AV. The facility includes two identical Municipal Waste Combustor (MWC) emission units with mass burn rotary waterwall technology.

Bay County is proposing to rerate the MWC units at the facility to their original charging capacity of 255 tons per day (TPD) of municipal solid waste (MSW @ 4500 BTU/Lb) per unit. This will correspond to a steam production limit of 68,000 pounds per hour (lb/hr) (24-hour average). The purpose of this letter is to request an applicability determination for the New Source Performance Standards (NSPS) contained in Title 40 of the Code of Federal Regulations, Part 60 (40 CFR 60), Subparts Cb and Eb, which apply to MWC combustion units greater than 250 TPD MSW charging capacity.

### History of Facility

The facility was constructed under the Florida Department of Environmental Protection (FDEP) permits AC 03-84703 and AC 03-84704, issued September 24, 1984. The emission units' initial startup date was May 1, 1987. The control equipment for the MWC units included an electrostatic precipitator (ESP) on each unit. DEP permits AC 03-145061, AC 03-152196, and PSD-FL-129 were issued October 14, 1988 to increase the MSW throughput to 255 tons per day (TPD) per unit.

Subsequently, on December 19, 1995 and amended on August 25, 1997, the U.S. Environmental Protection Agency (EPA) promulgated 40 CFR 60, Subpart Cb, "Emission Guidelines and Compliance Times for Municipal Waste Combustors That Are Constructed on or Before December 19, 1995". This final rule required MWC units with a combustion capacity greater than 250 TPD MSW to comply with new emission limits. These new emissions limits would require the facility to replace the existing ESPs with spray dryers and baghouses to control acid gases and particulate matter. The compliance date for these modifications was December 19, 2000.

At the time of the promulgation of Subpart Cb, Bay County did not desire to incur the large expense (and cost to the taxpayers) of complying with Subpart Cb. As a result, in a letter dated June 16, 1999, Bay County requested for a determination from the EPA to derate the two MWC units from 255 TPD to 245 TPD, with a corresponding steam production limit of 65,333 pounds per hour (lb/hr)(24-hour average). By derating the units, Bay County would not be subject to Subpart Cb.



Golder Associates Inc.  
6026 NW 1st Place  
Gainesville, FL 32607 USA  
Tel: (352) 336-5600 Fax: (352) 336-6603 www.golder.com



EPA approved the request to derate the facility in a letter to the DEP dated September 30, 1999 (see Attachment 1). The letter outlined a set of requirements for derating the MWC units. Bay County accomplished the requirements, which included the modification of the forced draft fan wheel from a "A" blade arrangement to a "C" blade arrangement, and a demonstration test to verify that the maximum MWC unit load would not exceed 65,333 lb/hr, 24-hr rolling average and 66,667 lb/hr, 4-hr block average. The changes were required to be implemented by December 19, 2000, which was the compliance date for Subpart Cb.

Subsequently, the facility implemented the changes and the required monitoring. Title V air operation permit No. 0050031-002-AV was issued on August 1, 2000, incorporating the new operating limitations. By derating the MWC units, the facility did not become subject to Subpart Cb, and the cost of physical and operational changes associated with the rule was avoided.

On December 6, 2000, EPA promulgated 40 CFR 60, Subpart BBBB, "Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed On or Before August 30, 1999". This rule applied to MWC units with a capacity of less than 250 TPD MSW, and required the Bay County units to meet new emission limits. The compliance date for this rule was December 6, 2005. Subsequently, on March 5, 2004, Permit No. 0050031-009-AC was issued to replace the ESP on each of the two combustors with an acid gas scrubber and a fabric filter baghouse, in addition to a lime storage and slaking equipment, a carbon storage and injection system, ID fans, new stacks and associated appurtenances. The equipment installation was completed by June, 2005.

Permit No. 0050031-011-AC, issued June 13, 2005, included the new emission limitations under Subpart BBBB, deleted the limitation and test method for beryllium, and established new operational requirements. The facility was in compliance with Subpart BBBB on November 16, 2005.

The facility is currently operating under Permit No. 0050031-010-AV issued August 1, 2005. According to facility records, the 4-hr average steam rate limit has never been exceeded since the issuance of the de-rate permit; i.e. from 1999 through the present.

#### **Request to Re-Rate Facility:**

As a result of having to comply with the Subpart BBBB requirements, Bay County has already installed the equipment necessary to meet the requirements of Subpart Cb. As a result, Bay County now desires to increase the units' capacity back to the facility's original capacity of 255 TPD MSW (@ 4500 BTU/Lb) per unit. The only physical change that may be necessary to the units to accomplish the re-rating would be the replacement of the fan blades, which were changed when the facility was de-rated in 1999. However, future operation of the unit at the higher rates may indicate new fan blades are necessary, or are desirable from an energy efficiency standpoint. The new fan blades may be required in order to provide enough combustion air to the units. Also, changing the fan blades would increase the capacity of the fans to deliver combustion air to the boilers, which could allow the fans to operate at slower speeds, and increase the energy efficiency of the fans.

Subpart Eb of 40 CFR 60 applies to large (>250 TPD MSW) MWC units that commenced construction after September 20, 1994, or for which modification or reconstruction was commenced after June 19, 1996. This definition of modification under 40 CFR 60.2 is as follows:

*Modification means any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.*

The proposed re-rate of the Bay County units would constitute a "modification" under this definition, since air emissions on a lb/hr basis will be increasing due to the additional MSW combusted. However,

according to 40 CFR 60.14(e), the following shall not, by themselves, be considered modifications under this part:

(2) "An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility".

Capital expenditure is defined in 60.2 as follows:

"Capital expenditure means an expenditure for a physical or operational change to an existing facility which exceeds the product of the applicable "annual asset guideline repair allowance percentage" specified in the latest edition of Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined by section 1012 of the Internal Revenue Code. However, the total expenditure for a physical or operational change to an existing facility must not be reduced by any "excluded additions" as defined in IRS Publication 534, as would be done for tax purposes."

The cost of replacement fan blades for both units, if required, is estimated at \$45,640.00, which is much less than the criteria which defines a capital expenditure. Therefore, the proposed re-rate project does not constitute a modification for purposes of the new source performance standards. As a result, Subpart Cb would apply to the facility after the re-rate is implemented.

We request concurrence from FEP/EPA that the facility re-rate project will trigger the requirements of 40 CFR 60 Subpart Cb, and will not trigger 40 CFR 60 Subpart Eb requirements. If you have any questions, please do not hesitate to call me at (352) 336-5600.

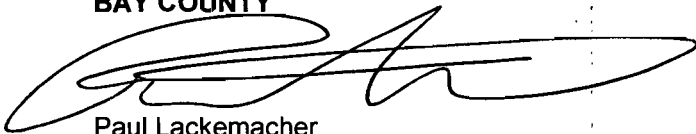
Sincerely,

**GOLDER ASSOCIATES INC.**

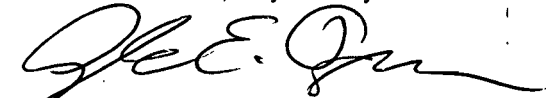


David A. Buff, P.E., Q.E.P.  
Principal Engineer

**BAY COUNTY**



Paul Lackemacher  
Assistant Director, Bay County Public Utilities



Glenn Ogborn  
Solid Waste Superintendent, Responsible Official

cc:

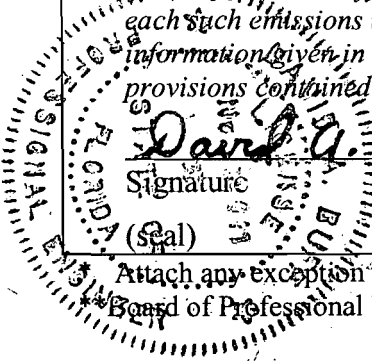
Attachments or Enclosures:

Author/Admin initials

document2

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6026 NW 1<sup>st</sup> Place</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32607</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 336-5600</b> ext. Fax: <b>(352) 336-6603</b>
4. Professional Engineer E-mail Address: <b>dbuff@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  <u>David A. Buff</u> Signature <u>10/22/2009</u> Date

Attach any exception to certification statement.

\*Board of Professional Engineers Certificate of Authorization #00001670.

**ATTACHMENT 1**

BEST AVAILABLE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

LARRY

4APT-ARB

SEP 30 1999

Mr. Howard L. Rhodes, Director  
Department of Environmental Protection  
Division of Air Resources Management  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED

SEP 30 1999

AIR RESOURCES MANAGEMENT

SUBJ: Bay County Resource Recovery Facility

Dear Mr. Rhodes:

This letter is in response to your request for an Environmental Protection Agency (EPA) determination of whether a proposal to derate the two existing municipal waste combustor (MWC) units at the Bay County Resource Recovery Facility (RRF) is acceptable. This proposal was submitted to EPA Region 4 and the Florida Department of Environmental Protection (DEP) on June 16, 1999, and supplemented by information on July 13, 1999. In response to our most recent correspondence, dated July 30, 1999, Bay County submitted further information on August 9, 1999, and participated in a conference call with representatives of EPA and the Florida DEP on August 11, 1999, to discuss details of the derating proposal.

To ensure national consistency, EPA Region 4 consulted with the Office of Enforcement and Compliance Assurance (OECA), the Office of General Counsel (OGC), and the EPA Office of Air Quality Planning and Standards (OAQPS) in preparing this response. Based on our review of the information submitted and the discussions held regarding the proposal, EPA has determined that the Bay County proposal to derate the combustion capacity of each of its two existing MWC units from 255 tons per day to 245 tons per day of municipal solid waste (MSW) is approved in accordance with the operating conditions and monitoring requirements outlined in this correspondence. To finalize this approval, your agency must incorporate these operational and monitoring items as enforceable permit conditions for the Bay County RRF. Derating the units will allow the facility to avoid the requirements set forth in the State of Florida's Clean Air Act (CAA) section 111(d)/129 plan for large MWC units. The Bay County RRF will remain subject to 40 C.F.R. part 60, subpart E (Standards of Performance for Incinerators) and subpart BBBB (Emission Guidelines: Small Municipal Waste Combustion Units), unless modified or reconstructed in the future.

Derated Units: Operating, Testing, and Monitoring Requirements

Bay County's proposal involves physically modifying the MWC units to permanently change the capacity of each unit to below the applicability threshold level of greater than 250 tons

per day for large MWC units. As approved, Bay County will reduce the full load flue gas flow rate and the corresponding steam flow from the units by physically modifying the forced draft (FD) fan wheel, as described in letters dated October 1, 1998, and June 1, 1999, to Bay County from the Howden Fan Company, manufacturer and vendor of the FD fan. Bay County will complete the physical change of the FD fan wheel from an existing "A" blade arrangement to a "C" blade arrangement. The revolutions per minute (rpm), static and dynamic pressures of the FD fan, and unit capacities before and after the modification will be as follows:

<u>Full Load Capacity:</u>	<u>Existing</u>	<u>Derated</u>
FD Fan Wheel - rpm	1404	1404
FD Fan Wheel - Diameter (inches)	50.75	49.38
FD Fan Wheel - Static Pressure (inches H <sub>2</sub> O)	14.25	12.80
FD Fan Wheel - Dynamic Pressure (inches H <sub>2</sub> O)	16.37	14.58
Combustion Air Flow Rate (scfm)	22,800	20,780
Steam Flow (pounds per hour)	68,000	65,333
Tons per day of MSW (at 4500 British thermal units per pound)	255	245

We have determined that the County's proposal to derate its units is acceptable based on agreement by the County to conduct a demonstration test, to monitor the units as provided below, and to the establishment of these operating and monitoring requirements as enforceable permit conditions by your agency. As approved, Bay County must achieve final compliance with all operating restrictions and monitoring requirements for the derated units by December 19, 2000 (the final compliance date of the emission guidelines and the Florida CAA section 111(d)/129 state plan).

A demonstration test will be performed to verify the hourly steam flow rate at full load and establish the maximum demonstrated MWC unit load. As approved, Bay County is required to submit a protocol for testing which includes: (1) testing occurring over a 72-hour period; (2) testing conducted in accordance with the applicable requirements of 40 C.F.R. § 60.8 (Performance tests); and (3) an opportunity for a Florida DEP and/or EPA observer to be present at the demonstration test.

Monitoring will provide assurance that the units are effectively derated. During the demonstration test and after completion of the derating, the affected units will be monitored in accordance with the following requirements:

- (1) Demonstration Test
  - (a) The maximum demonstrated MWC unit load will be the highest 24-hour rolling average MWC unit load calculated from six consecutive 4-hour block arithmetic averages demonstrated during the performance test.

- (b) This maximum MWC unit load is not to exceed 65,333 lb/hr (245 tons per day) for each unit.
  - (c) Steam flow shall not exceed an average of 66,667 lb/hr (250 tons per day) over any 4-hour block averaging period for each unit during the demonstration test.
- (2) Operational Requirements
- (a) The owner or operator shall install, calibrate, maintain, and operate a steam flow meter, measure steam flow in pounds per hour on a continuous basis, and record the output of the monitor.
  - (b) Steam flow shall be calculated in 24-hour rolling averaging periods, calculated from six consecutive 4-hour block arithmetic averaging periods for each unit.
  - (c) Steam flow shall not exceed an average of 65,333 lb/hr over any 24-hour rolling average period for each unit (provided the demonstrated full load steam flow rate/maximum demonstrated MWC unit load is less than or equal to 65,333 lb/hr; otherwise, the full load steam flow rate determined from the demonstration test will be used).
  - (d) Steam flow shall not exceed an average of 66,667 lb/hr over any 4-hour block arithmetic averaging period for each unit.
  - (e) The monitoring data must be maintained for periodic inspections by Florida DEP and/or EPA.
  - (f) Any 24-hour average steam flow in excess of 65,333 lb/hr for each unit (or the full load steam flow rate determined from the demonstration test) must be reported within seven calendar days to Florida DEP and EPA.
  - (g) Any 4-hour block arithmetic average steam flow in excess of 66,667 lb/hr for each unit must be reported within seven calendar days to Florida DEP and EPA.

### Conclusion

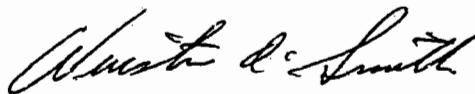
A derated unit should not exceed a threshold applicability level. According to information in the Bay County proposal, the steam output level corresponding to 250 tons per day is equivalent to a steam flow of 66,667 lb/hr for each unit. Therefore, EPA maintains the position that, consistent with prior EPA determinations for derate actions, if this MWC unit exceeds



66,667 lb/hr over any 4-hour block averaging period (demonstration period or operational), the unit would no longer be considered a derated unit. Based on the information presented, and as we stated in our previous correspondence, meetings, and discussions with the Florida DEP and Bay County on the issue of derating, if the Bay County RRF exceeds the steam output level corresponding to 250 tons per day (equivalent to a steam flow of 66,667 lb/hr) after completing the proposed modification to the FD fan wheel, the facility will be required to be in compliance with all applicable federal and state MWC requirements for large MWC units on schedule. Section 129 of the CAA and the federal MWC regulations, as well as the approved Florida section 111(d)/129 plan, require all large MWC units to be in compliance with all applicable requirements or close by December 19, 2000.

If you have any questions regarding this approval, please contact Mr. Scott Davis of the EPA Region 4 staff at (404) 562-9127. Due to litigation filed by Bay County against EPA (Petition for Review dated July 2, 1999, Case No. 99-12083-I, and Petition for Review dated September 28, 1999), if any representative of Bay County or the Bay County RRF has any questions or comments concerning this correspondence, he or she must contact Mr. Joshua Levin of the United States Department of Justice at (202) 514-4198 or Ms. Michiko Kono of the Office of Regional Counsel at (404) 562-9558.

Sincerely,



Winston A. Smith  
Director  
Air, Pesticides and Toxics  
Management Division

cc: James M. Leddy, Plant Manager  
Bay County RRF  
Zofia Kosim, OECA  
Walt Stevenson, OAQPS  
Rick Vetter, OGC  
Joshua Levin, DOJ  
Charles Perry, Hunton & Williams  
Nevin A. Zimmerman, Burke & Blue

## Walker, Elizabeth (AIR)

---

**From:** Mitchell, Bruce  
**Sent:** Monday, October 26, 2009 4:12 PM  
**To:** 'Buff, Dave'  
**Cc:** Vielhauer, Trina; Koerner, Jeff; Walker, Elizabeth (AIR); 'plackemacher@co.bay.fl.us'; 'kencaine@ENGENLLC.com'; 'brookinsr@ENGENLLC.com'; 'Gonzalez, Natalia'; Bradburn, Rick; 'Mcneal.Dave@epamail.epa.gov'  
**Subject:** Receipt of letter for an NSPS applicability determination for the proposed Bay County RRF MSWC Units 1 and 2 rerating.

10/26/09

Good afternoon, Dave. We are in receipt of your letter with attachment (received October 23, 2009) regarding the rerating of the municipal solid waste combustors (MSWC) Units 1 and 2 located at the Bay Count Resource Recovery Facility. We are going to forward your letter under the cover letter of Ms. Trina Vielhauer, Chief, Bureau of Air Regulation, to the U.S. EPA Region 4 (EPA) and request an NSPS applicability determination for the proposed changes to the MSWC Units 1 and 2. Once we receive a response from the EPA, we will forward a copy to you if you were not copied on their letter. Upon receipt of their letter and the ruling is favorable, then we will be expecting an application for an air construction permit to effect changes in the applicable regulations and their capacities (if workable, then the processing protocol might include a concurrent Title V permit revision.). If the ruling is not favorable, then we would like to discuss with you and your client regarding the future operation of the MSWC units - as currently permitted or with changes sanctioned under an air construction permitting action.

If there are any questions, please give me a call at 850/413-9198. Take care.

Bruce Mitchell

## Walker, Elizabeth (AIR)

---

**From:** Buff, Dave [DBuff@GOLDER.com]  
**Sent:** Monday, October 26, 2009 8:25 PM  
**To:** Mitchell, Bruce  
**Cc:** Vielhauer, Trina; Koerner, Jeff; Walker, Elizabeth (AIR); plackemacher@co.bay.fl.us; kencaine@ENGENLLC.com; brookinsr@ENGENLLC.com; Gonzalez, Natalia; Bradburn, Rick; Mcneal.Dave@epamail.epa.gov  
**Subject:** RE: Receipt of letter for an NSPS applicability determination for the proposed Bay County RRF MSWC Units 1 and 2 rerating.

OK, thanks Bruce, we appreciate the help. Look forward to hearing back from EPA.

David A. Buff, P.E., Q.E.P. | Principal Engineer | Golder Associates Inc.  
6026 NW 1st Place, Gainesville, Florida, USA 32607  
Tel: +1 (352) 336-5600 ext. 21145 Fax: +1 (352) 336-6603 | Cell: +1 352 514-5600 |  
E: [dbuff@golder.com](mailto:dbuff@golder.com) | [www.golder.com](http://www.golder.com)

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**From:** Mitchell, Bruce [mailto:[Bruce.Mitchell@dep.state.fl.us](mailto:Bruce.Mitchell@dep.state.fl.us)]  
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**To:** Buff, Dave  
**Cc:** Vielhauer, Trina; Koerner, Jeff; Walker, Elizabeth (AIR); plackemacher@co.bay.fl.us; kencaine@ENGENLLC.com; brookinsr@ENGENLLC.com; Gonzalez, Natalia; Bradburn, Rick; Mcneal.Dave@epamail.epa.gov  
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If there are any questions, please give me a call at 850/413-9198. Take care.

Bruce Mitchell

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Friday, October 30, 2009 11:43 AM  
**To:** 'neeley.doug@epa.gov'  
**Cc:** 'mcneal.dave@epa.gov'; 'goff.keith@epa.gov'; Bradburn, Rick; 'plackemacher@co.bay.fl.us'; 'dbuff@golder.com'; Koerner, Jeff; Mitchell, Bruce  
**Subject:** Request for Applicability Determination, 40 CFR 60, Subpart Eb - Bay County Resource Recovery Facility  
**Attachments:** Mr. Doug Neeley, US EPA Region 4.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

**Tracking:**

## Livingston, Sylvia

---

**From:** Paul Lackemacher [plackemacher@baycountyfl.gov]  
**Sent:** Friday, October 30, 2009 12:12 PM  
**To:** Livingston, Sylvia; neeley.doug@epa.gov  
**Cc:** mcneal.dave@epa.gov; goff.keith@epa.gov; Bradburn, Rick; dbuff@golder.com; Koerner, Jeff; Mitchell, Bruce; Lucy Collins  
**Subject:** RE: Request for Applicability Determination, 40 CFR 60, Subpart Eb - Bay County Resource Recovery Facility

We acknowledge receipt and *can view the documents*

Respectfully,  
Paul Lackemacher  
Assistant Director  
Bay County Utility Services

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, October 30, 2009 10:43 AM  
**To:** neeley.doug@epa.gov  
**Cc:** mcneal.dave@epa.gov; goff.keith@epa.gov; Bradburn, Rick; Paul Lackemacher; dbuff@golder.com; Koerner, Jeff; Mitchell, Bruce  
**Subject:** Request for Applicability Determination, 40 CFR 60, Subpart Eb - Bay County Resource Recovery Facility

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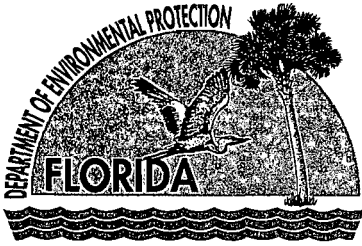
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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few*



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

October 30, 2009

Mr. Doug Neeley, Chief  
Air and Toxics Monitoring Branch  
United States Environmental Protection Agency, Region 4  
61 Forsythe Street  
Atlanta, Georgia 30303-8909

RE: Request for Applicability Determination, 40 CFR 60, Subpart Eb  
Bay County Resource Recovery Facility  
Municipal Waste Combustors Units 1 and 2

Dear Mr. Neeley:

On October 23, 2009, we received an applicability determination request regarding the Bay County Resource Recovery Facility's municipal waste combustors (MWC) Units 1 and 2. In a meeting with us on October 5, representatives for the facility proposed to rerate the MWC units to the original charging capacity of 255 tons per day of municipal solid waste (MSW) per unit. In a letter dated September 30, 2001, EPA Region 4 specified the physical changes that the facility had to implement to derate the two MWC units from 255 tons MSW per day per unit to 245 tons MSW per day per unit, essentially reclassifying these from large MWC units to small MWC units. The company believes that the regulations of Title 40 of the Code of Federal Regulations Part 60 (40 CFR 60), Subpart Cb would apply after the rerating, but that the regulations of 40 CFR 60, Subpart Eb would not apply pursuant to 40 CFR 60.14(e). Information (see attachment) has been provided in the letter to support this position.

Is the proposed activity exempt from the applicability of the NSPS of 40 CFR 60, Subpart Eb, if the units are rerated in a permit for the full design capacity? There has been some preliminary discussions regarding this issue with Mr. David McNeal and Mr. Keith Goff of your staff. If there are any questions regarding this issue, please contact Mr. Bruce Mitchell, permitting engineer, at 850/413-9198, or Jeff Koerner, Administrator of the New Source Review Section, at 850/921-9536. Please provide the Department with a copy of any correspondence regarding this determination.

Sincerely,

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

Attachments

TLV/jfk/rbm

Copies of these documents were sent to the following people electronically.

cc: Mr. Doug Neeley, U.S. EPA, Region 4 ([neeley.doug@epa.gov](mailto:neeley.doug@epa.gov))  
Mr. Dave McNeal, U.S. EPA, Region 4 ([mcneal.dave@epa.gov](mailto:mcneal.dave@epa.gov))  
Mr. Keith Goff, U.S. EPA, Region 4 ([goff.keith@epa.gov](mailto:goff.keith@epa.gov))  
Mr. Rick Bradburn, DEP Northwest District ([rick.bradburn@dep.state.fl.us](mailto:rick.bradburn@dep.state.fl.us))  
Mr. Paul Lackemacher, Bay County Utility Services ([plackemacher@co.bay.fl.us](mailto:plackemacher@co.bay.fl.us))  
Mr. Ken Caine, ENGEN LLC ([cainek@ENGENLLC.com](mailto:cainek@ENGENLLC.com))  
Mr. David Buff, Golder Associates Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))



October 15, 2009

Florida Department of Environmental Protection  
Department of Air Resources Management  
2600 Blair Stone Road  
MS #5505  
Tallahassee, FL 32399-2400

RECEIVED 0938-7544

OCT 23 2009

BUREAU OF AIR REGULATION

Attention: Ms. Trina Vielhauer, Chief, Bureau of Air Regulation

**RE: BAY COUNTY UTILITIES SERVICE DEPARTMENT  
BAY RESOURCE MANAGEMENT CENTER  
FACILITY ID NO. 0050031  
BAY COUNTY RE-RATE PROJECT**

Dear Ms. Vielhauer:

Bay County Utilities Service Department (Bay County) currently operates the Bay County Waste-to-Energy Facility (BCWtE) under Title V air operating permit No. 0050031-010-AV. The facility includes two identical Municipal Waste Combustor (MWC) emission units with mass burn rotary waterwall technology.

Bay County is proposing to rerate the MWC units at the facility to their original charging capacity of 255 tons per day (TPD) of municipal solid waste (MSW @ 4500 BTU/Lb) per unit. This will correspond to a steam production limit of 68,000 pounds per hour (lb/hr) (24-hour average). The purpose of this letter is to request an applicability determination for the New Source Performance Standards (NSPS) contained in Title 40 of the Code of Federal Regulations, Part 60 (40 CFR 60), Subparts Cb and Eb, which apply to MWC combustion units greater than 250 TPD MSW charging capacity.

#### **History of Facility**

The facility was constructed under the Florida Department of Environmental Protection (FDEP) permits AC 03-84703 and AC 03-84704, issued September 24, 1984. The emission units' initial startup date was May 1, 1987. The control equipment for the MWC units included an electrostatic precipitator (ESP) on each unit. DEP permits AC 03-145061, AC 03-152196, and PSD-FL-129 were issued October 14, 1988 to increase the MSW throughput to 255 tons per day (TPD) per unit.

Subsequently, on December 19, 1995 and amended on August 25, 1997, the U.S. Environmental Protection Agency (EPA) promulgated 40 CFR 60, Subpart Cb, "Emission Guidelines and Compliance Times for Municipal Waste Combustors That Are Constructed on or Before December 19, 1995". This final rule required MWC units with a combustion capacity greater than 250 TPD MSW to comply with new emission limits. These new emissions limits would require the facility to replace the existing ESPs with spray dryers and baghouses to control acid gases and particulate matter. The compliance date for these modifications was December 19, 2000.

At the time of the promulgation of Subpart Cb, Bay County did not desire to incur the large expense (and cost to the taxpayers) of complying with Subpart Cb. As a result, in a letter dated June 16, 1999, Bay County requested for a determination from the EPA to derate the two MWC units from 255 TPD to 245 TPD, with a corresponding steam production limit of 65,333 pounds per hour (lb/hr)(24-hour average). By derating the units, Bay County would not be subject to Subpart Cb.



Golder Associates Inc.  
6026 NW 1st Place  
Gainesville, FL 32607 USA  
Tel: (352) 336-5600 Fax: (352) 336-6603 www.golder.com





EPA approved the request to derate the facility in a letter to the DEP dated September 30, 1999 (see Attachment 1). The letter outlined a set of requirements for derating the MWC units. Bay County accomplished the requirements, which included the modification of the forced draft fan wheel from a "A" blade arrangement to a "C" blade arrangement, and a demonstration test to verify that the maximum MWC unit load would not exceed 65,333 lb/hr, 24-hr rolling average and 66,667 lb/hr, 4-hr block average. The changes were required to be implemented by December 19, 2000, which was the compliance date for Subpart Cb.

Subsequently, the facility implemented the changes and the required monitoring. Title V air operation permit No. 0050031-002-AV was issued on August 1, 2000, incorporating the new operating limitations. By derating the MWC units, the facility did not become subject to Subpart Cb, and the cost of physical and operational changes associated with the rule was avoided.

On December 6, 2000, EPA promulgated 40 CFR 60, Subpart BBBB, "Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed On or Before August 30, 1999". This rule applied to MWC units with a capacity of less than 250 TPD MSW, and required the Bay County units to meet new emission limits. The compliance date for this rule was December 6, 2005. Subsequently, on March 5, 2004, Permit No. 0050031-009-AC was issued to replace the ESP on each of the two combustors with an acid gas scrubber and a fabric filter baghouse, in addition to a lime storage and slaking equipment, a carbon storage and injection system, ID fans, new stacks and associated appurtenances. The equipment installation was completed by June, 2005.

Permit No. 0050031-011-AC, issued June 13, 2005, included the new emission limitations under Subpart BBBB, deleted the limitation and test method for beryllium, and established new operational requirements. The facility was in compliance with Subpart BBBB on November 16, 2005.

The facility is currently operating under Permit No. 0050031-010-AV issued August 1, 2005. According to facility records, the 4-hr average steam rate limit has never been exceeded since the issuance of the de-rate permit; i.e. from 1999 through the present.

#### **Request to Re-Rate Facility:**

As a result of having to comply with the Subpart BBBB requirements, Bay County has already installed the equipment necessary to meet the requirements of Subpart Cb. As a result, Bay County now desires to increase the units' capacity back to the facility's original capacity of 255 TPD MSW (@ 4500 BTU/Lb) per unit. The only physical change that may be necessary to the units to accomplish the re-rating would be the replacement of the fan blades, which were changed when the facility was de-rated in 1999. However, future operation of the unit at the higher rates may indicate new fan blades are necessary, or are desirable from an energy efficiency standpoint. The new fan blades may be required in order to provide enough combustion air to the units. Also, changing the fan blades would increase the capacity of the fans to deliver combustion air to the boilers, which could allow the fans to operate at slower speeds, and increase the energy efficiency of the fans.

Subpart Eb of 40 CFR 60 applies to large (>250 TPD MSW) MWC units that commenced construction after September 20, 1994, or for which modification or reconstruction was commenced after June 19, 1996. This definition of modification under 40 CFR 60.2 is as follows:

*Modification means any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.*

The proposed re-rate of the Bay County units would constitute a "modification" under this definition, since air emissions on a lb/hr basis will be increasing due to the additional MSW combusted. However,

according to 40 CFR 60.14(e), the following shall not, by themselves, be considered modifications under this part:

(2) "An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility".

Capital expenditure is defined in 60.2 as follows:

"Capital expenditure means an expenditure for a physical or operational change to an existing facility which exceeds the product of the applicable "annual asset guideline repair allowance percentage" specified in the latest edition of Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined by section 1012 of the Internal Revenue Code. However, the total expenditure for a physical or operational change to an existing facility must not be reduced by any "excluded additions" as defined in IRS Publication 534, as would be done for tax purposes."

The cost of replacement fan blades for both units, if required, is estimated at \$45,640.00, which is much less than the criteria which defines a capital expenditure. Therefore, the proposed re-rate project does not constitute a modification for purposes of the new source performance standards. As a result, Subpart Cb would apply to the facility after the re-rate is implemented.

We request concurrence from FEP/EPA that the facility re-rate project will trigger the requirements of 40 CFR 60 Subpart Cb, and will not trigger 40 CFR 60 Subpart Eb requirements. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

**GOLDER ASSOCIATES INC.**




David A. Buff, P.E., Q.E.P.  
Principal Engineer

**BAY COUNTY**



Paul Lackemacher  
Assistant Director, Bay County Public Utilities



Glenn Ogborn  
Solid Waste Superintendent, Responsible Official

cc:

Attachments or Enclosures:

Author/Admin initials

document2

## APPLICATION INFORMATION

### Professional Engineer Certification

1. Professional Engineer Name: <b>David A. Buff</b> Registration Number: <b>19011</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates Inc.**</b> Street Address: <b>6026 NW 1<sup>st</sup> Place</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32607</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 336-5600</b> ext. Fax: <b>(352) 336-6603</b>
4. Professional Engineer E-mail Address: <b>dbuff@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  <i>David A. Buff</i> Signature _____ Date <u>10/22/2009</u> (seal)

\* Attach any exception to certification statement.

\*\*Board of Professional Engineers Certificate of Authorization #00001670.

**ATTACHMENT 1**

BEST AVAILABLE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

LARRY

4APT-ARB

SEP 30 1999

Mr. Howard L. Rhodes, Director  
Department of Environmental Protection  
Division of Air Resources Management  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED

SEP 30 1999

AIR RESOURCES MANAGEMENT

SUBJ: Bay County Resource Recovery Facility

Dear Mr. Rhodes:

This letter is in response to your request for an Environmental Protection Agency (EPA) determination of whether a proposal to derate the two existing municipal waste combustor (MWC) units at the Bay County Resource Recovery Facility (RRF) is acceptable. This proposal was submitted to EPA Region 4 and the Florida Department of Environmental Protection (DEP) on June 16, 1999, and supplemented by information on July 13, 1999. In response to our most recent correspondence, dated July 30, 1999, Bay County submitted further information on August 9, 1999, and participated in a conference call with representatives of EPA and the Florida DEP on August 11, 1999, to discuss details of the derating proposal.

To ensure national consistency, EPA Region 4 consulted with the Office of Enforcement and Compliance Assurance (OECA), the Office of General Counsel (OGC), and the EPA Office of Air Quality Planning and Standards (OAQPS) in preparing this response. Based on our review of the information submitted and the discussions held regarding the proposal, EPA has determined that the Bay County proposal to derate the combustion capacity of each of its two existing MWC units from 255 tons per day to 245 tons per day of municipal solid waste (MSW) is approved in accordance with the operating conditions and monitoring requirements outlined in this correspondence. To finalize this approval, your agency must incorporate these operational and monitoring items as enforceable permit conditions for the Bay County RRF. Derating the units will allow the facility to avoid the requirements set forth in the State of Florida's Clean Air Act (CAA) section 111(d)/129 plan for large MWC units. The Bay County RRF will remain subject to 40 C.F.R. part 60, subpart E (Standards of Performance for Incinerators) and subpart BBBB (Emission Guidelines: Small Municipal Waste Combustion Units), unless modified or reconstructed in the future.

Derated Units: Operating, Testing, and Monitoring Requirements

Bay County's proposal involves physically modifying the MWC units to permanently change the capacity of each unit to below the applicability threshold level of greater than 250 tons

per day for large MWC units. As approved, Bay County will reduce the full load flue gas flow rate and the corresponding steam flow from the units by physically modifying the forced draft (FD) fan wheel, as described in letters dated October 1, 1998, and June 1, 1999, to Bay County from the Howden Fan Company, manufacturer and vendor of the FD fan. Bay County will complete the physical change of the FD fan wheel from an existing "A" blade arrangement to a "C" blade arrangement. The revolutions per minute (rpm), static and dynamic pressures of the FD fan, and unit capacities before and after the modification will be as follows:

<u>Full Load Capacity:</u>	<u>Existing</u>	<u>Derated</u>
FD Fan Wheel - rpm	1404	1404
FD Fan Wheel - Diameter (inches)	50.75	49.38
FD Fan Wheel - Static Pressure (inches H <sub>2</sub> O)	14.25	12.80
FD Fan Wheel - Dynamic Pressure (inches H <sub>2</sub> O)	16.37	14.58
Combustion Air Flow Rate (scfm)	22,800	20,780
Steam Flow (pounds per hour)	68,000	65,333
Tons per day of MSW (at 4500 British thermal units per pound)	255	245

We have determined that the County's proposal to derate its units is acceptable based on agreement by the County to conduct a demonstration test, to monitor the units as provided below, and to the establishment of these operating and monitoring requirements as enforceable permit conditions by your agency. As approved, Bay County must achieve final compliance with all operating restrictions and monitoring requirements for the derated units by December 19, 2000 (the final compliance date of the emission guidelines and the Florida CAA section 111(d)/129 state plan).

A demonstration test will be performed to verify the hourly steam flow rate at full load and establish the maximum demonstrated MWC unit load. As approved, Bay County is required to submit a protocol for testing which includes: (1) testing occurring over a 72-hour period; (2) testing conducted in accordance with the applicable requirements of 40 C.F.R. § 60.8 (Performance tests); and (3) an opportunity for a Florida DEP and/or EPA observer to be present at the demonstration test.

Monitoring will provide assurance that the units are effectively derated. During the demonstration test and after completion of the derating, the affected units will be monitored in accordance with the following requirements:

- (1) Demonstration Test
  - (a) The maximum demonstrated MWC unit load will be the highest 24-hour rolling average MWC unit load calculated from six consecutive 4-hour block arithmetic averages demonstrated during the performance test.

- (b) This maximum MWC unit load is not to exceed 65,333 lb/hr (245 tons per day) for each unit.
- (c) Steam flow shall not exceed an average of 66,667 lb/hr (250 tons per day) over any 4-hour block averaging period for each unit during the demonstration test.

(2) Operational Requirements

- (a) The owner or operator shall install, calibrate, maintain, and operate a steam flow meter, measure steam flow in pounds per hour on a continuous basis, and record the output of the monitor.
- (b) Steam flow shall be calculated in 24-hour rolling averaging periods, calculated from six consecutive 4-hour block arithmetic averaging periods for each unit.
- (c) Steam flow shall not exceed an average of 65,333 lb/hr over any 24-hour rolling average period for each unit (provided the demonstrated full load steam flow rate/maximum demonstrated MWC unit load is less than or equal to 65,333 lb/hr; otherwise, the full load steam flow rate determined from the demonstration test will be used).
- (d) Steam flow shall not exceed an average of 66,667 lb/hr over any 4-hour block arithmetic averaging period for each unit.
- (e) The monitoring data must be maintained for periodic inspections by Florida DEP and/or EPA.
- (f) Any 24-hour average steam flow in excess of 65,333 lb/hr for each unit (or the full load steam flow rate determined from the demonstration test) must be reported within seven calendar days to Florida DEP and EPA.
- (g) Any 4-hour block arithmetic average steam flow in excess of 66,667 lb/hr for each unit must be reported within seven calendar days to Florida DEP and EPA.

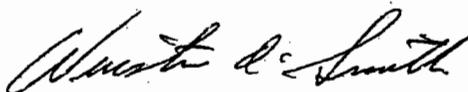
Conclusion

A derated unit should not exceed a threshold applicability level. According to information in the Bay County proposal, the steam output level corresponding to 250 tons per day is equivalent to a steam flow of 66,667 lb/hr for each unit. Therefore, EPA maintains the position that, consistent with prior EPA determinations for derate actions, if this MWC unit exceeds

66,667 lb/hr over any 4-hour block averaging period (demonstration period or operational), the unit would no longer be considered a derated unit. Based on the information presented, and as we stated in our previous correspondence, meetings, and discussions with the Florida DEP and Bay County on the issue of derating, if the Bay County RRF exceeds the steam output level corresponding to 250 tons per day (equivalent to a steam flow of 66,667 lb/hr) after completing the proposed modification to the FD fan wheel, the facility will be required to be in compliance with all applicable federal and state MWC requirements for large MWC units on schedule. Section 129 of the CAA and the federal MWC regulations, as well as the approved Florida section 111(d)/129 plan, require all large MWC units to be in compliance with all applicable requirements or close by December 19, 2000.

If you have any questions regarding this approval, please contact Mr. Scott Davis of the EPA Region 4 staff at (404) 562-9127. Due to litigation filed by Bay County against EPA (Petition for Review dated July 2, 1999, Case No. 99-12083-I, and Petition for Review dated September 28, 1999), if any representative of Bay County or the Bay County RRF has any questions or comments concerning this correspondence, he or she must contact Mr. Joshua Levin of the United States Department of Justice at (202) 514-4198 or Ms. Michiko Kono of the Office of Regional Counsel at (404) 562-9558.

Sincerely,



Winston A. Smith  
Director  
Air, Pesticides and Toxics  
Management Division

cc: James M. Leddy, Plant Manager  
Bay County RRF  
Zofia Kosim, OECA  
Walt Stevenson, OAQPS  
Rick Vetter, OGC  
Joshua Levin, DOJ  
Charles Perry, Hunton & Williams  
Nevin A. Zimmerman, Burke & Blue





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4-  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

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DEC 24 2009

DEC 21 2009

BUREAU OF AIR REGULATION

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Ms. Vielhauer:

Thank you for your letter of October 30, 2009, which requested a determination regarding the applicability of New Source Performance Standards (NSPS) to the Bay County Resource Recovery Facility (BCRRF) in Panama City, Florida. According to your letter, Bay County plans to increase the charging capacity of each of the two municipal waste combustor (MWC) units at the plant from 245 ton per day (TPD) to 255 TPD. Based upon our review of information provided with your letter, the U.S. Environmental Protection Agency (EPA) Region 4 cannot conclusively determine which of two potentially applicable NSPS that BCRRF will be subject to following the planned increase in charging capacity. However, below are recommendations on information that you should obtain from Bay County in order to finalize a determination regarding which regulation will apply following the increase in charging rate.

### History

The Florida Department of Environmental Protection (FL DEP) issued the original construction permits for BCRRF on September 24, 1984, and the plant started up on May 1, 1987. Under the terms of subsequent permits issued by the FL DEP on October 14, 1988, the charging capacity limit for each of the two units at BCRRF was increased to 255 TPD. Once the charging capacity of the units exceeded 250 TPD, BCRRF became subject to 40 CFR Part 60, Subpart Cb (Emissions Guidelines and Compliance Times for Large Municipal waste Combustors That Are Constructed on or Before September 20, 1994). This regulation had a compliance date of December 19, 2000.

Because Bay County did not want to incur the expense of installing the control equipment that would be needed in order to comply with Subpart Cb, the County requested approval of a derate that would reduce the charging capacity of the units at BCRRF to 245 TPD. The proposed derate was based upon modifying the forced draft fans at the plant in order to decrease the amount of combustion air available to each MWC unit. This derate was approved in an EPA Region 4 letter dated September 30, 1999, and by reducing the capacity of the units to less than 250 TPD, the County avoided applicability under Subpart Cb.

On December 6, 2000, EPA promulgated 40 CFR Part 60, Subpart BBBB (Emission Guidelines and Compliance Times for Small Municipal Waste Combusters Constructed on or Before August 30, 1999). This regulation had a compliance deadline of December 6, 2005. Based upon the date of construction and the charging capacity at BCRRF, the MWC units at the plant were subject to Subpart BBBB. Under the terms of a permit issued by FL DEP on March 5, 2004, the County installed several pieces of equipment needed in order to comply with the new regulation. This equipment included acid gas scrubbers, fabric filter baghouses, lime storage and slaking equipment, a carbon storage and injection system, induced draft fans, and new exhaust stacks. Equipment installation was completed by June 2005, and compliance was achieved by November 16, 2005. Therefore, Bay County met the December 6, 2005, compliance date in Subpart BBBB.

### **Re-rate Request**

Your October 30 letter included an October 15, 2009, letter from Golder Associates, Incorporated (Golder) in which Golder indicated that Bay County wants to increase the charging capacity of the MWC units at BCRRF back to the previous rate of 255 TPD. According to Golder, the only change that needs to be made in order to return the charging capacity of the units to their previous rate is the replacement of the fan blades that were installed in order to derate the units under the terms of the EPA approval dated September 30, 1999. Since increasing the capacity of the BCRRF will increase the emission rate of several pollutants, the planned re-rate has the potential to trigger the applicability of 40 CFR Part 60, Subpart Eb (Standards of Performance for Large Municipal Waste Combusters for Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996). In its letter, Golder maintains that the two units at the BCRRF will be subject to Subpart Cb following the re-rate.

Although most of the emission limits under Subparts Cb and Eb, are similar, the carbon monoxide (CO) limit for BCRRF under Subpart Eb is more stringent than the one under Subpart Cb. Under Subpart Eb, the CO limit for BCRRF would be 100 parts per million (ppm) and under Subpart Cb, the CO limit would be 250 ppm. Because of this difference in CO limits, it is important to determine which of the regulations will apply following the re-rate. Based upon our review of Golder's letter and provisions in the 40 CFR Part 60, Subpart A (General Provisions), the primary issue that must be resolved in order to determine NSPS applicability to BCRRF is whether or not replacing the fan blades at the plant will constitute a capital expenditure.

Under 40 CFR 60.14, a physical change or change in the operation of an existing facility that results in an emission rate increase of a regulated pollutant constitutes a modification that can trigger NSPS applicability. However, 40 CFR 60.14(e) lists a number of changes that does not trigger NSPS applicability even if they cause an increase in emissions. Among these exemptions is one in 40 CFR 60.14(e)(2) which lists emission rate increases resulting from production rate increases that are accomplished without a capital expenditure. The term capital expenditure is defined in 40 CFR 60.2 as "... an expenditure for a physical or operation change which exceeds the product of the applicable "annual asset guideline repair allowance percentage" specified in the latest Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined in section 1012 of the Internal Revenue Code. However, the total expenditure

for a physical or operational change to an existing facility must not be reduced by any "excluded additions" as defined in IRS Publication 534, as would be done for tax purposes." According to the enclosed EPA determination issued on April 7, 1998, the "basis" used for determining the applicability of the exemption in 40 CFR 60.14(e)(2) is the cost of the property, adjusted to reflect capital improvements, casualty losses, and defunct equipment. Additionally, the determination indicates that the existing facility's basis should not be adjusted to account for depreciation.

Since the applicability date for modified facilities under Subpart Eb is June 19, 1996, BCRRF would be an existing facility with respect to this rule. Therefore, the emission rate increase resulting from the planned re-rate would trigger the applicability of Subpart Eb unless one of the exemptions in 40 CFR 60.14(e) applies. Although Golder's letter discusses the exemption in 40 CFR 60.14(e)(2), it does not contain enough information for us to determine whether the cost of replacing the fan blades would constitute a capital expenditure. According to Golder, the estimated cost of replacing the fan blades that were installed in order to derate the MWC units is \$45,640. However, the letter does not provide any information regarding the "basis" for the MWC units at BCRRF and without this information, we cannot determine whether the exemption in 40 CFR 60.14(e)(2) applies.

The latest edition of IRS Publication 534 was published in December 1984 and the annual asset guideline repair allowance listed for waste reduction and resource recovery plants in this document is 15 percent. Based upon this figure, the cost of the changes required to re-rate BCRRF would constitute a capital expenditure if the basis for the facility is less than \$284,260. If the costs of the changes constitute a capital expenditure, the exemption in 40 CFR 60.14(e)(2) would not apply and the re-rate would trigger applicability under Subpart Eb. Since the re-rate will increase the charging capacity of the units at BCRRF to more than 250 TPD, the units will become subject to Subpart Cb if the exemption in 40 CFR 60.14(e)(2) does apply.

### **Recommendation**

Since it is necessary to know the basis for BCRRF in order to determine regulatory applicability, we recommend that you ask Bay County to provide information regarding the facility's basis. When calculating the basis, the County should follow the guidance in the EPA determination issued on April 7, 1998. If the basis for the facility exceeds \$284,260, the exemption in 40 CFR 60.14(e)(2) will apply, and the re-rated facility will be subject to Subpart Cb. If the basis for the facility is less than \$264,260, the re-rated facility will be subject to Subpart Eb. Because the basis that would trigger the exemption in 40 CFR 60.14(e)(2) is relatively low, the most likely outcome is that Subpart Cb will apply following the re-rate. However, it would be better to obtain the information needed in order to make a determination than it would be to simply assume that Subpart Cb will apply following the re-rate.

If you have any questions about the determination provided in this letter, please contact David McNeal of the EPA Region 4 staff at (404) 562-9102.

Sincerely,



Kenneth R. Lapierre  
Acting Director  
Air, Pesticides and Toxics  
Management Division

Enclosure

cc: Dennis Mitchell, FL DEP

David Buff,  
Golder Associates, Inc.

existing facility." 39 Fed. Reg. at 36948.

In promulgating these amendments, EPA sought to further clarify the term "capital expenditure" by incorporating the use of Internal Revenue Service Publication 534 and Section 1012 of the Internal Revenue Code as means for determining whether there was a capital expenditure. Title 40 of the Code of Federal Regulations 60.2 now defines a "capital expenditure" as:

"an expenditure for a physical or operational change to any existing facility which exceeds the product of the applicable 'annual asset guideline repair allowance percentage' [AAGRAP] specified in the latest edition of the Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined by section 1012 of the Internal Revenue Code...." See 40 Fed. Reg. 58416, 5841 8 (Dec. 16, 1975) (emphasis added).

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It is worth noting that the latest version of IRS Publication 534 that contains a complete list of AAGRPs is the December 1984 edition. The IRS no longer publishes these guideline repair allowances in its Publication 534. Therefore, EPA recommends the use of the December 1984 edition for this purpose and will not construe the phrase "latest edition" in the definition of capital expenditure to refer to more recent versions of the publication.

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I appreciate this opportunity to be of service and trust this is helpful to you.

Sincerely,  
Original signed by  
Henry Thomas for

John Seitz  
Director  
Office of Air Quality Planning and Standards

cc: Louise Gross, Region V Counsel  
Ed Wojciechowski, Region V



http://cfpub.epa.gov/adi/index.cfm?CFID=11451148&CFTOKEN=35060449&jsessionid=2630a0e44df74a24be3201a4d5b12726b7c78?requesttimeout=180  
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### Determination Detail

Control Number: 9900074

**Category:** NSPS  
**EPA Office:** OAQPS  
**Date:** 04/07/1998  
**Title:** NSPS Applicability--Modifications & Capital Expenditures  
**Recipient:** William Guerry  
**Author:** John Seitz  
**Comments:**

**Subparts:** Part 60, A                      General Provisions

**References:** 60.14(e)(2)  
60.2

#### Abstract:

Q. May depreciation be accounted for in the calculation of an existing facility's "basis" for the purpose of determining whether an expenditure meets the definition of a "capital expenditure" under the NSPS General Provisions, 40 C.F.R. § 60.2, and evaluating whether to apply the exemption in 40 C.F.R. § 60.14(e)(2)?

A. No. Depreciation may not be accounted for in determining an existing facility's basis.

#### Letter:

Mr. William M. Guerry, Jr.  
 Collier, Shannon, Rill & Scott, PLLC  
 3050 K Street, N.W.  
 Suite 400  
 Washington, D. C. 20007

Dear Mr. Guerry:

We apologize for taking so long in responding to your June 17, 1997 letter regarding the U.S. Environmental Protection Agency's (EPA) interpretation of the exemption in 40 C.F.R. 60.14(e)(2) for the New Source Performance Standards (NSPS) modification provisions. As you may know, there is a considerable amount of history on this rather complicated subject. In addition, this issue affects several offices within the EPA and it has taken us longer than expected to coordinate a response to your letter.

In your letter, you requested clarification on whether depreciation should be accounted for in the calculation of an existing facility's "basis" for the purpose of determining whether an expenditure meets the definition of a "capital expenditure" under the NSPS General Provisions, 40 C.F.R. 60.2, and evaluating whether to apply the exemption provided for in 40 C.F.R. 60.14(e)(2). As discussed below, EPA does not allow depreciation to be accounted for in determining an existing facility's basis.

To address this issue fully, it is necessary to consider the exemption within the context of the modification rules and the NSPS program in general, and to understand the original intent of the proposed exemption. Congress' intent in creating the modification provision of section 111(a) of the Clean Air Act was to subject certain facilities that increase emissions to "standards of performance" or NSPS. Section 111(a)(4) of the Act defines a modification as "... any physical change in, or change in method of operation of, a stationary source which increases the amount of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted." In promulgating the modification provisions under 40 C.F.R. part 60, EPA exercised discretion in interpreting the statutory definition of modification to exclude certain actions. One such action is described in 60.14(e)(2), which states that the following shall not be considered a modification by itself: "An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure."

When EPA promulgated the first NSPS regulations in 1971, this exemption appeared in the definition of "modification." Title 40 of the Code of Federal Regulations (C.F.R.) 60.2(h)(2)(i) stated that the following would not be considered a change in the method of operation for the purposes of the modification provisions: "an increase in the production rate, if such increase does not exceed the operating design capacity of the affected facility." See 36 Fed. Reg. 24876, 24877 (Dec. 23, 1971). The EPA's intent was to allow for normal fluctuations in production rates that would be within a source's design capacity without triggering NSPS requirements.

On October 15, 1974, EPA proposed amendments to the modification provisions and added a new section, 40 C.F.R. 60.14(e), which set forth operational or physical changes which would not be considered modifications. In these amendments, EPA was clarifying the exemption in question by using capital expenditures as the criterion, in lieu of operating design capacity. See 39 Fed. Reg. 36946, 36 948 (Oct. 15, 1974). These amendments did not change the original intent of the exemption, but rather were designed to facilitate its implementation. The preamble to the proposed rule explained the new wording as follows:

"The exemption of increases in production rate is no longer dependent upon the operating design capacity. This term is not easily defined, and for certain industries the 'design capacity' bears little relationship to the actual operating capacity of the facility. The proposed exemption implicitly defines 'design operating capacity' as that production rate which can be accomplished without making major capital expenditures on the stationary source containing the

existing facility." 39 Fed. Reg. at 36948.

In promulgating these amendments, EPA sought to further clarify the term "capital expenditure" by incorporating the use of Internal Revenue Service Publication 534 and Section 1012 of the Internal Revenue Code as means for determining whether there was a capital expenditure. Title 40 of the Code of Federal Regulations 60.2 now defines a "capital expenditure" as:

"an expenditure for a physical or operational change to any existing facility which exceeds the product of the applicable 'annual asset guideline repair allowance percentage' [AAGRAP] specified in the latest edition of the Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined by section 1012 of the Internal Revenue Code...." See 40 Fed. Reg. 58416, 58418 (Dec. 16, 1975) (emphasis added).

Section 1012 of the Internal Revenue Code defines the basis of property as the "...cost of such property except as otherwise provided in this subchapter and [other specified subchapters]...". Other sections in the same subchapter describe how to adjust the original cost basis when determining the gain or loss from the sale of property; however, they do not address what, if any, adjustments should be made in a regulatory context such as this. EPA's reading of this section for the purpose of the NSPS program is that the "basis" is the cost of the property, as adjusted to reflect capital improvements, casualty losses, and defunct equipment. This reading is consistent with the original intent of the exemption, as these adjustments are related to operating capacity. In contrast, taking into account depreciation would be inconsistent with the original intent of the exemption, as depreciated equipment may remain fully functional.

It is worth noting that the latest version of IRS Publication 534 that contains a complete list of AAGRAPs is the December 1984 edition. The IRS no longer publishes these guideline repair allowances in its Publication 534. Therefore, EPA recommends the use of the December 1984 edition for this purpose and will not construe the phrase "latest edition" in the definition of capital expenditure to refer to more recent versions of the publication.

In conclusion, when calculating an existing facility's basis for the purposes of a "capital expenditure" evaluation, depreciation should not be considered. However, an existing facility's basis should be adjusted to reflect capital improvements, casualty losses, and/or defunct equipment. I believe that this interpretation is consistent with the Wisconsin Electric Power Company applicability determination dated February 15, 1989, issued by Don Clay, EPA Acting Assistant Administrator for Air and Radiation, and cited in your letter.

If you have any questions on this response, please contact Mr. James Szykman in our Emission Standards Division, Policy Planning and Standards Group, at (919) 541-2452. Should you have future questions pertaining to the NSPS modification provisions and their applicability to a specific facility, our headquarters lead office is the Office of Compliance (OC). The NSPS contact for such issues in OC is Sally Mitoff at (202) 564-7012. This response has been coordinated with the Office of General Counsel, the Office of Compliance, and Region V.

I appreciate this opportunity to be of service and trust this is helpful to you.

Sincerely,  
Original signed by  
Henry Thomas for

John Seltz  
Director  
Office of Air Quality Planning and Standards

cc: Louise Gross, Region V Counsel  
Ed Wojciechowski, Region V



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Ms. Vielhauer:

Thank you for your letter of October 30, 2009, which requested a determination regarding the applicability of New Source Performance Standards (NSPS) to the Bay County Resource Recovery Facility (BCRRF) in Panama City, Florida. According to your letter, Bay County plans to increase the charging capacity of each of the two municipal waste combustor (MWC) units at the plant from 245 ton per day (TPD) to 255 TPD. Based upon our review of information provided with your letter, the U.S. Environmental Protection Agency (EPA) Region 4 cannot conclusively determine which of two potentially applicable NSPS that BCRRF will be subject to following the planned increase in charging capacity. However, below are recommendations on information that you should obtain from Bay County in order to finalize a determination regarding which regulation will apply following the increase in charging rate.

### History

The Florida Department of Environmental Protection (FL DEP) issued the original construction permits for BCRRF on September 24, 1984, and the plant started up on May 1, 1987. Under the terms of subsequent permits issued by the FL DEP on October 14, 1988, the charging capacity limit for each of the two units at BCRRF was increased to 255 TPD. Once the charging capacity of the units exceeded 250 TPD, BCRRF became subject to 40 CFR Part 60, Subpart Cb (Emissions Guidelines and Compliance Times for Large Municipal waste Combustors That Are Constructed on or Before September 20, 1994). This regulation had a compliance date of December 19, 2000.

Because Bay County did not want to incur the expense of installing the control equipment that would be needed in order to comply with Subpart Cb, the County requested approval of a derate that would reduce the charging capacity of the units at BCRRF to 245 TPD. The proposed derate was based upon modifying the forced draft fans at the plant in order to decrease the amount of combustion air available to each MWC unit. This derate was approved in an EPA Region 4 letter dated September 30, 1999, and by reducing the capacity of the units to less than 250 TPD, the County avoided applicability under Subpart Cb.



On December 6, 2000, EPA promulgated 40 CFR Part 60, Subpart BBBB (Emission Guidelines and Compliance Times for Small Municipal Waste Combustors Constructed on or Before August 30, 1999). This regulation had a compliance deadline of December 6, 2005. Based upon the date of construction and the charging capacity at BCRRF, the MWC units at the plant were subject to Subpart BBBB. Under the terms of a permit issued by FL DEP on March 5, 2004, the County installed several pieces of equipment needed in order to comply with the new regulation. This equipment included acid gas scrubbers, fabric filter baghouses, lime storage and slaking equipment, a carbon storage and injection system, induced draft fans, and new exhaust stacks. Equipment installation was completed by June 2005, and compliance was achieved by November 16, 2005. Therefore, Bay County met the December 6, 2005, compliance date in Subpart BBBB.

### **Re-rate Request**

Your October 30 letter included an October 15, 2009, letter from Golder Associates, Incorporated (Golder) in which Golder indicated that Bay County wants to increase the charging capacity of the MWC units at BCRRF back to the previous rate of 255 TPD. According to Golder, the only change that needs to be made in order to return the charging capacity of the units to their previous rate is the replacement of the fan blades that were installed in order to derate the units under the terms of the EPA approval dated September 30, 1999. Since increasing the capacity of the BCRRF will increase the emission rate of several pollutants, the planned re-rate has the potential to trigger the applicability of 40 CFR Part 60, Subpart Eb (Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996). In its letter, Golder maintains that the two units at the BCRRF will be subject to Subpart Cb following the re-rate.

Although most of the emission limits under Subparts Cb and Eb, are similar, the carbon monoxide (CO) limit for BCRRF under Subpart Eb is more stringent than the one under Subpart Cb. Under Subpart Eb, the CO limit for BCRRF would be 100 parts per million (ppm) and under Subpart Cb, the CO limit would be 250 ppm. Because of this difference in CO limits, it is important to determine which of the regulations will apply following the re-rate. Based upon our review of Golder's letter and provisions in the 40 CFR Part 60, Subpart A (General Provisions), the primary issue that must be resolved in order to determine NSPS applicability to BCRRF is whether or not replacing the fan blades at the plant will constitute a capital expenditure.

Under 40 CFR 60.14, a physical change or change in the operation of an existing facility that results in an emission rate increase of a regulated pollutant constitutes a modification that can trigger NSPS applicability. However, 40 CFR 60.14(e) lists a number of changes that does not trigger NSPS applicability even if they cause an increase in emissions. Among these exemptions is one in 40 CFR 60.14(e)(2) which lists emission rate increases resulting from production rate increases that are accomplished without a capital expenditure. The term capital expenditure is defined in 40 CFR 60.2 as "... an expenditure for a physical or operation change which exceeds the product of the applicable "annual asset guideline repair allowance percentage" specified in the latest Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined in section 1012 of the Internal Revenue Code. However, the total expenditure

for a physical or operational change to an existing facility must not be reduced by any "excluded additions" as defined in IRS Publication 534, as would be done for tax purposes." According to the enclosed EPA determination issued on April 7, 1998, the "basis" used for determining the applicability of the exemption in 40 CFR 60.14(e)(2) is the cost of the property, adjusted to reflect capital improvements, casualty losses, and defunct equipment. Additionally, the determination indicates that the existing facility's basis should not be adjusted to account for depreciation.

Since the applicability date for modified facilities under Subpart Eb is June 19, 1996, BCRRF would be an existing facility with respect to this rule. Therefore, the emission rate increase resulting from the planned re-rate would trigger the applicability of Subpart Eb unless one of the exemptions in 40 CFR 60.14(e) applies. Although Golder's letter discusses the exemption in 40 CFR 60.14(e)(2), it does not contain enough information for us to determine whether the cost of replacing the fan blades would constitute a capital expenditure. According to Golder, the estimated cost of replacing the fan blades that were installed in order to derate the MWC units is \$45,640. However, the letter does not provide any information regarding the "basis" for the MWC units at BCRRF and without this information, we cannot determine whether the exemption in 40 CFR 60.14(e)(2) applies.

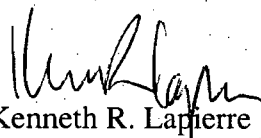
The latest edition of IRS Publication 534 was published in December 1984 and the annual asset guideline repair allowance listed for waste reduction and resource recovery plants in this document is 15 percent. Based upon this figure, the cost of the changes required to re-rate BCRRF would constitute a capital expenditure if the basis for the facility is less than \$284,260. If the costs of the changes constitute a capital expenditure, the exemption in 40 CFR 60.14(e)(2) would not apply and the re-rate would trigger applicability under Subpart Eb. Since the re-rate will increase the charging capacity of the units at BCRRF to more than 250 TPD, the units will become subject to Subpart Cb if the exemption in 40 CFR 60.14(e)(2) does apply.

### **Recommendation**

Since it is necessary to know the basis for BCRRF in order to determine regulatory applicability, we recommend that you ask Bay County to provide information regarding the facility's basis. When calculating the basis, the County should follow the guidance in the EPA determination issued on April 7, 1998. If the basis for the facility exceeds \$284,260, the exemption in 40 CFR 60.14(e)(2) will apply, and the re-rated facility will be subject to Subpart Cb. If the basis for the facility is less than \$264,260, the re-rated facility will be subject to Subpart Eb. Because the basis that would trigger the exemption in 40 CFR 60.14(e)(2) is relatively low, the most likely outcome is that Subpart Cb will apply following the re-rate. However, it would be better to obtain the information needed in order to make a determination than it would be to simply assume that Subpart Cb will apply following the re-rate.

If you have any questions about the determination provided in this letter, please contact David McNeal of the EPA Region 4 staff at (404) 562-9102.

Sincerely,



Kenneth R. Lapierre  
Acting Director  
Air, Pesticides and Toxics  
Management Division

Enclosure

cc: Dennis Mitchell, FL DEP

David Buff,  
Golder Associates, Inc.

existing facility." 39 Fed. Reg. at 36948.

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Sincerely,  
Original signed by  
Henry Thomas for

John Seitz  
Director  
Office of Air Quality Planning and Standards

cc: Louise Gross, Region V Counsel  
Ed Wojciechowski, Region V

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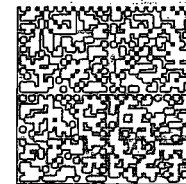
Sincerely,  
Original signed by  
Henry Thomas for

John Seltz  
Director  
Office of Air Quality Planning and Standards

cc: Louise Gross, Region V Counsel  
Ed Wojciechowski, Region V

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, S.W.  
ATLANTA, GEORGIA 30303-8960

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12/22/2009

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*Trina*

~~Dennis Mitchell, FLDEP  
Bureau of Air Regulation, Div of Air  
Resource Management  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400~~

32399+2400





January 20, 2010

Ms. Trina Vielhauer  
Florida Department of Environmental Protection  
Department of Air Resources Management  
2600 Blair Stone Road  
MS #5505  
Tallahassee, FL 32399-2400

**RECEIVED**

093-87678

JAN 22 2010

**BUREAU OF AIR REGULATION**

**RE: BAY COUNTY UTILITIES SERVICE DEPARTMENT  
BAY RESOURCE MANAGEMENT CENTER  
FACILITY ID NO. 0050031  
BAY COUNTY RE-RATE PROJECT**

Dear Ms. Vielhauer:

The U.S. Environmental Protection Agency (EPA) recently responded to the Florida Department of Environmental Protection's (FDEPs) letter dated October 30, 2009, regarding Bay County's proposal to re-rate the Bay County Resource Recovery Facility (BCRRF). Bay County operates the facility, which includes two identical Municipal Waste Combustor (MWC) emission units with mass burn rotary waterwall technology.

Bay County is proposing to re-rate the MWC units at the facility from a charging rate of 245 tons per day (TPD) of municipal solid waste (MSW) [at 4,500 British thermal units per pound (Btu/lb)] to their original charging capacity of 255 TPD MSW per unit. This will correspond to a steam production limit of 68,000 pounds per hour (lb/hr) (24-hour average). Bay County, through a letter dated October 15, 2009, from Golder Associates Inc. (Golder), requested an applicability determination for the New Source Performance Standards (NSPS) contained in Title 40 of the Code of Federal Regulations, Part 60 (40 CFR 60), Subparts Cb and Eb, which apply to MWC combustion units greater than 250 TPD MSW charging capacity.

EPA's letter recommends that Bay County provide further information regarding the facility's basis. When calculating the basis, Bay County should follow the guidance in the EPA determination issued on April 7, 1998 (which was attached to the EPA letter). EPA states that if the basis for the facility is less than \$264,260, the re-rated facility will be subject to Subpart Eb. If the facility's basis is greater than this amount, the re-rated facility will be subject to Subpart Cb.

## **EPA GUIDANCE**

Capital expenditure is defined in 40 CFR 60.2 as follows:

*"Capital expenditure means an expenditure for a physical or operational change to an existing facility which exceeds the product of the applicable "annual asset guideline repair allowance percentage" specified in the latest edition of Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined by section 1012 of the Internal Revenue Code. However, the total expenditure for a physical or operational change to an existing facility must not be reduced by any "excluded additions" as defined in IRS Publication 534, as would be done for tax purposes."*

The EPA guidance attempts to clarify this definition further as follows:

*"Section 1012 of the Internal Revenue Code defines the basis of the property as the "...cost of such property except as otherwise provided in this subchapter and [other specified subchapters]...". Other subsections in the same subchapter describe how to adjust the original*



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6026 NW 1st Place  
Gainesville, FL 32607 USA  
Tel: (352) 336-5600 Fax: (352) 336-6603 www.golder.com



Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America

*cost basis when determining the gain or loss from the sale of property; however, they do not address what, if any, adjustments should be made in a regulatory context such as this. EPA's reading of this section for the purpose of the NSPS program is that the "basis" is the cost of the property, as adjusted to reflect capital improvements, casualty losses, and defunct equipment. This reading is consistent with the original intent of the exemption, as these adjustments are related to operating capacity. In contrast, taking into account depreciation would be inconsistent with the original intent of the exemption, as depreciated equipment may remain fully functional.*

*In conclusion, when calculating an existing facility's basis for the purpose of a "capital expenditure" evaluation, depreciation should not be considered. However, an existing facility's basis should be adjusted to reflect capital improvements, casualty losses, and/or defunct equipment."*

To properly make this determination for the BCRRF, the boundaries of the "affected facility" must first be determined. Subpart Cb refers to Subpart Eb in this regard. Subpart Eb defines the boundaries of the MWC unit as follows:

*"(2) The boundaries of a municipal solid waste combustor are defined as follows. The municipal waste combustor unit includes, but is not limited to, the municipal solid waste fuel feed system, grate system, flue gas system, bottom ash system, and the combustor water system. The municipal waste combustor boundary starts at the municipal solid waste pit or hopper and extends through:*

- (i) The combustor flue gas system, which ends immediately following the heat recovery equipment or, if there is no heat recovery equipment, immediately following the combustion chamber,*
- (ii) The combustor bottom ash system, which ends at the truck loading station or similar ash handling equipment that transfer the ash to final disposal, including all ash handling systems that are connected to the bottom ash handling system; and*
- (iii) The combustor water system, which starts at the feed water pump and ends at the piping exiting the steam drum or superheater.*

*(3) The municipal waste combustor unit does not include air pollution control equipment, the stack, water treatment equipment, or the turbine-generator set."*

Using the above boundaries for each of the MWC units, the following was determined:

1. The original cost of each unit (for any shared systems, take one half of the total cost). The cost of the property is the amount paid for it in cash or other property. Cost also includes amount paid for state sales tax, freight, installation, and testing (IRS Code Section 1012).
2. Add any capital improvements since the original units were constructed.
3. Deduct any casualty losses. If there have been any casualty losses, decrease the basis in the property by any insurance or other reimbursement, and by any deductible loss not covered by insurance.

Depreciation was not considered in making these calculations.

## **The Original Cost of Each Unit**

Bay County has on-file a detailed listing and accounting of the cost of the original facility (see Attachment 1 – Asset Detail Report dated February 4, 1986). From these data, costs of only the "affected facility" were extracted. This includes the boiler fuel feed system (but not the MSW tipping floor/building), boilers, and ash handling system, including the buildings housing these components, since the buildings were necessary to the operation of the affected facilities. These costs have been itemized and summed in attached spreadsheet (Attachment 2). According to Bay County's calculations, the original cost of the "affected facility" was \$23,859,624. Please note that this cost does not include the cost of the land or the cost of installing infrastructure necessary for the facility. Therefore, the original cost per unit is \$11,930,000.



## Add Any Capital Improvements

There have been no capital improvements to the "affected facility" since the original construction. Upgrades to the air pollution control equipment have been made, but these are outside the boundaries of the affected facility.

## Deduct Any Casualty Losses

There have been no casualty losses to the affected facility since the original construction.

Based on these data, the existing facility's basis is determined to be approximately \$12,000,000.

## REQUEST TO RE-RATE FACILITY

As stated in the previous correspondence, the only physical change that may be necessary to the units to accomplish the re-rating would be the replacement of the fan blades, which were changed when the facility was de-rated in 1999. However, future operation of the unit at the higher rates may indicate new fan blades are necessary, or are desirable from an energy efficiency standpoint. The new fan blades may be required to provide enough combustion air to the units. Also, changing the fan blades would increase the capacity of the fans to deliver combustion air to the boilers, which could allow the fans to operate at slower speeds, and increase the energy efficiency of the fans.

The cost of replacement fan blades for both units, if required, is estimated at \$45,640. This represents less than 0.2 percent of the existing facility's basis, which is much less than the criteria that define a capital expenditure (i.e., 15 percent or more of the existing facility's basis). Therefore, the proposed re-rate project does not constitute a modification for purposes of the NSPS. As a result, Subpart Cb would apply to the facility after the re-rate is implemented.

We request concurrence from FDEP that the facility re-rate project will trigger the requirements of 40 CFR 60 Subpart Cb, and will not trigger 40 CFR 60 Subpart Eb requirements. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

**GOLDER ASSOCIATES INC.**

*David A. Buff*  
David A. Buff, PE, QEP  
Principal Engineer

cc: Paul Lackemacher, Assistant Director, Bay County Public Utilities  
Glenn Ogborn, Solid Waste Superintendent, Responsible Official  
Kenneth Lapierre, Acting Director, Air, Pesticides and Toxics Management Division

Attachments

DB/tlc

**ATTACHMENT 1**

ASSET DETAIL REPORT

Exhibit M

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VALTEC ASSOCIATES  
COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/SAY CNTY FL

PAGE: 1  
DATE: 07/04/86

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE		NON-SEC 3P	SEC 3P
				UNIT COST	SOURCE		
0001	CSA SITE-CLEARING AND GRADING	1.0	TOT	317202.8236	PMTRQ	317,202.82	
0007	CSA SITE-CONCRETE SIDEWALKS	1.0	TOT	676.1327	PMTRQ	676.13	
0008	CSA SITE-FENCING AND GATES	1.0	TOT	51376.4257	PMTRQ	51,376.43	
A1100 ..... CSA-SITE IMPROVEMENTS						\$369,255.38	
0002	CSA SITE-STORM SYSTEM	1.0	TOT	65845.6653	PMTRQ	65,845.67	
0009	CSA SITE-HEADWALLS/STORM	1.0	TOT	17193.0885	PMTRQ	17,193.09	
A1110 ..... CSA-SITE UTILITIES						\$83,038.76	
0003	CSA SITE-ASPHALT ROADWAY	1,050.0	SY	27.0453	PMTRQ	28,397.57	
0004	CSA SITE-ASPHALT PARKING	5,000.0	SY	19.3181	PMTRQ	96,590.38	
0005	CSA SITE-PARKING STRIPING	1.0	TOT	608.5194	PMTRQ	608.52	
A1130 ..... CSA-ASPHALT PAVING						\$125,596.47	
0010	CSA RFSE BLDG-HAND EXCAV	1.0	TOT	7308.0265	PMTRQ	7,308.03	
0011	CSA RFSE BLDG-MACH EXCAV	1.0	TOT	16466.7288	PMTRQ	16,466.73	
0012	CSA RFSE BLDG-HAND BACKFILL	1.0	TOT	4219.0680	PMTRQ	4,219.07	
0013	CSA RFSE BLDG-MACH BACKFILL	1.0	TOT	24418.0493	PMTRQ	24,418.05	
0014	CSA RFSE BLDG-FINEGRADE	1.0	TOT	11279.8251	PMTRQ	11,279.83	
0015	CSA RFSE BLDG-STONE FILL	1.0	TOT	62884.2041	PMTRQ	62,884.20	
0016	CSA RFSE BLDG-SHEETING	1.0	TOT	55462.1989	PMTRQ	55,462.20	
0017	CSA RFSE BLDG-VAPOR BARRIER	1.0	TOT	8020.8656	PMTRQ	8,020.87	
0018	CSA RFSE BLDG-MUD SLAB	1.0	TOT	4220.9998	PMTRQ	4,221.00	
0019	CSA RFSE BLDG-CONC FTNGS	1.0	TOT	166525.6670	PMTRQ	166,525.69	
0025	CSA RFSE BLDG-MISC CONC WORK	1.0	TOT	490972.3354	PMTRQ	490,872.34	
0026	CSA RFSE BLDG-FTNG FORMS	1.0	TOT	80880.9246	PMTRQ	80,880.92	
0030	CSA RFSE BLDG-SUSP SLAB EDGE	1.0	TOT	254.9986	PMTRQ	255.00	
0031	CSA RFSE BLDG-PRICIA BOARD	1.0	TOT	7138.0294	PMTRQ	7,138.03	
0032	CSA RFSE BLDG-FINISH & CURE	1.0	TOT	44989.8694	PMTRQ	44,989.87	
0033	CSA RFSE BLDG-CONTROL JOINTS	1.0	TOT	2096.0113	PMTRQ	2,096.01	
0034	CSA RFSE BLDG-WATERPROOF	1.0	TOT	20602.7291	PMTRQ	20,602.73	
0035	CSA RFSE BLDG-CONC TOPPING	1.0	TOT	23948.6200	PMTRQ	23,948.62	
0051	CSA CNVYR BLDG-MACH EXCAV	1.0	TOT	1601.4638	PMTRQ	1,601.47	
0052	CSA CNVYR BLDG-HAND EXCAV	1.0	TOT	718.6325	PMTRQ	718.63	
0053	CSA CNVYR BLDG-MACH BACKFILL	1.0	TOT	2376.1235	PMTRQ	2,376.12	
0054	CSA CNVYR BLDG-HAND BACKFILL	1.0	TOT	415.3387	PMTRQ	415.34	
0055	CSA CNVYR BLDG-FINE GRADE	1.0	TOT	668.4055	PMTRQ	668.41	
0056	CSA CNVYR BLDG-STONE FILL	1.0	TOT	3724.5252	PMTRQ	3,724.53	
0057	CSA CNVYR BLDG-VAPOR BARRIER	1.0	TOT	475.2247	PMTRQ	475.22	

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BEST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CNTY FL

PAGE: 7  
DATE: 07/04/86

ASSET	TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NOV-SEC 3E	SEC 3E
0058	CSA	ENVYR BLDG-PILE&PILE CAPS	1.0	TD2	28045.9841	PMTRQ	28,045.98	
0059	CSA	ENVYR BLDG-GRADE BEAM	1.0	TD2	1319.4247	PMTRQ	1,319.42	
0060	CSA	ENVYR BLDG-SLAB ON GRADE	1.0	TD2	10887.6682	PMTRQ	10,887.67	
0062	CSA	ENVYR BLDG-FORMWORK	1.0	TD2	8604.2715	PMTRQ	8,604.27	
0063	CSA	ENVYR BLDG-CONC RECAP	1.0	TD2	4076.1142	PMTRQ	4,076.11	
0075	CSA	RFSE BLDG-REINFORCING	1.0	TD2	359434.0716	PMTRQ	359,434.07	
0076	CSA	ELR-BLR HSE/MACH EXCAV	1.0	TD2	10140.0586	PMTRQ	10,140.06	
0077	CSA	ELR-BLR HSE/HAND EXCAV	1.0	TD2	4493.3847	PMTRQ	4,493.38	
0078	CSA	ELR-BLR HSE/MACH BACKFILL	1.0	TD2	15035.2593	PMTRQ	15,035.26	
0079	CSA	ELR-BLR HSE/HAND BACKFILL	1.0	TD2	2592.4859	PMTRQ	2,592.49	
0080	CSA	ELR-BLR HSE/FINE GRADE	1.0	TD2	2184.8745	PMTRQ	2,184.87	
0081	CSA	ELR-BLR HSE/STONE FILL	1.0	TD2	15189.8039	PMTRQ	15,189.80	
0082	CSA	ELR-BLR HSE/VAPOR BARRIER	1.0	TD2	1553.1734	PMTRQ	1,553.17	
0083	CSA	ELR-BLR HSE/PILE&PILE CAP	1.0	TD2	156263.9245	PMTRQ	156,263.92	
0084	CSA	ELR-BLR HSE/GRADE RECAP	1.0	TD2	5940.3087	PMTRQ	5,940.31	
0085	CSA	ELR-BLR HSE/SLAB ON GRADE	1.0	TD2	31287.5574	PMTRQ	31,287.56	
0090	CSA	ELR-BLR HSE/FORMS-PILES	1.0	TD2	16343.0931	PMTRQ	16,343.09	
0091	CSA	ELR-BLR HSE/FORMS-SLABS	1.0	TD2	477.1565	PMTRQ	477.16	
0092	CSA	ELR-BLR HSE/FORMS-CRD BEAM	1.0	TD2	21966.5853	PMTRQ	21,966.59	
0093	CSA	ELR-BLR HSE/FORMS-SWG	1.0	TD2	3873.2744	PMTRQ	3,873.27	
0094	CSA	ELR-BLR HSE/FORMS-MISC	1.0	TD2	23747.7120	PMTRQ	23,747.71	
0095	CSA	ELR-BLR HSE/CONC FINISH	1.0	TD2	15755.8236	PMTRQ	15,755.82	
0096	CSA	ELR-BLR HSE/CONC RECAP	1.0	TD2	50605.6344	PMTRQ	50,605.63	
0142	CSA	ELR-WSTE TRTMT/FNDTMS	1.0	TD2	48109.7386	PMTRQ	48,109.74	
0144	CSA	ELR-WSTE BLDG/EARTHWORK	1.0	TD2	3245.4369	PMTRQ	3,245.44	
0145	CSA	ELR-WSTE BLDG/SWG	1.0	TD2	1466.2420	PMTRQ	1,466.24	
0146	CSA	ELR-WSTE BLDG/FORMWORK	1.0	TD2	919.5405	PMTRQ	919.54	
0147	CSA	ELR-WSTE BLDG/FINISH	1.0	TD2	415.3387	PMTRQ	415.34	
0148	CSA	ELR-WSTE BLDG/REINFORCING	1.0	TD2	1427.6059	PMTRQ	1,427.61	
0158	CSA	OFFICE & MTCE BLDG/EARTHWR	1.0	TD2	25289.2945	PMTRQ	25,289.29	
0159	CSA	OFFICE & MTCE BLDG/CONCRET	1.0	TD2	35775.1467	PMTRQ	35,775.15	
0160	CSA	OFFICE & MTCE BLDG/FORMWRK	1.0	TD2	15303.7806	PMTRQ	15,303.78	
0161	CSA	OFFICE & MTCE BLDG/CONC FI	1.0	TD2	4808.2694	PMTRQ	4,808.27	

12100 ..... CSA-SUBSTRUCTURE

51,968,146.92

0037	CSA	RFSE BLDG-STRUCTURAL	1.0	TD2	95290.2782	PMTRQ	95,290.28	
0038	CSA	RFSE BLDG-STAIRS	1.0	TD2	8071.0926	PMTRQ	8,071.09	
0039	CSA	RFSE BLDG-GRATING	1.0	TD2	11695.1638	PMTRQ	11,695.16	
0040	CSA	RFSE BLDG-HANDRAIL	1.0	TD2	17301.2697	PMTRQ	17,301.27	
0041	CSA	RFSE BLDG-METAL DECKING	1.0	TD2	438.5203	PMTRQ	438.52	
0065	CSA	ENVYR BLDG-STRUCTURAL	1.0	TD2	61659.4380	PMTRQ	61,659.44	
0066	CSA	ENVYR BLDG-GRATING	1.0	TD2	17542.7457	PMTRQ	17,542.75	
0067	CSA	ENVYR BLDG-HANDRAIL	1.0	TD2	19462.9625	PMTRQ	19,462.96	
0098	CSA	ELR-BLR HSE/STRUCTURAL	1.0	TD2	154146.6632	PMTRQ	154,146.66	
0100	CSA	ELR-BLR HSE/METAL DECK	1.0	TD2	5401.3343	PMTRQ	5,401.33	

*IF IT SERVES  
AS AN OVER CONTROL  
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ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CNTY FL

PAGE: 3  
DATE: 07/04/84

ASSET TY-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 3B	SEC 3F
0101	CSA ELR-BLR HSE/GRATING	1.0	TD2	263141.1852	PMTRQ	263,141.19	
0102	CSA ELR-BLR HSE/HANDRAIL	1.0	TD2	34600.6076	PMTRQ	34,600.61	
0103	CSA ELR-BLR HSE/STAIRS	1.0	TD2	57840.2542	PMTRQ	57,840.25	
0104	CSA ELR-BLR HSE/LANDINGS	1.0	TD2	17276.1562	PMTRQ	17,276.16	
0151	CSA ELR-WSTE BLDG/BAR JOISTS	1.0	TD2	1522.2645	PMTRQ	1,522.26	
0152	CSA ELR-WSTE BLDG/DECK	1.0	TD2	1095.3350	PMTRQ	1,095.33	
0153	CSA ELR-WSTE BLDG/WSTRE PROT	1.0	TD2	5059.4044	PMTRQ	5,059.40	
12200	..... CSA-FRAMPING SYSTEM					\$771,544.66	
0021	CSA RFSE BLDG-9"SLAB ON GFACE	1.0	TD2	145899.7762	PMTRQ	145,899.78	
0086	CSA ELR-BLR HSE/ELEVTD SLAB	1.0	TD2	3682.0255	PMTRQ	3,682.02	
12300	..... CSA-FLOOR STRUCTURE					\$149,581.81	
✓0024	CSA RFSE BLDG-PRCST CONC WALL	1.0	TD2	212931.5714	PMTRQ	212,931.57	
12400	..... CSA-EXTERIOR WALLS					\$212,931.57	
✓0042	CSA RFSE BLDG-INT INSLTD GLASS	1.0	TD2	2897.7115	PMTRQ	2,897.71	
✓0044	CSA RFSE BLDG-WIRE GLASS/FRAME	1.0	TD2	3083.1851	PMTRQ	3,083.17	
✓0045	CSA RFSE BLDG-HM DR AND FRAME	1.0	TD2	4014.2964	PMTRQ	4,014.30	
0069	CSA CNVYR BLDG-DOORS AND FRAME	1.0	TD2	2408.9642	PMTRQ	2,408.96	
0097	CSA ELR-BLR HSE/PREFAB BLDG	1.0	TD2	711268.4117	PMTRQ	711,268.41	
0102	CSA ELR-BLR HSE/HM CRSEFRAMES	1.0	TD2	18500.9223	PMTRQ	18,500.92	
0154	CSA ELR-WSTE BLDG/DFSEWINDOWS	1.0	TD2	2822.3710	PMTRQ	2,822.37	
0163	CSA OFFICE & MICE BLDG/MTL BLD	1.0	TD2	90794.9617	PMTRQ	90,794.96	
0164	CSA OFFICE & MICE BLDG/HM DOOR	1.0	FA2	3477.2539	PMTRQ	3,477.25	
0165	CSA OFFICE & MICE BLDG/HM DRS	1.0	TD2	22606.0137	PMTRQ	22,606.01	
12500	..... CSA-DOORS AND WINDOWS					\$61,674.00	
✓0036	CSA RFSE BLDG-METAL BLDG	1.0	TD2	1150913.0707	PMTRQ	1,150,913.07	
0064	CSA CNVYR BLDG-PREFAB BLDG	1.0	TD2	267634.5699	PMTRQ	267,634.57	
12600	..... CSA-PREFABRICATED BUILDINGS					\$1,418,547.64	
0043	CSA RFSE BLDG-OFF MTL PANFL	1.0	TD2	2897.7115	PMTRQ	2,897.71	

*N/A allowed SKETCHES*

*N/A*

*Yes if order control function*

*Further explanation for purpose of order control*  
*Structure*

*✓ If an order control structure.*

*N/A IF OFFICE*  
*Basins Function Control 2. Filter 200PS dust dry.*

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 COST REPORT 4

ASSET DETAIL REPORT  
 WESTINGHOUSE-WASTE TO ENERGY/BAY CITY FL

PAGE: 4  
 DATE: 07/04/56

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 3E	ECC 3E
0106	CSA BLR-BLR HSE/MASONRY	1.0	TD	179868.6227	PMTRQ	179,868.62	
0107	CSA BLR-BLR HSE/CARPENTRY	1.0	TD	9176.0866	PMTRQ	9,176.09	
0149	CSA BLR-WSTE BLDG/MASONRY	1.0	TD	21636.2462	PMTRQ	21,636.25	
0150	CSA BLR-BLDG/CARPENTRY	1.0	TD	782.3821	PMTRQ	782.38	
0175	CSA OFFICE & MTCE BLDG/DRYHALL	1.0	TD	62946.0215	PMTRQ	62,946.02	
0176	CSA-MISC RVSN	1.0	TD	18993.5333	PMTRQ	18,993.53	
12700	..... CSA-INTERIOR ENCLOSURES					9296,300.66	N/A
0047	CSA FFSE BLDG-PAINT/STPCTL	1.0	TD	5358.8345	PMTRQ	5,358.83	
0048	CSA FFSE BLDG-PAINT/STAIRSCHR	1.0	TD	3803.7294	PMTRQ	3,803.73	
0049	CSA FFSE BLDG-PAINT/GRATING	1.0	TD	1216.9707	PMTRQ	1,216.97	
0050	CSA FFSE BLDG-PAINT/DRSEDFCK	1.0	TD	10277.2169	PMTRQ	10,277.22	
0071	CSA CNVYR ELDE-PPINT STPCTRL	1.0	TD	3467.5948	PMTRQ	3,467.59	
0072	CSA CNVYR ELDE-PAINT GRATING	1.0	TD	1823.6265	PMTRQ	1,823.63	
0073	CSA CNVYR BLDG-PAINT HANDFAIL	1.0	TD	3494.6401	PMTRQ	3,494.64	
0074	CSA CNVYR BLDG-PAINT DRFRAMES	1.0	TD	1750.2178	PMTRQ	1,750.22	
0113	CSA BLR-BLR HSE/PAINTING	1.0	TD	104377.5016	PMTRQ	104,377.50	
0155	CSA BLR-WSTE BLDG/PAINTING	1.0	TD	4280.8859	PMTRQ	4,280.89	
0166	CSA OFFICE & MTCE BLDG/PAINTIN	1.0	TD	7595.8675	PMTRQ	7,595.87	
0173	CSA OFFICE & MTCE BLDG/TILE	1.0	TD	4555.0662	PMTRQ	4,555.07	
12800	..... CSA-INTERIOR FINISHES					9152,002.16	N/A
0174	CSA OFFICE & MTCE BLDG/SHOWERS	1.0	TD	2667.8264	PMTRQ	2,667.83	
13200	..... CSA-PLUMBING SYSTEM					92,667.83	N/A
0006	CSA SITE-TRUCK SCALE PIT	1.0	EAR	48295.1024	PMTRQ		48,295.19
15101	..... CSA-TRUCK SCALE PIT						548,295.19
0020	CSA FFSE BLDG-16"APPRCH APRON	1.0	TD	79171.2748	PMTRQ		79,171.27
0027	CSA FFSE BLDG-APRON FORMS	1.0	TD	5820.5366	PMTRQ		5,820.54
15102	..... CSA-CONCRETE TRUCK APRONS						94,991.81
0068	CSA CNVYR ELDE-METAL CANOPY	1.0	TD	11977.2077	PMTRQ		11,977.21

*Admin. Audit*  
 N/A  
 48,295.19  
 548,295.19

N/A  
 94,991.81

N/A  
 11,977.21

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COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CITY FL

PAGE: 5  
DATE: 02/04/86

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 3A	SEC 3B
15103 .....	CSA-METAL CANGPIES						\$11,577.21
0022	CSA RFSE BLDG-PIT SLABWALLS	1.0	TD2	71461.4303	PMTRQ		71,461.43
0023	CSA RFSE BLDG-CURB AT PIT	1.0	TD2	1048.9716	PMTRQ		1,048.97
0028	CSA RFSE BLDG-PIT SLAB FORMS	1.0	TD2	66529.5252	PMTRQ		66,529.53
0029	CSA RFSE BLDG-PIT CURB FORMS	1.0	TD2	4290.5449	PMTRQ		4,290.54
15104 .....	CSA-REFUSE BLDG/EQUIPMENT PITS					OK.	\$143,330.47
0061	CSA CNVYR BLDG-EQUIPMENT GROUT	1.0	TD2	424.9977	PMTRQ		425.00
15105 .....	CSA-CONVEYOR BLDG/EQUIPMENT SETTING						\$425.00
0087	CSA BLR-BLR HSE/TURFINE FTNGS	1.0	TD2	598.8604	PMTRQ		598.86
0088	CSA BLR-BLR HSE/MISC EQUP CONC	1.0	TD2	7719.5036	PMTRQ		7,719.50
0089	CSA FLR-BLR HSE/FDRYS-EQUP FTG	1.0	TD2	10004.8321	PMTRQ		10,004.83
0115	CSA BLR-EVAP CONDNSR/HAND EXCAV	1.0	TD2	3809.5248	PMTRQ		3,809.52
0116	CSA BLR-EVAP CONDNSR/MACH EXCAV	1.0	TD2	1047.0398	PMTRQ		1,047.04
0117	CSA BLR-EVAP CONDNSR/BACKFILL	1.0	TD2	6504.3565	PMTRQ		6,504.36
0118	CSA BLR-EVAP CONDNSR/CONC	1.0	TD2	27049.1714	PMTRQ		27,049.17
0119	CSA BLR-EVAP CONDNSR/FORMS	1.0	TD2	30912.7867	PMTRQ		30,912.79
0120	CSA FLR-EVAP CONDNSR/REBAR	1.0	TD2	12975.9523	PMTRQ		12,975.95
0121	CSA BLR-EVAP CONDNSP/EMBEDS	1.0	TD2	5787.6959	PMTRQ		5,787.70
0125	CSA FLR-STACK FDN/CONC PAD	1.0	TD2	5412.9252	PMTRQ		5,412.93
0126	CSA BLR-STACK FDN/MACH EXCAV	1.0	TD2	332.2709	PMTRQ		332.27
0127	CSA BLR-STACK FDN/HAND EXCAV	1.0	TD2	88.8632	PMTRQ		88.86
0128	CSA BLR-STACK FDN/BACKFILL	1.0	TD2	560.2742	PMTRQ		560.22
0129	CSA BLR-STACK FDN/FORMWORK	1.0	TD2	3475.3220	PMTRQ		3,475.32
0130	CSA BLR-STACK FDN/REBAR	1.0	TD2	2615.6676	PMTRQ		2,615.67
0131	CSA BLR-STACK FDN/EMBEDS	1.0	TD2	1155.2210	PMTRQ		1,155.22
0132	CSA BLR-STACK FDN/GUY ANCHORS	1.0	TD2	7721.4354	PMTRQ		7,721.44
0133	CSA FLR-PRECIP FDN/8" CONC MAT	1.0	TD2	23952.4836	PMTRQ		23,952.48
0134	CSA BLR-PRECIP FDN/FDRYS	1.0	TD2	2889.9843	PMTRQ		2,889.98
0135	CSA BLR-PRECIP FDN/REBAR	1.0	TD2	10729.2599	PMTRQ		10,729.26
0136	CSA FLR-PRECIP FDN/FNDTNS	1.0	TD2	8519.2719	PMTRQ		8,519.27
0143	CSA BLR-WSTE TRTMT/Equip FDN	1.0	TD2	28971.3200	PMTRQ		28,971.32
0156	CSA BLR-FUEL DIL STRGE/FNDTNS	1.0	TD2	21636.2462	PMTRQ		21,636.25

15106 .....

\$274,470.25

OK  
ADJUST  
OK



JALTEC ASSOCIATES  
COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CNTY FL

PAGE: 6  
DATE: 02/06/86

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 38	SEC 38
0105	CSA BLR-BLP HSE/PHL-DUST PROT.	1.0	TQ2	61808.1872	PMTRQ		61,808.19
15107 .....	CSA-BOILER BLDG/DUST PROTECTION PANELS						161,808.19
0122	CSA BLR-EVAP CONDNR/GALV HR	1.0	TQ2	11876.7537	PMTRQ		11,876.75
15108 .....	CSA-BOILER BLDG/EQUIPMENT HANDRAIL						11,876.75
0123	CSA BLR-EVAP CONDNR/GALV LDDP	1.0	TQ2	1035.4489	PMTRQ		1,035.45
15109 .....	CSA-BOILER BLDG/EQUIPMENT LADDEFS						11,035.45
0138	CSA BLR-PRECIP FDN/PLTFRM-GRTG	1.0	TQ2	23954.4154	PMTRQ		23,954.42
15111 .....	CSA-BOILER BLDG/EQUIP PLATFORM GRATING						23,954.42
0139	CSA BLR-PRECIP FDN/PLTFRM-HR	1.0	TQ2	9363.4719	PMTRQ		9,363.47
15112 .....	CSA-BOILER BLDG/EQUIP PLATFORM HANDRAIL						9,363.47
0140	CSA BLR-PRECIP FDN/PLTFRM-STRS	1.0	TQ2	15545.2565	PMTRQ		15,545.26
15113 .....	CSA-BOILER BLDG/EQUIP PLATFORM STAIRS						15,545.26
0141	CSA BLR-PRECIP FDN/PLTFRM-STL	1.0	TQ2	16115.1398	PMTRQ		16,115.14
15114 .....	CSA-BOILER BLDG/EQUIP PLATFORM STEEL						16,115.14
0157	CSA BLR-FUEL OIL STRGE/DIKE	1.0	TQ2	2889.9843	PMTRQ		2,889.98
15115 .....	CSA-BOILER BLDG/FUEL OIL STRGE DIKE						2,889.98

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PAGE N/A*

ASSET TX-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 30	SEC 30
	2000- CSA SITE-ASPHALT ROADWAY/TRUCK	5,950.0	SY2	27.0453	PMTRQ		160,919.52
A5202	..... CONCPETE TRUCK PAVEMENT/ROADWAYS					N/A	\$160,919.52
	2001 CSA CNVYR BLDG-PILESEPILE CAP	1.0	TD2	4949.2913	PMTRQ		4,949.29
A5203	..... CONVEYOR BLDG EQUIPMENT FOUNDATIONS					09L	\$4,949.29
	0114 CSA BLR-EVAP CONDNSP/PILES	1.0	TD2	20283.9808	PMTRQ		20,283.98
	0124 CSA BLR-STACK FDN/PILES	1.0	TD2	28397.5731	PMTRQ		28,397.57
	0137 CSA BLR-PRECIP FDN/CONC PIERS	1.0	TD2	3301.4594	PMTRQ		3,301.46
	2002 CSA BLR BLDG-PILESEPILE CAPS	1.0	TD2	104176.5936	PMTRQ		104,176.59
A5204	..... BOILFR BLDG EQUIPMENT FOUNDATIONS					OK	\$104,176.59
	0112 CSA BLR-BLR HSE/ACOUSTICAL	2,168.0	SF2	1.6420	PMTRQ		3,559.94
	0171 CSA OFFICE E MTCE BLDG/ACSTEL	3,710.0	SF2	1.6420	PMTRQ		6,091.96
A5301	..... CSA-ACOUSTICAL CEILINGS					N/A	\$9,651.90
	0169 CSA OFFICE E MTCE BLDG/CAPPET	151.0	SY2	26.9771	PMTRQ		4,075.54
A5303	..... CSA-CARPETING					N/A	\$4,075.54
	0110 CSA BLR-BLR HSE/VINYL FLRNG	2,168.0	SF2	1.9318	PMTRQ		4,199.16
	0111 CSA BLR-BLR HSE/VINYL BASE	280.0	LF2	1.3523	PMTRQ		378.63
	0168 CSA OFFICE E MTCE BLDG/VAT	2,174.0	SF2	1.9318	PMTRQ		4,199.75
	0170 CSA OFFICE E MTCE BLDG/V PASE	725.0	LF2	1.3523	PMTRQ		980.39
A5304	..... CSA-REMOVABLE FLOOR COVERINGS					N/A	\$9,746.93
	0172 CSA OFFICE E MTCE BLDG/TLT PRT	1.0	TD2	9724.7199	PMTRQ		9,724.72
A5307	..... CSA-TOILET PARTITIONS					N/A	\$9,724.72

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COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/RAY CNTY FL

PAGE: F  
DATE: 07/04/88

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 38	SEC 38
0167	CSA OFFICE & PTCE BLDG/VWC	4,358.0	SF2	1.9316	PMTRC		8,418.02
15339	..... CSA-VINYL WALL COVERINGS					N/A	88,418.82
0046	CSA FFSE BLDG-OH ROLL DP/MTR	9.0	EA2	8693.1346	PMTRQ		78,238.21
0070	CSA CNVYR BLDG-R.UP DR W/POTOP	2.0	EA2	6954.5077	PMTRQ		13,909.52
0109	CSA BLR-BLR HSE/R.UP DR W/MTR	2.0	EA2	5563.6062	PMTRC		11,127.21
15404	..... CSA-CH MOTOR OPERATED ROLL UP DOORS						1103,274.44
0099	CSA BLR-BLR HSE/CRANE FAIL	1.0	TC2	14113.7870	PMTRQ		14,113.70
15405	..... BLR HSE-CRANE RAIL SYSTEM						14,113.70
0177	EQUIP-RFSE BLDG/CONVEYER SYST	1.0	TC2	18364.8604	PMTRQ		18,364.86
15216	..... EQUIPMENT-REFUSE BUILDING						18,364.86
0178	EQUIP-CNVYR BLDG/CONVEYER SYST	1.0	TC2	74102.9799	PMTRQ		74,102.98
15217	..... EQUIPMENT-CONVEYOR BUILDING						74,102.98
0179	EQUIP-BLR BLDG/WTR CHUTE	1.0	TC2	4014.9119	PMTRQ		4,014.91
0180	EQUIP-BLR BLDG/PUMPS	1.0	TC2	30375.0180	PMTRQ		30,375.02
0181	EQUIP-BLR BLDG/CONVEYERS	1.0	TC2	13049.4243	PMTRQ		13,049.42
0182	EQUIP-BLR BLDG/TANKS	1.0	TC2	29310.7782	PMTRQ		29,310.78
0183	EQUIP-BLR BLDG/FIRE PUMP	1.0	TC2	2810.4384	PMTRQ		2,810.44
0184	EQUIP-BLR BLDG/FANS	1.0	TC2	28104.3836	PMTRQ		28,104.38
0185	EQUIP-BLR BLDG/BLR SYSTEM	1.0	TC2	237160.2720	PMTRQ		237,160.27
0186	EQUIP-BLR BLDG/MAM LIFT	1.0	TC2	4014.9119	PMTRQ		4,014.91
0187	EQUIP-BLR BLDG/TRUCK SCALE	1.0	TC2	6022.3679	PMTRQ		6,022.37
0188	EQUIP-BLR BLDG/TURBINE HEIST	1.0	TC2	2007.4560	PMTRQ		2,007.46
0189	EQUIP-BLR BLDG/AUX BOILER	1.0	TC2	6022.3679	PMTRQ		6,022.37
0190	EQUIP-BLR BLDG/FUEL STRGE TANK	1.0	TC2	16974.0488	PMTRQ		16,974.05
15218	..... EQUIPMENT-BOILER BUILDING						8379,866.38

Buy in order  
CONTAIN  
78,238.21  
13,909.52  
11,127.21

1,199,583

18,364.86

74,102.98

8379,866.38

MUST  
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10/1/88

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ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/RAY CNTY FL

PAGE: 9  
DATE: 07/04/01

ASSET TR-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 3P	SEC-36
0245	MECH-SITE/SNTRY SEWER	1.0	TCQ	32763.3276	PMTRQ	32,763.33	
0251	MECH-SITE/FIRE PROTECTION	1.0	TCQ	119349.7503	PMTRQ	119,349.79	
0110	MECHANICAL-SITE UTILITIES					N/A \$152,113.12	
0307	MECH-OFFEMTCE/FIRE PRCTN	1.0	TCQ	12558.2832	PMTRQ	N/A 12,558.28	
0310	MECHANICAL-FIRE PROTECTION SYSTEM					\$12,558.28	
0277	MECH-BLP BLDG/CITY WATER	1.0	TCQ	6703.6416	PMTRQ	6,703.64	
0299	MECH-RFSE BLDG/CITY WTR PPG	1.0	TCQ	80126.7643	PMTRQ	80,126.76	
0301	MECH-RFSE BLDG/ROOF PPGDRAINS	1.0	TCQ	255.3099	PMTRQ	255.31	
0305	MECH-OFFEMTCE/FIXTURES & FRG	1.0	TCQ	39180.7680	PMTRQ	39,180.77	
0322	MECHANICAL-PLUMBING PIPE					\$126,270.48	
0309	MECH-OFFEMTCE/HVAC	1.0	TCQ	52025.2526	PMTRQ	52,025.25	
0330	MECHANICAL-HVAC SYSTEM					N/A \$52,025.25	
0290	MECH-BLP BLDG/HVAC-ENL EXP	1.0	TCQ	585.8483	PMTRQ	585.85	
0331	MECHANICAL-HVAC EQUIPMENT					\$585.85	
0306	MECH-OFFEMTCE/ELECT WTR CLR	1.0	TCQ	3599.6058	PMTRQ		3,599.61
0360	MECHANICAL-ELECTRIC WATER COOLER					N/A	\$3,599.61
0246	MECH-SITE/COOLING WTR-TOWERS	1.0	TCQ	11647.8173	PMTRQ		11,647.52
0247	MECH-SITE/CBD SYSTEM	1.0	TCQ	44324.7085	PMTRQ		44,324.71
0248	MECH-SITE/INDUSTRIAL WTR	1.0	TCQ	31503.2737	PMTRQ		31,503.27
0249	MECH-SITE/CITY WTR SYSTEM	1.0	TCQ	11469.1816	PMTRQ		11,469.18
0570	MECHANICAL-SITE/EQUIP WATER SYSTEM						\$98,944.98

*Handwritten notes:*  
 WHAT IS FUNCTION OF CITY WATER PIPING TO PLUMBING?  
 WHAT ARE FUNCTIONS OF PIPE?  
 N/A

*Handwritten notes:*  
 N/A  
 IF PROBLEMS ON COOLING HEAT NO.

*Handwritten notes:*  
 WHAT IS FUNCTION?  
 ASSEMBLY?

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COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CITY FL

PAGE: 1  
DATE: 07/04/82

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	MON-SEC 38	SEC 36
0250	MECH-SITE/FUEL OIL SYSTEM	1.0	TOZ	11455.7359	PMTRQ		11,455.74
05702	MECHANICAL-SITE/EQUIP FUFL OIL SYSTEM						\$11,455.74
0252	MECH-SITE/INSTRUMENTATION	1.0	TOZ	432.1832	PMTRQ		432.18
05703	MECHANICAL-SITE/EQUIP INSTRUMENTATION						\$432.18
0253	MECH-SITE/WASTE TRTMT F. PROT	1.0	TOZ	1117.9139	PMTRQ		1,117.91
05704	MECHANICAL-SITE/EQUIP FIRE PROTECTION						\$1,117.91
0254	MECH-BLR BLDG/HOT WTR PIPING	1.0	TOZ	25531.4623	PMTRQ		25,531.46
0255	MECH-BLR BLDG/HOT WTR PPG VLVE	1.0	TOZ	1173.6175	PMTRQ		1,173.62
0256	MECH-BLR BLDG/HP STEAM PPG	1.0	TOZ	46664.2602	PMTRQ		46,664.26
0257	MECH-BLR BLDG/HP STEAM VALVES	1.0	TOZ	12018.5344	PMTRQ		12,018.53
0258	MECH-BLR BLDG/MED PRESS STEAM	1.0	TOZ	47219.3755	PMTRQ		47,219.38
0259	MECH-BLR BLDG/HP STEAM VALVES	1.0	TOZ	4921.1260	PMTRQ		4,921.13
0260	MECH-BLR BLDG/LDW PRESS STEAM	1.0	TOZ	19866.9813	PMTRQ		19,866.98
0261	MECH-BLR BLDG/LP STEAM PPG	1.0	TOZ	2049.5088	PMTRQ		2,049.51
0262	MECH-BLR BLDG/LP CONDSTE PPG	1.0	TOZ	12892.5049	PMTRQ		12,892.50
0263	MECH-BLR BLDG/LP CONDSTE VLVES	1.0	TOZ	4104.7799	PMTRQ		4,104.78
0264	MECH-BLR BLDG/BLR FEED WTR PPG	1.0	TOZ	54831.5621	PMTRQ		54,831.56
0265	MECH-BLR BLDG/CIRC WTR	1.0	TOZ	42061.9893	PMTRQ		42,061.99
0266	MECH-BLR BLDG/CIRC WTR VALVES	1.0	TOZ	14077.6473	PMTRQ		14,077.65
0267	MECH-BLR BLDG/BLOWDOWN PPG	1.0	TOZ	24526.7973	PMTRQ		24,526.80
0268	MECH-BLR BLDG/BLOWDOWN VALVES	1.0	TOZ	484.0452	PMTRQ		484.05
0269	MECH-BLR BLDG/SCSC SYSTEM	1.0	TOZ	1340.7283	PMTRQ		1,340.73
0270	MECH-BLR BLDG/UTILITY WATER	1.0	TOZ	973.8528	PMTRQ		973.85
0271	MECH-BLR BLDG/CHEMICAL FEED	1.0	TOZ	18605.0063	PMTRQ		18,605.01
0272	MECH-BLR BLDG/DHNLZD WTR	1.0	TOZ	24054.3562	PMTRQ		24,054.36
0273	MECH-BLR BLDG/COOLING WTR SYST	1.0	TOZ	68972.5963	PMTRQ		68,972.60
0274	MECH-BLR BLDG/BCHS-PCWF SYSTEM	1.0	TOZ	17562.0042	PMTRQ		17,562.00
0275	MECH-BLR BLDG/CPS-CFD SYSTEM	1.0	TOZ	19031.4271	PMTRQ		19,031.43
0276	MECH-BLR BLDG/BBG SYSTEM	1.0	TOZ	23489.6368	PMTRQ		23,489.64
0278	MECH-BLR BLDG/INDSTPL WASTE	1.0	TOZ	5026.7708	PMTRQ		5,026.77
0279	MECH-BLR BLDG/FUEL OIL PPG	1.0	TOZ	38650.6233	PMTRQ		38,650.62
0280	MECH-BLR BLDG/FUEL OIL VALVES	1.0	TOZ	3720.6171	PMTRQ		3,720.62
05705	MECHANICAL-BOILER BLDG/EQUIP PPG/VALVES						\$33,853.63

→ INITIAL  
FINDINGS  
& PREVENTING?  
IF SO YU

WHAT IS IT  
- WHATS IT DO

N/A

WHAT IS IT? FUNCTION

44-17-81  
24.

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COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CNTY FL

PAGE: 11  
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ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 36	SEC 36
0281	MECH-BLR BLDG/PROPANE SYSTEM	1.0	TD2	12398.8557	PHTRQ		12,398.86
(570F) .....	MECHANICAL-BOILER BLDG/PROPANE SYSTEM						12,398.86
0282	MECH-BLR BLDG/ACID SYSTEM	1.0	TD2	1886.2395	PHTRQ		1,886.24
(570G) .....	MECHANICAL-BOILER BLDG/ACID SYSTEM						1,886.24
0283	MECH-BLR BLDG/TURBINE EXH SYST	1.0	TD2	122319.3690	PHTRQ		122,319.37
(5711) .....	MECHANICAL-BOILER BLDG/TURBINE EXH SYST						122,319.37
0284	MECH-BLR BLDG/ASH HANDLING SYST	1.0	TD2	14187.1337	PHTRQ		14,187.13
(5712) .....	MECHANICAL-BOILER BLDG/ASH HANDLING SYST						14,187.13
0285	MECH-BLR BLDG/CAUSTIC WASTE	1.0	TD2	2022.6174	PHTRQ		2,022.62
(5713) .....	MECHANICAL-BOILER BLDG/CAUSTIC WASTE SYST						2,022.62
0286	MECH-BLR BLDG/FIRE PRCTN	1.0	TD2	43414.2425	PHTRQ		43,414.24
(5714) .....	MECHANICAL-BOILER BLDG/EQUIP FIRE PRCTN						43,414.24
0287	MECH-BLR BLDG/HVAC-EXH SYSTEM	1.0	TD2	45091.1133	PHTRQ		45,091.11
0288	MECH-BLR BLDG/HVAC-HEAT PUMP	1.0	TD2	180.5565	PHTRQ		180.56
0289	MECH-BLR BLDG/HVAC-UNIT HTRS	1.0	TD2	5508.8951	PHTRQ		5,508.90
0291	MECH-BLR BLDG/HVAC-EXP TANK	1.0	TD2	656.9185	PHTRQ		656.92
(5715) .....	MECHANICAL-BOILER BLDG/EQUIP HVAC SYSTEM						51,437.49
0292	MECH-BLR BLDG/INSTRUMENTATION	1.0	TD2	36495.4698	PHTRQ		36,495.47
(5716) .....	MECHANICAL-BOILER BLDG/INSTRUMENTATION						36,495.47

*How is it different than ES 8.01 - 0316 CLARIFY!*

*ES 8.01 CLARIFY OTHER INSTR. WHATS THE DIFF WHAT DO THEY DO.*



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 COST REPORT 4

ASSET DETAIL REPORT  
 WESTINGHOUSE-WASTE TO ENERFY/BAY CNTY FL

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ASSET	TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 3P	SEC 3P
	0293	MECH-BLR BLDG/EQUIP PPG INSLTN	1.0	TD2	76826.8055	PMTRQ		76,826.53
(5717	.....	MECHANICAL-BOILER BLDG/PIPING INSULATION						976,826.53
	0294	MECH-CNVYR BLDG/FIRE PROTIN	1.0	TD2	6033.2774	PMTRQ	N/A	6,033.28
(5718	.....	MECHANICAL-CONVEYOR BLDG/EQUIP FIRE PROT						96,033.28
	0295	MECH-CNVYR BLDG/GRVTY PF VENTS	1.0	TD2	50859.3184	PMTRQ		50,859.32
(5719	.....	MECHANICAL-CONVEYOR BLDG/EXHAUST SYSTEM						550,859.32
	0296	MECH-RFSE BLDG/WASTE PPG	1.0	TD2	28287.8307	PMTRQ		28,287.93
	0297	MECH-RFSE BLDG/FLR DRAIN PPG	1.0	TD2	41660.5392	PMTRQ		41,660.54
	0298	MECH-RFSE BLDG/GREASE INTFCPTR	1.0	TD2	7420.1053	PMTRQ		7,420.11
	0300	MECH-RFSE BLDG/WASHDOWN PPG	1.0	TD2	36213.1101	PMTRQ		36,213.11
	0304	MECH-RFSE BLDG/DRAIN PIPING	1.0	TD2	12366.2018	PMTRQ		12,366.20
(5721	.....	MECHANICAL-REFUSE BLDG/EQUIP PPG SYSTEM						9125,947.79
	0302	MECH-RFSE BLDG/FIRE PROTECTION	1.0	TD2	95568.1897	PMTRQ	N/A	95,568.19
(5722	.....	MECHANICAL-REFUSE BLDG/EQUIP FIRE PROT						995,568.19
	0303	MECH-RFSE BLDG/GRVTY ROOF VENT	1.0	TD2	97915.4246	PMTRQ		97,915.42
(5723	.....	MECHANICAL-REFUSE BLDG/EXHAUST SYSTEM						997,915.42
	0308	MECH-OFFENTCE/EQUIP VACUUM PPG	1.0	TD2	30256.6653	PMTRQ	N/A	30,256.67
(5724	.....	MECHANICAL-OFFENTCE BLDG/EQUIP VAC PPG						930,256.67
	0310	MECH-ADDER /COMPRESSED AIR	1.0	TD2	65355.7031	PMTRQ		65,355.70
(5725	.....	MECHANICAL-ADDER /COMPRESSED AIR SYSTEM						965,355.70

GENERAL  
 EXHAUST  
 FOR COMPTON  
 OR PHOTOL EXHAUST

PHOTOL

GENERAL  
 OR  
 PROCESS?

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ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/RAV CNTY FL

PAGE: 13  
DATE: 02/04/88

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NOV-SEC 3P	SEC 3P
0311	MECH-ADDER/INSTRUMENT AIR	1.0	TOZ	15174.4322	PMTRQ	<i>How is it from 65801</i>	15,174.42
15726	..... MECHANICAL-ADDER/INSTRUMENT AIR SYSTEM						15,174.43
0312	MECH-ADDER/PIPE PAINTING	1.0	TOZ	22734.7569	PMTRQ		22,734.76
15727	..... MECHANICAL-ADDER/PIPING SYSTEM PAINTING					<i>N/A</i>	22,734.76
3011	MECH-OFF EXH AUCTE/FIXTURES & PPG	1.0	TOZ	4353.0136	CLIENT		4,353.01
15728	..... MECHANICAL-OFF EXH AUCTE/FIXT & PPG					<i>N/A</i>	4,353.01
3012	MECH-OFF EXH AUCTE/HVAC	1.0	TOZ	5782.2467	CLIENT		5,782.25
15729	..... MECHANICAL-OFF EXH AUCTE/HVAC					<i>N/A</i>	5,782.25
0192	ELECT-SITE/PWR DISTRIBUTION	1.0	TOZ	5559.4114	PMTRQ		5,559.41
0197	ELECT-SITE/GROUND SYSTEM	1.0	TOZ	3254.1959	PMTRQ		3,254.20
0110	..... ELECTRICAL-SITE UTILITIES						8,813.61
0212	ELECT-RFSE BLDG/FIRE ALARM SYS	1.0	TOZ	18772.1385	PMTRQ		18,772.14
0223	ELECT-CNVYR BLDG/FIRE ALARM	1.0	TOZ	3313.7473	PMTRQ		3,313.75
0232	ELECT-BLR BLDG/FIRE ALARM SYST	1.0	TOZ	10225.5519	PMTRQ		10,225.55
0238	ELECT-OFF EXH AUCTE/FIRE ALARM SYST	1.0	TOZ	3842.0259	PMTRQ		3,842.03
0243	ELECT-WASTE TRT MNT/FIRE ALARM	1.0	TOZ	172.8912	PMTRQ		172.89
0110	..... ELECTRICAL-FIRE PROTECTION SYSTEM						36,326.36
0198	ELECT-RFSE BLDG/LTG PAMEL	1.0	TOZ	522.5155	PMTRQ		522.52
0201	ELECT-RFSE BLDG/GNL USE CPLX	1.0	TOZ	637.7763	PMTRQ		637.78
0205	ELECT-PFSE BLDG/GNL CNDC WIRE	1.0	TOZ	51744.4046	PMTRQ		51,744.40
0220	ELECT-CNVYR BLDG/GNL DPLX	1.0	TOZ	637.7763	PMTRQ		637.78
0221	ELECT-CNVYR BLDG/GNL CNDC WIRE	1.0	TOZ	6060.7958	PMTRQ		6,060.80
0229	ELECT-BLR BLDG/GNL USE DPLX	1.0	TOZ	1183.3440	PMTRQ		1,183.34
0230	ELECT-BLR BLDG/GNL CNDC WIRE	1.0	TOZ	14722.6432	PMTRQ		14,722.64

*How is it from 65801*

*N/A*

*N/A*

*N/A*  
*1999/1/32*

*WHAT IS THE FUNCTION IS IT PART OF PROCESS*

*N/A*



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VALTEC ASSOCIATES  
COST REPORT 4

ASSET DETAIL REPORT  
WASTINGHOUSE-WASTE TO ENERGY/9AY CATY FL

PAGE: 14  
DATE: 07/04/81

ASSET TY-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	404-SEC 38	SEC 38
0236	ELECT-BLR BLDG/LIGHTNING PROT	1.0	TC2	24237.4203	PMTRQ	24,237.42	
0240	ELECT-OFFCPTCE/PHR & LTG	1.0	TC2	47554.6753	PMTRQ	47,554.68	
04100	..... ELECTRICAL-POWER WIRING					\$147,301.36	
0206	ELECT-RFSE BLDG/GML LTE	1.0	TC2	53968.9375	PMTRQ	53,968.94	
0211	ELECT-RFSE BLDG/GML LTE CNDT	1.0	TC2	21982.1511	PMTRQ	21,982.15	
0222	ELECT-CNVYR BLDG/LIGHTING	1.0	TC2	6717.7823	PMTRQ	6,717.78	
0231	ELECT-BLR BLDG/LIGHTING	1.0	TC2	54691.2384	PMTRQ	54,691.24	
0242	ELECT-WSTE TRTMT/LIGHTING	1.0	TC2	868.2978	PMTRQ	868.30	
04200	..... ELECTRICAL-LIGHTING SYSTEM					\$138,228.41	
2003	ELECT-SITE/EQUIP PRIMARY PHR	1.0	TC2	50025.0980	PMTRQ		50,025.10
2004	ELECT-SITE/EQUIP GROUND SYST	1.0	TC2	29283.9213	PMTRQ		29,283.92
05205	..... SITE-ELECT/EQUIP PRIMARY POWER SYSTEM						\$79,309.02
2005	ELECT-MTCE SHGP EQUIP POWER	1.0	TC2	15850.2778	PMTRQ		15,850.28
05206	..... ELECT-MTCE SHGP EQUIP POWER						\$15,850.28
0191	ELECT-SITE/BLR GRTP CNFTWPE	1.0	TC2	17859.6573	PMTRQ		17,859.66
05501	..... ELECTRICAL-SITE/BOILER GENERATOR POWER						\$17,859.66
0199	ELECT-RFSE BLDG/EQUIP MTR CNCTM	1.0	TC2	1217.9222	PMTRQ		1,217.92
0200	ELECT-RFSE BLDG/EQUIP DSC. SMTG	1.0	TC2	1807.6732	PMTRQ		1,807.67
0202	ELECT-RFSE BLDG/60A WLDG DPLX	1.0	TC2	1392.7344	PMTRQ		1,392.73
0203	ELECT-RFSE BLDG/WLDG 60A FEED	1.0	TC2	6656.2309	PMTRQ		6,656.23
0204	ELECT-RFSE BLDG/EQUIP CONDUIT	1.0	TC2	5618.9629	PMTRQ		5,618.96
05502	..... ELECTRICAL-REFUSE BLDG/EQUIP HOOK UPS						\$16,695.51
0208	ELECT-RFSE BLDG/SIGNAL LIGHT	1.0	TC2	2255.2692	PMTRQ		2,255.27
0210	ELECT-RFSE BLDG/SGML LTG CNDT	1.0	TC2	1657.8342	PMTRQ		1,657.83

*Gen'l LIGHTING on system Related.*

*OK*

*N/A*

*define more clearly what is FUNCTION.*

*OK*

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COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CITY FL

PAGE: 15  
DATE: 02/04/86

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 38	SEC. 38
D5503	..... ELECTRICAL-REFUSE BLDG/SAFETY LIGHTING					N/A	93,913.10
0207	ELECT-REFUSE BLDG/WALL 400W HPS	1.0	TOD	11207.1895	PMTRQ		11,207.19
0209	ELECT-REFUSE BLDG/WALL LTG CNDT	1.0	TOD	2762.4166	PMTRQ		2,762.42
D5504	..... ELECTRICAL-REFUSE BLDG/EQUIP LIGHTING					ok	133,969.61
0216	ELECT-CNVYR BLDG/EQUIP MTR COMB	1.0	TOD	868.2978	PMTRQ		868.30
0217	ELECT-CNVYR BLDG/EQUIP DISC SW	1.0	TOD	1169.8969	PMTRQ		1,169.90
0218	ELECT-CNVYR BLDG/EQUIP CNDT	1.0	TOD	8608.0590	PMTRQ		8,608.06
0219	ELECT-CNVYR BLDG/EQUIP WIRE	1.0	TOD	4881.2939	PMTRQ		4,881.29
D5505	..... ELECTRICAL-CONVEYOR BLDG/EQUIP HOOK UPS						152,527.55
0224	ELECT-BLR BLDG/BLR EQUIP FWP	1.0	TOD	64790.0034	PMTRQ		64,790.00
0225	ELECT-BLR BLDG/BLR MTR CMCINS	1.0	TOD	16495.7381	PMTRQ		16,495.74
0226	ELECT-BLR BLDG/EQUIP DISC SWTCH	1.0	TOD	21363.5849	PMTRQ		21,363.58
0227	ELECT-BLR BLDG/EQUIP CNDTWIRE	1.0	TOD	189261.2470	PMTRQ		189,261.25
D5506	..... ELECTRICAL-BOILER BLDG/EQUIP HOOK UPS						329,193.57
0228	ELECT-BLR BLDG/15KW UPS SYST	1.0	TOD	34664.6785	PMTRQ	ok	34,664.68
D5507	..... ELECTRICAL-BOILER BLDG/UPS SYSTEM						334,664.68
0237	ELECT-BLR BLDG/INSTRUMENTATION	1.0	TOD	118328.6341	PMTRQ		118,328.63
D5508	..... ELECTRICAL-BOILER BLDG/INSTRUMENTATION						118,328.63
0241	ELECT-WSTE TRTMT/EQUIP PWP	1.0	TOD	643.5393	PMTRQ		643.54
0244	ELECT-WSTE TRTMT/EQUIP FEEDERS	1.0	TOD	3928.4715	PMTRQ		3,928.47
D5509	..... ELECTRICAL-WASTE TRTMT/EQUIP HOOK UPS						94,572.01

*Define more clearly what is function*

*Is this 65801 the difference?*

*we don't know. might be obs.*

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HALTEC ASSOCIATES  
COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CNTY FL

PAGE: 14  
DATE: 07/04/91

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 38	SEC 38
0193	ELECT-SITE/ROADWAY LIGHTING	1.0	TD2	85661.8090	PMTRQ		85,661.81
05511	..... ELECTRICAL-SITE/ROADWAY LIGHTING						<u>85,661.81</u>
3006	ELECT-CMVYP BLDG/SPCL LTG	1.0	TD2	745.3530	CLIENT		745.35
3007	ELECT-RFSE BLDG/SPCL LTG	1.0	TD2	5997.4024	CLIENT		5,997.40
3008	ELECT-RFSE BLDG/SPCL LTG CNDT	1.0	TD2	2443.5265	CLIENT		2,443.53
3009	ELECT-BLR BLDG/SPCL LTG	1.0	TD2	6076.1639	CLIENT		6,076.16
3010	ELECT-WSTE TRYMNT/SPCL LTG	1.0	TD2	96.0506	CLIENT		96.05
3013	ELECT-CMVYP BLDG/SPCL LTG CNDT	1.0	TD2	674.2755	CLIENT		674.25
3014	ELECT-BLR BLDG/SPCL LTG CNDT	1.0	TD2	1636.7030	CLIENT		1,636.70
05512	..... ELECTRICAL-SPECIAL LIGHTING						<u>17,669.47</u>
0194	ELECT-SITE/TELEPHONE SYSTEM	1.0	TD2	1010.4528	PMTRQ		1,010.45
0213	ELECT-RFSE BLDG/TEL SYSTEM	1.0	TD2	2130.4034	PMTRQ		2,130.40
0234	ELECT-BLR BLDG/TEL SYSTEM	1.0	TD2	2437.7654	PMTRQ		2,437.77
05600	..... ELECTRICAL-TELEPHONE SYSTEM						<u>5,578.62</u>
0196	ELECT-SITE/INTERCOM SYSTEM	1.0	TD2	1863.3826	PMTRQ		1,863.38
0214	ELECT-RFSE BLDG/INTERCOM SYST	1.0	TD2	6485.3397	PMTRQ		6,485.34
0233	ELECT-BLR BLDG/INTERCOM SYSTEM	1.0	TD2	4702.6397	PMTRQ		4,702.64
0239	ELECT-OFFICE/INTERCOM SYSTEM	1.0	TD2	3169.6714	PMTRQ		3,169.67
05611	..... ELECTRICAL-INTERCOMMUNICATION SYSTEM						<u>16,221.03</u>
0195	ELECT-SITE/CCTV SYSTEM	1.0	TD2	2082.3780	PMTRQ		2,082.38
0215	ELECT-RFSE BLDG/CCTV SYSTEM	1.0	TD2	7749.3662	PMTRQ		7,749.37
0235	ELECT-BLR BLDG/CCTV SYSTEM	1.0	TD2	5620.8839	PMTRQ		5,620.88
05623	..... ELECTRICAL-CLOSED CIRCUIT TV SYSTEM						<u>15,452.63</u>
0315	OWNER-EQUIP/PLUMBING	1.0	TD2	106688.3749	CLIENT	106,688.37	106,688.37
03200	..... OWNER-PLUMBING SYSTEM						<u>106,688.37</u>

N/A

WHAT IS IT?  
OUT SIDE RELATED  
PROCESS

N/A

OK

PROBABLY NO.

2752135

WHAT IS IT  
WHATS IS  
FUNCTION.  
HOW IS IT  
DIFFERENT

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VALTEC ASSOCIATES  
COST REPORT 4

ASSET DETAIL REPORT  
WESTINGHOUSE-WASTE TO ENERGY/BAY CNTY FL

PAGE: 17  
DATE: 07/04/86

ASSET TK-OFF	DESCRIPTION	QUANTITY	UNIT	IN-PLACE UNIT COST	SOURCE	NON-SEC 3P	SEC 3P
0314	OWNER-EQUIP/HVAC	1.0	TQ2	118177.8922	CLIENT	118,177.89	<i>same as 0315</i>
E3300	OWNER-HVAC SYSTEM					\$118,177.89	
0319	OWNER-EQUIP/ELECTRICAL	1.0	TQ2	34958.2120	CLIENT	34,958.21	<i>ditto how it is different</i>
E4100	OWNER-POWER WIRING					\$34,958.21	
2006	OWNER-UPS SYSTEM	1.0	TQ2	82067.9807	PMTRQ		<i>ditto how it is different</i> \$2,667.08
E5612	OWNER-UPS SYSTEM						\$2,667.08
2007	OWNER-CCTV SYSTEM	1.0	TQ2	106688.3749	PMTRQ		<i>ditto</i> \$106,688.37
E5613	OWNER-CCTV SYSTEM						\$106,688.37
0313	OWNER-EQUIP/VHICLESEINSTLTA	1.0	TQ2	8827232.0025	CLIENT		\$8,827,232.00
0316	OWNER-EQUIP/COMBUSTOREFOILER	1.0	TQ2	15264644.4075	CLIENT		15,264,644.41
0317	OWNER-EQUIP/TURBINE ENGINE	1.0	TQ2	2954447.3047	CLIENT		2,954,447.30
0318	OWNER-EQUIP/INST PMNT SEC CONTROL	1.0	TQ2	1572422.5099	CLIENT		1,572,422.51
0320	OWNER-EQUIP/FEEDWATER HTRS	1.0	TQ2	533441.8745	CLIENT		533,441.87
0321	OWNER-EQUIP/SHREDDER	1.0	TQ2	654543.8455	CLIENT		656,543.85
3001	OWNER-EQUIP/ELECTRICAL	1.0	TQ2	647106.0277	CLIENT		647,106.03
3002	OWNER-EQUIP/HVAC CONTROL	1.0	TQ2	52523.5076	CLIENT		52,523.51
3004	OWNER-EQUIP/BLR-ROOF VMTLTPS	1.0	TQ2	39392.6307	CLIENT		39,392.63
3005	OWNER-EQUIP/VALVE CONTROL	1.0	TQ2	52523.5300	CLIENT		52,523.53
E5901	OWNER-EQUIPMENT						\$30,600,777.64

PROJECT TOTAL

\$17,344,641.11 \$34,682,258.09  
\$42,027,000.00

**ATTACHMENT 2**

BAY COUNTY RESOURCE MANAGEMENT CENTER  
ORIGINAL FACILITY COSTS

	Asset Take-Off	Description	Quantity	Unit	In-Place Unit Cost	Source	Non-Section 38
	0001	CSA Site Clearing & Grading	1	To	317,203	PMTRQ	317,203
<b>1100</b>		<b>CSA-Site Improvements</b>					<b>317,203</b>
	0002	CSA Site-Storm System	1	To	65,846	PMTRQ	65,846
	0009	CSA Site-Headwalls/Storm	1	To	17,193	PMTRQ	17,193
<b>1110</b>		<b>CSA-Site Utilities</b>					<b>83,039</b>
	0051	CSA-Conveyor Bldg-Machine Excavation	1	To	1,601	PMTRQ	1,601
	0052	CSA-Conveyor Bldg-Hand Excavation	1	To	719	PMTRQ	719
	0053	CSA-Conveyor Bldg-Machine Backfill	1	To	2,376	PMTRQ	2,376
	0054	CSA-Conveyor Bldg-Hand Backfill	1	To	415	PMTRQ	415
	0055	CSA-Conveyor Bldg-Fine Grade	1	To	668	PMTRQ	668
	0056	CSA-Conveyor Bldg-Stone Fill	1	To	3,725	PMTRQ	3,725
	0057	CSA-Conveyor Bldg-Vapor Barrier	1	To	475	PMTRQ	475
	0058	CSA-Conveyor Bldg-Piles & Pile Caps	1	To	28,046	PMTRQ	28,046
	0059	CSA-Conveyor Bldg-Grade Beam	1	To	1,319	PMTRQ	1,319
	0060	CSA-Conveyor Bldg-Slab on Grade	1	To	10,888	PMTRQ	10,888
	0062	CSA-Conveyor Bldg-Formwork	1	To	8,604	PMTRQ	8,604
	0063	CSA-Conveyor Bldg-Concrete Rebar	1	To	4,076	PMTRQ	4,076
	0076	CSA-Boiler Bldg-HSE/Machine Excavation	1	To	10,140	PMTRQ	10,140
	0077	CSA-Boiler Bldg-HSE/Hand Excavation	1	To	4,493	PMTRQ	4,493
	0078	CSA-Boiler Bldg-HSE/Machine Backfill	1	To	15,035	PMTRQ	15,035
	0079	CSA-Boiler Bldg-HSE/Hand Backfill	1	To	2,592	PMTRQ	2,592
	0080	CSA-Boiler Bldg-HSE/Fine Grade	1	To	2,185	PMTRQ	2,185
	0081	CSA-Boiler Bldg-HSE/Stone Fill	1	To	15,190	PMTRQ	15,190
	0082	CSA-Boiler Bldg-HSE/Vapor Barrier	1	To	1,553	PMTRQ	1,553
	0083	CSA-Boiler Bldg-HSE/Piles & Pile Cap	1	To	156,264	PMTRQ	156,264
	0084	CSA-Boiler Bldg-HSE/Grade Beam	1	To	5,940	PMTRQ	5,940
	0085	CSA-Boiler Bldg-HSE/Slab on Grade	1	To	31,288	PMTRQ	31,288
	0090	CSA-Boiler Bldg-HSE/Forms-Piles	1	To	16,343	PMTRQ	16,343
	0091	CSA-Boiler Bldg-HSE/Forms-Slabs	1	To	477	PMTRQ	477
	0092	CSA-Boiler Bldg-HSE/Forms-Grade Beam	1	To	21,967	PMTRQ	21,967
	0093	CSA-Boiler Bldg-HSE/Forms-Slab on Grade	1	To	3,873	PMTRQ	3,873
	0094	CSA-Boiler Bldg-HSE/Forms-Misc.	1	To	23,748	PMTRQ	23,748
	0095	CSA-Boiler Bldg-HSE/Concrete Finish	1	To	15,756	PMTRQ	15,756
	0096	CSA-Boiler Bldg-HSE/Concrete Rebar	1	To	50,606	PMTRQ	50,606
	0142	CSA-Boiler-Waste Treatment/Foundations	1	To	48,110	PMTRQ	48,110
	0144	CSA-Boiler-Waste Bldg/Earthwork	1	To	3,245	PMTRQ	3,245
	0145	CSA-Boiler-Waste Bldg/Slab on Grade	1	To	1,466	PMTRQ	1,466
	0146	CSA-Boiler-Waste Bldg/Formwork	1	To	920	PMTRQ	920
	0147	CSA-Boiler-Waste Bldg/Finish	1	To	415	PMTRQ	415
	0148	CSA-Boiler-Waste Bldg/Reinforcing	1	To	1,428	PMTRQ	1,428
<b>2100</b>		<b>CSA-Substructure</b>					<b>495,947</b>
	0065	CSA-Conveyor Bldg-Structural	1	To	61,659	PMTRQ	61,659
	0066	CSA-Conveyor Bldg-Grating	1	To	17,543	PMTRQ	17,543
	0067	CSA-Conveyor Bldg-Handrail	1	To	19,463	PMTRQ	19,463
	0098	CSA-Boiler Bldg-HSE/Structural	1	To	154,147	PMTRQ	154,147
	0100	CSA-Boiler Bldg-HSE/Metal Deck	1	To	5,401	PMTRQ	5,401
	0101	CSA-Boiler Bldg-HSE/Grating	1	To	263,141	PMTRQ	263,141
	0102	CSA-Boiler Bldg-HSE/Handrail	1	To	34,601	PMTRQ	34,601
	0103	CSA-Boiler Bldg-HSE/Stairs	1	To	57,840	PMTRQ	57,840
	0104	CSA-Boiler Bldg-HSE/Landings	1	To	17,276	PMTRQ	17,276
	0151	CSA-Boiler-Waste Bldg/Bar Joists	1	To	1,522	PMTRQ	1,522
	0152	CSA-Boiler-Waste Bldg/Deck	1	To	1,095	PMTRQ	1,095
	0153	CSA-Boiler-Waste Bldg/Mstre Pfdt	1	To	5,059	PMTRQ	5,059
<b>2200</b>		<b>CSA-Framing System</b>					<b>638,448</b>

Asset Take-Off	Description	Quantity	Unit	In-Place Unit Cost	Source	Non-Section 38
0086	CSA-Boiler Bldg-HSE/Elevated Slab	1	To	3,682	PMTRQ	3,682
<b>2300</b>	<b>CSA-Floor Structure</b>					<b>3,682</b>
0069	CSA-Conveyor Bldg-Doors & Frame	1	To	2,409	PMTRQ	2,409
0097	CSA-Boiler Bldg-HSE/Prefab Bldg	1	To	711,268	PMTRQ	711,268
0108	CSA-Boiler Bldg-HSE/HM Doors & Frames	1	To	18,501	PMTRQ	18,501
0154	CSA-Boiler-Waste Bldg/Doors & Windows	1	To	2,822	PMTRQ	2,822
<b>2600</b>	<b>CSA-Doors &amp; Windows</b>					<b>735,001</b>
0064	CSA-Conveyor Bldg-Prefab Bldg	1	To	267,635	PMTRQ	267,635
<b>2650</b>	<b>CSA-Prefabricated Buildings</b>					<b>267,635</b>
0106	CSA-Boiler Bldg-HSE/Masonry	1	To	179,869	PMTRQ	179,869
0107	CSA-Boiler Bldg-HSE/Carpentry	1	To	9,176	PMTRQ	9,176
0149	CSA-Boiler-Waste Bldg/Masonry	1	To	21,636	PMTRQ	21,636
0150	CSA-Boiler Bldg/Carpentry	1	To	782	PMTRQ	782
0176	CSA-Misc. Revisions	1	To	18,994	PMTRQ	18,994
<b>2700</b>	<b>CSA-Interior Enclosures</b>					<b>230,457</b>
0071	CSA-Conveyor Bldg-Paint Structural	1	To	3,468	PMTRQ	3,468
0072	CSA-Conveyor Bldg-Paint Grating	1	To	1,824	PMTRQ	1,824
0073	CSA-Conveyor Bldg-Paint Handrail	1	To	3,495	PMTRQ	3,495
0074	CSA-Conveyor Bldg-Paint Doors & Frames	1	To	1,750	PMTRQ	1,750
0113	CSA-Boiler Bldg-HSE/Painting	1	To	104,378	PMTRQ	104,378
0155	CSA-Boiler-Waste Bldg/Painting	1	To	4,281	PMTRQ	4,281
<b>2800</b>	<b>CSA-Interior Finishes</b>					<b>119,194</b>
0068	CSA-Conveyor Bldg-Metal Canopy	1	To	11,977	PMTRQ	11,977
<b>5103</b>	<b>CSA-Metal Capopies</b>					<b>11,977</b>
00887	CSA-Boiler Bldg-HSE/Misc Equipment Concrete	1	To	7,720	PMTRQ	7,720
0089	CSA-Boiler Bldg-HSE/Forms-Equipment Footings	1	To	10,005	PMTRQ	10,005
0143	CSA Boiler-Waste Treatment/Equipment Foundations	1	To	28,971	PMTRQ	28,971
0156	CSA-Boiler-Fuel Oil Storage Footings	1	To	21,636	PMTRQ	21,636
<b>5106</b>	<b>CSA-Boiler Building/Equipment Footings &amp; Foundations</b>					<b>68,332</b>
0105	CSA-Boiler Bldg-HSE/Panel Dust Protection	1	To	61,808	PMTRQ	61,808
<b>5107</b>	<b>CSA-Boiler Building/Dust Protection Panels</b>					<b>61,808</b>
0157	CSA-Boiler-Fuel Oil Storage/Dike	1	To	2,890	PMTRQ	2,890
<b>5115</b>	<b>CSA-Boiler-Fuel Oil Storage/Dike</b>					<b>2,890</b>
2001	CSA-Conveyor Bldg-Piles & Pile Caps	1	To	4,949	PMTRQ	4,949
<b>5203</b>	<b>Conveyor Building Equipment Foundations</b>					<b>4,949</b>
2002	CSA-Boiler Bldg-Piles & Pile Caps	1	To	104,177	PMTRQ	104,177
<b>5204</b>	<b>Boiler Building Equipment Foundations</b>					<b>104,177</b>
0112	CSA-Boiler Bldg-HSE/Acoustical	2168	SF	2	PMTRQ	3,560
<b>5301</b>	<b>CSA-Acoustical Ceilings</b>					<b>3,560</b>
0110	CSA-Boiler Bldg-HSE/Vinyl Flooring	2168	SF	2	PMTRQ	4,188
0111	CSA-Boiler Bldg-HSE/Vinyl Base	280	LF	1	PMTRQ	379
<b>5304</b>	<b>CSA-Removable Floor Coverings</b>					<b>4,567</b>
0070	CSA-Conveyor Bldg-Rollup Door W/Motor	2	EA	6,955	PMTRQ	13,909
0109	CSA-Boiler Bldg-HSE/Vinyl Flooring	2	EA	5,564	PMTRQ	11,127
<b>5404</b>	<b>CSA-Channel Motor Operated Roll Up Doors</b>					<b>25,036</b>
0099	CSA-Boiler-Boiler HSE/Crane Rail	1	TO	14,114	PMTRQ	14,114
<b>5405</b>	<b>Boiler HSE-Crane Rail System</b>					<b>14,114</b>

Asset Take-Off	Description	Quantity	Unit	In-Place Unit Cost	Source	Non-Section 38
0177	EQUIP-Refuse Bldg/Conveyor System	1	TO	18,365	PMTRQ	18,365
<b>5216</b>	<b>Equipment-Refuse Building</b>					<b>18,365</b>
0178	EQUIP-Conveyor Bldg/Conveyor System	1	TO	74,103	PMTRQ	74,103
<b>5217</b>	<b>Equipment-Conveyor Building</b>					<b>74,103</b>
0179	EQUIP-Boiler Bldg/Water Chute	1	To	4,015	PMTRQ	4,015
0180	EQUIP-Boiler Bldg/Pumps	1	To	30,375	PMTRQ	30,375
0181	EQUIP-Boiler Bldg/Conveyors	1	To	13,049	PMTRQ	13,049
0182	EQUIP-Boiler Bldg/Tanks	1	To	29,311	PMTRQ	29,311
0184	EQUIP-Boiler Bldg/Fans	1	To	28,104	PMTRQ	28,104
0185	EQUIP-Boiler Bldg/Boiler System	1	To	237,160	PMTRQ	237,160
0189	EQUIP-Boiler Bldg/Auxiliary Boiler	1	To	6,022	PMTRQ	6,022
0190	EQUIP-Boiler Bldg/Fuel Storage Tank	1	To	16,974	PMTRQ	16,974
<b>5218</b>	<b>Equipment-Boilder Building</b>					<b>365,011</b>
02458	MECH-Site/Sntry Sewer	1	To	32,763	PMTRQ	32,763
<b>1110</b>	<b>Mechanical Site Utilities</b>					<b>32,763</b>
0290	MECH-Boiler Bldg-HVAC General Exhaust	1	To	586	PMTRQ	586
<b>3310</b>	<b>Mechanical-HVAC Equipment</b>					<b>586</b>
0250	MECH-Site/Fuel Oil System	1	TO	11,456	PMTRQ	11,456
<b>5702</b>	<b>Mechanical Site/Equipment Fuel Oil System</b>					<b>11,456</b>
0252	MECH-Site/Instrumentation	1	TO	432	PMTRQ	432
<b>5703</b>	<b>Mechanical-Site/Equipment Instrumentation</b>					<b>432</b>
0254	MECH-Boiler Bldg/Hot Water Piping	1	TO	25,531	PMTRQ	25,531
0255	MECH-Boiler Bldg/Hot Water PPG Valve	1	TO	1,174	PMTRQ	1,174
0256	MECH-Boiler Bldg/High Pressure Steam PPG	1	TO	46,664	PMTRQ	46,664
0257	MECH-Boiler Bldg/High Pressure Steam Valves	1	TO	12,019	PMTRQ	12,019
0258	MECH-Boiler Bldg/Medium Pressure Steam	1	TO	47,219	PMTRQ	47,219
0259	MECH-Boiler Bldg/Medium Pressure Steam Valves	1	TO	4,921	PMTRQ	4,921
0260	MECH-Boiler Bldg/Low Pressure Steam	1	TO	19,867	PMTRQ	19,867
0261	MECH-Boiler Bldg/Low Pressure PPG	1	TO	2,050	PMTRQ	2,050
0262	MECH-Boiler Bldg/Low Pressure Condensed Steam PPG	1	TO	12,893	PMTRQ	12,893
0263	MECH-Boiler Bldg/Low Pressure Condensed Steam Valves	1	TO	4,105	PMTRQ	4,105
0264	MECH-Boiler Bldg/Boiler Feed Water PPG	1	TO	54,832	PMTRQ	54,832
0267	MECH-Boiler Bldg/Blowdown PPG	1	TO	24,529	PMTRQ	24,529
0268	MECH-Boiler Bldg/Blowdown Valves	1	TO	484	PMTRQ	484
0269	MECH-Boiler Bldg/SC5C System	1	TO	1,341	PMTRQ	1,341
0270	MECH-Boiler Bldg/Utility Water	1	TO	974	PMTRQ	974
0271	MECH-Boiler Bldg/Chemical Feed	1	TO	18,605	PMTRQ	18,605
0272	MECH-Boiler Bldg/Demineralized Water	1	TO	24,054	PMTRQ	24,054
0273	MECH-Boiler Bldg/Cooling Water System	1	TO	68,973	PMTRQ	68,973
0274	MECH-Boiler Bldg/BC Water System-BCWP System	1	TO	17,562	PMTRQ	17,562
0275	MECH-Boiler Bldg/CP5-CPD System	1	TO	19,031	PMTRQ	19,031
0276	MECH-Boiler Bldg/BBD System	1	TO	23,490	PMTRQ	23,490
0278	MECH-Boiler Bldg/Industrial Waste	1	TO	5,027	PMTRQ	5,027
0279	MECH-Boiler Bldg/Fuel Oil PPG	1	TO	38,651	PMTRQ	38,651
0280	MECH-Boiler Bldg/Fuel Oil Valves	1	TO	3,721	PMTRQ	3,721
<b>5705</b>	<b>Mechanical-Boiler Bldg/Equipment PPG &amp; Valves</b>					<b>452,183</b>
0281	MECH-Boiler Bldg/Propane System	1	TO	12,399	PMTRQ	12,399
<b>5708</b>	<b>Mechanical-Boiler Bldg/Propane System</b>					<b>12,399</b>
0282	MECH-Boiler Bldg/Acid System	1	TO	1,886	PMTRQ	1,886
<b>5709</b>	<b>Mechanical-Boiler Bldg/Acid System</b>					<b>1,886</b>
0283	MECH-Boiler Bldg/Turbine Exhaust System	1	TO	122,319	PMTRQ	122,319



Asset Take-Off	Description	Quantity	Unit	In-Place Unit Cost	Source	Non-Section 38
5711	<b>Mechanical-Boiler Bldg/Turbine Exhaust System</b>					<b>122,319</b>
0284	MECH-Boiler Bldg/Ash Handling System	1	TO	14,187	PMTRQ	14,187
5712	<b>Mechanical-Boiler Bldg/Ash Handling System</b>					<b>14,187</b>
0285	MECH-Boiler Bldg/Caustic Waste System	1	TO	2,023	PMTRQ	2,023
5713	<b>Mechanical-Boiler Bldg/Caustic Waste System</b>					<b>2,023</b>
0287	MECH-Boiler Bldg/HVAC Exhaust System	1	TO	45,091	PMTRQ	45,091
0288	MECH-Boiler Bldg/HVAC Heat Pump	1	TO	181	PMTRQ	181
0289	MECH-Boiler Bldg/HVAC Unit Heaters	1	TO	5,509	PMTRQ	5,509
0291	MECH-Boiler Bldg/HVAC Exp Tank	1	TO	657	PMTRQ	657
5715	<b>Mechanical-Boiler Bldg/Equipment HVAC System</b>					<b>51,437</b>
0292	MECH-Boiler Bldg/Instrumentation	1	TO	36,495	PMTRQ	36,495
5716	<b>Mechanical-Boiler Bldg/Instrumentation</b>					<b>36,495</b>
0293	MECH-Boiler Bldg/Equipment PPG Insulation	1	TO	76,827	PMTRQ	76,827
5717	<b>Mechanical-Boiler Bldg/Piping Insulation</b>					<b>76,827</b>
0295	MECH-Conveyor Bldg/Gravity PF Vents	1	TO	50,859	PMTRQ	50,859
5719	<b>Mechanical-Conveyor Bldg/Exhaust System</b>					<b>50,859</b>
0310	MECH-Adder/Compressed Air	1	TO	65,356	PMTRQ	65,356
5725	<b>Mechanical-Adder/Compressed Air System</b>					<b>65,356</b>
0311	MECH-Adder/Instrument Air	1	TO	15,174	PMTRQ	15,174
5726	<b>Mechanical-Adder/Instrument Air System</b>					<b>15,174</b>
0312	MECH-Adder/Pipe Painting	1	TO	22,735	PMTRQ	22,735
5727	<b>Mechanical-Adder/Piping System Painting</b>					<b>22,735</b>
0192	ELECT-Site/Power Distribution	1	TO	5,559	PMTRQ	5,559
0197	ELECT-Site/Ground System	1	TO	3,254	PMTRQ	3,254
1110	<b>Electrical-Site Utilities</b>					<b>8,814</b>
0223	ELECT-Conveyor Bldg/Fire Alarm	1	TO	3,314	PMTRQ	3,314
0232	ELECT-Boiler Bldg/Fire Alarm System	1	TO	10,226	PMTRQ	10,226
0243	ELECT-Waste Treatment/Fire Alarm	1	TO	173	PMTRQ	173
3100	<b>Electrical-Fire Protection System</b>					<b>13,712</b>
0220	ELECT-Conveyor Bldg/General Duplex	1	TO	638	PMTRQ	638
0221	ELECT-Conveyor Bldg/General Conduit & Wire	1	TO	6,061	PMTRQ	6,061
0229	ELECT-Boiler Bldg/General Use Duplex	1	TO	1,183	PMTRQ	1,183
0230	ELECT-Boiler Bldg/General Conduit & Wire	1	TO	14,723	PMTRQ	14,723
0236	ELECT-Boiler Bldg/Lightening Protection	1	TO	24,237	PMTRQ	24,237
4100	<b>Electrical-Power Wiring</b>					<b>46,842</b>
0222	ELECT-Conveyor Bldg/Lighting	1	TO	6,718	PMTRQ	6,718
0231	ELECT-Boiler Bldg/Lighting	1	TO	54,691	PMTRQ	54,691
0242	ELECT-Waste Treatment/Lighting	1	TO	868	PMTRQ	868
4200	<b>Electrical-Lighting System</b>					<b>62,277</b>
0191	ELECT-Site/Boiler Generator Conduit & Wire	1	TO	17,860	PMTRQ	17,860
5501	<b>Electrical-Site/Boiler Generator Power</b>					<b>17,860</b>
0216	ELECT-Conveyor Bldg/Equipment Master Connections	1	TO	868	PMTRQ	868
0217	ELECT-Conveyor Bldg/Equipment Disconnect Switch	1	TO	1,170	PMTRQ	1,170
0218	ELECT-Conveyor Bldg/Equipment Conduit	1	TO	8,608	PMTRQ	8,608
0219	ELECT-Conveyor Bldg/Equipment Wire	1	TO	4,881	PMTRQ	4,881
5505	<b>Electrical Conveyor Building/Equipment Hook Ups</b>					<b>15,528</b>

Asset Take-Off	Description	Quantity	Unit	In-Place Unit Cost	Source	Non-Section 38
0224	ELECT-Boiler Bldg/Boiler Equipment PWP	1	TO	64,790	PMTRQ	64,790
0225	ELECT-Boiler Bldg/Boiler Motor Concection	1	TO	16,496	PMTRQ	16,496
0226	ELECT-Boiler Bldg/Equipment Disconnect Switch	1	TO	21,364	PMTRQ	21,364
0227	ELECT-Boiler Bldg/Equipment Conduit & Wire	1	TO	189,281	PMTRQ	189,281
<b>5506</b>	<b>Electrical-Boiler Bldg/Equipment Hook Ups</b>					<b>291,931</b>
0228	ELECT-Boiler Bldg/15KW UPS System	1	TO	34,665	PMTRQ	34,665
<b>5507</b>	<b>Electrical-Boiler Bldg/UPS System</b>					<b>34,665</b>
0237	ELECT-Boiler Bldg/Instrumentation	1	TO	118,329	PMTRQ	118,329
<b>5508</b>	<b>Electrical-Boiler Bldg/Instrumentation</b>					<b>118,329</b>
3006	ELECT-Conveyor Bldg/Special Lighting	1	TO	745	Client	745
3009	ELECT-Boiler Bldg/Special Lighting	1	TO	6,076	Client	6,076
3013	ELECT-Conveyor Bldg/Special Lighting Conduit	1	TO	674	Client	674
3014	ELECT-Boiler Bldg/Special Lighting Conduit	1	TO	1,637	Client	1,637
<b>5512</b>	<b>Electrical-Special Lighting</b>					<b>9,132</b>
0196	ELECT-Site/Intercom System	1	TO	1,863	PMTRQ	1,863
0233	ELECT-Boiler Bldg/Intercom System	1	TO	4,703	PMTRQ	4,703
<b>5611</b>	<b>Electrical-Intercommunication System</b>					<b>6,566</b>
0235	ELECT-Boiler Bldg/CCTV System	1	TO	5,621	PMTRQ	5,621
<b>5613</b>	<b>Electrical-Closed Circuit TV System</b>					<b>5,621</b>
0315	OWNER-Equipment/Plumbing	1	TO	106,688	Client	106,688
<b>3200</b>	<b>Owner-Plumbing System</b>					<b>106,688</b>
0314	OWNER-Equipment/HVAC	1	TO	118,178	Client	118,178
<b>3300</b>	<b>Owner-HVAC System</b>					<b>118,178</b>
0319	OWNER-Equipment/Electrical	1	TO	34,058	Client	34,058
<b>4100</b>	<b>Owner-Power Wiring</b>					<b>34,058</b>
2006	OWNER-Equipment/UPS System	1	TO	82,068	PMTRQ	82,068
<b>5612</b>	<b>Owner-UPS System</b>					<b>82,068</b>
2007	OWNER-Equipment/CCTV System	1	TO	106,688	PMTRQ	106,688
<b>5613</b>	<b>Owner-CCTV System</b>					<b>106,688</b>
0316	OWNER-Equipment/Combustor & Boiler	1	TO	15,264,644	Client	15,264,644
0318	OWNER-Equipment/Instruments & Controls	1	TO	1,572,423	Client	1,572,423
0320	OWNER-Equipment/Feedwater Heaters	1	TO	533,442	Client	533,442
3001	OWNER-Equipment/Electrical	1	TO	647,106	Client	647,106
3002	OWNER-Equipment/HVAC Controls	1	TO	52,524	Client	52,524
3004	OWNER-Equipment/Boiler-Roof Ventalitors	1	TO	39,393	Client	39,393
3005	OWNER-Equipment/Valve Controls	1	TO	52,524	Client	52,524
<b>5801</b>	<b>Owner-Equipment</b>					<b>18,162,054</b>
					<b>TOTAL=</b>	<b>23,859,624</b>

## Mitchell, Bruce

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**From:** Mcneal.Dave@epamail.epa.gov  
**Sent:** Thursday, January 28, 2010 10:59 AM  
**To:** Mitchell, Bruce  
**Cc:** Rinck.Todd@epamail.epa.gov  
**Subject:** Re: FW: Bay County re-rate project

**Attachments:** L012010\_678-to Client.pdf



L012010\_678-to  
Client.pdf (1 M...

Bruce:

Based upon the information provided by Golder and Associates, the cost for replacing fan blades in order to "re-rate" the Bay County Resource Recovery facility is well below the annual asset guideline repair allowance for resource recovery plants. Therefore, the cost of these changes would not constitute a capital expenditure, and consistent with our December 21, 2009, determination, the re-rated facility would be subject to Part 60, Subpart Cb, instead of Part 60 Subpart Eb.

David McNeal  
EPA Region 4  
404-562-9102

**From:** "Mitchell, Bruce" <Bruce.Mitchell@dep.state.fl.us>  
**To:** Dave McNeal/R4/USEPA/US@EPA  
**Cc:** "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>, "Vielhauer, Trina" <Trina.Vielhauer@dep.state.fl.us>  
**Date:** 01/21/2010 11:19 AM  
**Subject:** FW: Bay County re-rate project

1/21/2010

Good morning, Dave. I am forwarding a response to your applicability determination letter of December 21, 2009, prepared by Golder Associates, Inc., on behalf of the Bay County Resource Recovery Facility and their rerating request for the two municipal waste combustor units 1 and 2. Would you please evaluate the response to see if it provides you with sufficient information to make a final determination regarding NSPS applicability. If you can determine that their response is adequate to make the applicability determination, then what is that decision. If there are any questions, please give me a call at 850/413-9198. Many thanks and take care.

Bruce Mitchell  
FDEP/DARM/BAR-NSR

**From:** Gonzalez, Natalia [mailto:Natalia\_Gonzalez@golder.com]  
**Sent:** Thursday, January 21, 2010 10:55 AM  
**To:** Vielhauer, Trina; Mitchell, Bruce

Cc: brookinsr@ENGENLLC.com; CAINEK@engenllc.com; GNV- Document Production; Buff, Dave  
Subject: Bay County re-rate project

Ms. Vielhauer,

Please find attached a letter requesting concurrence from FDEP that the Bay County Resource Recovery Facility will trigger the requirements of 40 CFR 60 Subpart Cb. A hard copy will be mailed today as well.

If you have any questions, please do not hesitate to contact me.

Best Regards,  
Natalia

Natalia Gonzalez, E.I. | Air Engineer | Golder Associates Inc.  
6241 NW 23rd Street, Suite 500, Gainesville, Florida, USA 32653  
T: +1 (352) 336-5600 | F: +1 (352) 336-6603 | E:  
Natalia\_Gonzalez@golder.com | www.golder.com

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(See attached file: L012010\_678-to Client.pdf)



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

March 29, 2010

*Sent by Electronic Mail – Received Receipt Requested*

Mr. Glenn Ogborn  
Solid Waste Superintendent  
Bay County Utility Services  
Bay County Resource Recovery Facility  
3410 Transmitter Road  
Panama City, Florida 33404

Re: Project No. 0050031-012-AC  
Request for Additional Information  
Bay County Resource Recovery Facility, Units 1 and 2  
Request to Rerate Units 1 and 2

Dear Mr. Ogborn:

On February 1, 2010, the Department received a request for an air construction permit to authorize the rerating of Units 1 and 2 from 245 tons per day per unit throughput to 255 tons per day per unit throughput. Initial construction was authorized under PSD-FL-129. The application is incomplete. Based on our review of the proposed project, we have determined that the following additional information is needed in order to continue processing this request. Please provide all assumptions, calculations and reference materials that are used or reflected in any of your responses to the following issues:

1. The plant installed air pollution controls prior to November 2005. The “baseline actual emissions (BAE)” should reflect actual emissions after the installation of these controls. In addition, the compliance date pursuant to NSPS Subpart BBBB in 40 CFR 60 was November 16, 2005. The purpose of the NSR Reform regulations is to compare “actual” emissions. In Rule 62-210.200, Florida Administrative Code (F.A.C.), part of the definition of *actual emissions* is, “In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date **and which is representative of the normal operation of the emissions unit.**” Revise the baseline actual emissions as follows: to establish the baseline actual activity level (e.g., steam production), you may use a 2-year baseline period (for production data) that occurs before the installation of new air pollution controls; however, actual emissions data obtained *after* the installation of the new air pollution controls must be used because of the extent of this project. For pollutants with stack test data, use the available stack tests conducted after the control systems were installed.
2. The application maintains that the “re-rating” will not result in an actual change in the emissions profile from the units. In other words, although the “lb/hour” emissions may increase when firing above 245 tons/day, the “lb/ton of waste” (or lb/1000 lb of steam) would not increase. Therefore, the emission factor used to determine “projected actual emissions (PAE)” should be the same as the emission factor used for the BAE. The purpose of the evaluation is to determine whether the “actual” emissions increases caused by the project will result in a PSD significant emissions increase. Increasing the emission factor used for determining PAE above the emission factor used for BAE suggests that the proposed physical change will result in an increased actual emissions profile for the units. In the future, when reporting emissions after completing the project, the plant is afforded the opportunity to explain emissions increases and whether these are related to the project. This

## REQUEST FOR ADDITIONAL INFORMATION

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should not be done during preconstruction review when no facts are available with regard to actual emissions changes.

3. Any revised emission calculations must follow the procedures pursuant to Rule 62-210.370, F.A.C. and the required hierarchy for using the highest quality emissions factors. If you have any questions regarding a unique circumstance, please contact us and we will interpret these requirements for you with regard to this rule.
4. See the third paragraph in Section 2.2 of the project discussion. Explain the rationale for basing the “maximum hourly rates” on 110% of the 24-hour average? Does the plant intend to conduct compliance tests within 90% of the “maximum hourly steaming rate” based on this methodology?
5. Provide a list of the specific applicable requirements contained in 40 CFR 60, Subpart Cb.
6. Compliance Assurance Monitoring (CAM) is required for all control devices that are being used to control the emissions for a certain pollutant that has a specific emissions limiting standard where the potential emissions of that pollutant would be greater than the Title V applicability levels without the control device. Emissions units subject to a post 1990 federal standard are exempt from complying with the CAM requirements, but only for the specific pollutant and specific standard addressed by the Federal regulation. There are currently several pollutants (i.e. fluorides, hydrogen chloride and sulfuric acid mist ) regulated by the PSD permit that are either not regulated by or have higher allowable emissions limitations than the new federal limitations from 40 Code of Federal Regulation (CFR) 60, Subpart Cb. These pollutants are subject to CAM if their pre-controlled emissions potentials are greater than the Title V applicability levels. Please provide a CAM applicability determination and the pre-controlled potential emissions for the following pollutants: fluorides, hydrogen chloride and sulfuric acid mist. Also, provide the control efficiencies for the add-on control device or devices for each of these pollutants. Please submit the appropriate CAM plan for each of the pollutants that are determined to be subject to CAM.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the responsible official.

REQUEST FOR ADDITIONAL INFORMATION

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We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Bruce Mitchell, at 850/413-9198 or Yousry (Joe) Attalla at (850) 921-9527.

Sincerely,



Jon Holtom P.E.  
Title V Section Administrator  
Bureau of Air Regulation

JKH/bm

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Glenn Ogborn, Bay County Utility Services ([gogborn@baycountyfl.gov](mailto:gogborn@baycountyfl.gov))  
Mr. Richard Brookins, EnGen, LLC ([brookins@engenllc.com](mailto:brookins@engenllc.com))  
Mr. David A. Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))  
Ms. Kathleen Forney, U.S. EPA, Region 4 ([forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov))  
Ms. Heather Abrams, U.S. EPA, Region 4 ([abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov))  
Ms. Ana Oquendo, U.S. EPA, Region 4 ([oquendo.ana@epa.gov](mailto:oquendo.ana@epa.gov))  
Ms. Catherine Collins, Fish and Wildlife Service ([catherine\\_collins@fws.gov](mailto:catherine_collins@fws.gov))  
Mr. Jeff Koerner, P.E., DEP BAR ([jeff.koerner@dep.state.fl.us](mailto:jeff.koerner@dep.state.fl.us))  
Mr. Robert Bull, P.E., DEP BAR ([robert.bull@dep.state.fl.us](mailto:robert.bull@dep.state.fl.us))  
Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Monday, March 29, 2010 3:37 PM  
**To:** 'gogborn@baycountyfl.gov'  
**Cc:** 'brookins@engenc.com'; 'dbuff@golder.com'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; 'catherine\_collins@fws.gov'; Koerner, Jeff; Bull, Robert; Gibson, Victoria; Holtom, Jonathan; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)  
**Attachments:** RAI 0050031-12-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)



## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Monday, March 29, 2010 4:22 PM  
**To:** 'brookinsr@engenllc.com'  
**Subject:** Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)  
**Attachments:** RAI 0050031-12-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Glenn Ogborn [gogborn@baycountyfl.gov]  
**Sent:** Monday, March 29, 2010 3:56 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

This is to verify that I have received the attached document.

Glenn

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**From:** Livingston, Sylvia [Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, March 29, 2010 2:36 PM  
**To:** Glenn Ogborn  
**Cc:** 'brookins@engenllc.com'; 'dbuff@golder.com'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; 'catherine\_collins@fws.gov'; Koerner, Jeff; Bull, Robert; Gibson, Victoria; Holtom, Jonathan; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Please Note: "Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding

## Livingston, Sylvia

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**From:** Richard Brookins [BROOKINSR@engenllc.com]  
**Sent:** Tuesday, March 30, 2010 8:02 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, March 29, 2010 3:22 PM  
**To:** Richard Brookins  
**Subject:** Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

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**From:** Buff, Dave [DBuff@GOLDER.com]  
**To:** Livingston, Sylvia  
**Sent:** Monday, March 29, 2010 3:59 PM  
**Subject:** Read: Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

Your message was read on Monday, March 29, 2010 3:59:12 PM (GMT-05:00) Eastern Time (US & Canada).

## Livingston, Sylvia

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**From:** Holtom, Jonathan  
**Sent:** Monday, March 29, 2010 4:10 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

It looks like it should be [brookinsr@engenllc.com](mailto:brookinsr@engenllc.com). We were missing the "r" after brookins.

Jon

---

**From:** Livingston, Sylvia  
**Sent:** Monday, March 29, 2010 3:40 PM  
**To:** Holtom, Jonathan  
**Subject:** FW: Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

Jon,

I received this back from Richard Brookins. Do you have another email address for him?

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

---

**From:** Microsoft Exchange  
**Sent:** Monday, March 29, 2010 3:37 PM  
**To:** Livingston, Sylvia  
**Subject:** Undeliverable: Request for Additional Information: Bay County Utility Services - Bay County Resource Recovery Facility (0050031-012-AC)

### Delivery has failed to these recipients or distribution lists:

'[brookinsr@engenllc.com](mailto:brookinsr@engenllc.com)'

The recipient's e-mail address was not found in the recipient's e-mail system. Microsoft Exchange will not try to redeliver this message for you. Please check the e-mail address and try resending this message, or provide the following diagnostic text to your system administrator.

The following organization rejected your message: MailServer.merrick-inc.com.



July 13, 2010

093-87678

Jon Holtom, P.E., Title V Section Administrator  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED  
JUL 14 2010  
BUREAU OF  
AIR REGULATION

RE: **BAY COUNTY RESOURCE RECOVERY FACILITY  
DRAFT PERMIT NO. 0050031-012-AC  
COMMENTS ON DRAFT PERMIT**

Dear Mr. Holtom:

Bay County Utility Services (Bay County) has received the Florida Department of Environmental Protection's (FDEP's) draft air construction permit no. 0050031-012-AC dated June 22, 2010, regarding the rerate of Units 1 and 2. On behalf of Bay County, Golder Associates Inc. is submitting the following comments regarding the draft air construction permit.

## Section 2. EMISSIONS UNITS SPECIFIC CONDITIONS (DRAFT)

Section numbering - this section should be entitled 'Section 3'.

Condition 2, Rerating Capacity, page 5 of 8: This condition limits the steam flow rate from each unit to 69,333 lb/hr (4-hour block average) and 68,000 lb/hr (24-hour rolling average). The 4-hour steam flow rate limit represents a 4-percent increase over the 24-hour steam flow rate. In its application, Bay County had requested a 1-hour maximum steam rate of 74,800 lb/hr, based on 110 percent of the 24-hour steam rate. There does not appear to be any regulatory requirement to limit the 1-hour or 4-hour steam flow rate of the units. The rationale for the 4-hour limit appears to be solely the increase in municipal solid waste (MSW) burning capacity of the units ( $255 \text{ TPD} / 245 \text{ TPD} = 1.04$ ). However, steam flow can vary hour to hour, and in order for the units to fully realize their newly permitted capacities, a short-term allowance of 10 percent above the 24-hour steam rate is necessary. Bay County is willing to accept the 74,800-lb/hr steam flow limit as a 4-hour average, as the Department has proposed.

Subpart Cb sets forth the following requirements for operating practices:

§ 60.53b Standards for municipal waste combustor operating practices.

(b) No owner or operator of an affected facility shall cause such facility to operate at a load level greater than 110 percent of the maximum demonstrated municipal waste combustor unit load as defined in §60.51b, except as specified in paragraphs (b)(1) and (b)(2) of this section.

§ 60.51b, Definitions, provides the following:

Maximum demonstrated municipal waste combustor unit load means the highest 4-hour arithmetic average municipal waste combustor unit load achieved during four consecutive hours during the most recent dioxin/furan performance test demonstrating compliance with the applicable limit for municipal waste combustor organics specified under §60.52b(c).



Golder Associates Inc.  
6026 NW 1st Place  
Gainesville, FL 32607 USA

Tel: (352) 336-5600 Fax: (352) 336-6603 www.golder.com



Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America

Therefore, Subpart Cb allows a unit to operate at up to 110 percent of the maximum load demonstrated during the dioxin/furan compliance testing, based on a 4-hour average. Under the Department's draft permit, the Bay County units would not have this opportunity even if the units reached their permitted 24-hour steam rates during the compliance testing. The units would be limited to 104 percent of the demonstrated load.

Bay County's goal, in fact their requirement, is to process the maximum amount of MSW into electricity as possible, while meeting all air pollution and other regulations. This reduces the amount of MSW going into a landfill, conserving landfill space, while generating electricity from renewable resources.

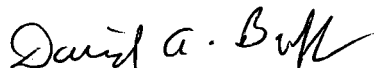
We have also reviewed the permit conditions regarding steam production for the waste-to-energy (WTE) facilities located throughout Florida. This review, provided in the attached table, shows almost all WTE facilities in the state have 4-hour steam limits that are greater than 104 percent of the 24-hour steam limit or design rate. All units throughout the state have 4-hour steam rates ranging from 108 to 115 percent of their 24-hour or daily design rate. Most have 4-hour rates based on 115 percent of the daily rate. Bay County should not be treated any differently than these other facilities.

We therefore, respectfully request that the 4-hour steam limitation in the draft permit be changed to 78,000 lb/hr, as requested in the application.

Thank you for consideration of this comment. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

**GOLDER ASSOCIATES INC.**



David A. Buff, P.E., Q.E.P.  
Principal Engineer

cc: Glenn Ogborn, Bay County  
Richard Brookins, BCWTE

Enclosures

DB/nav

**FLORIDA'S WASTE-TO-ENERGY FACILITIES  
STEAM GENERATION LIMITS**

Facility ID No.	Name Facility	Design Rate Capacity			Permitted Capacity				
		Daily (per Unit)			Short Term (per Unit)				
		MSW Throughput (TPD)	Heat Input (MMBtu/hr)	Steam Rate (lb/hr)	Averaging Time (hrs)	MSW Throughput (TPD)	Heat Input (MMBtu/hr)	Steam Rate (lb/hr)	Percent of Rated Capacity
0112120	North Broward County	747 <sup>a</sup>	280 <sup>a</sup>	--	4	807	302.5	186,000	108
0112119	South Broward County	750 <sup>a</sup>	281 <sup>a</sup>	--	4	863	323.6	192,000	115
0250348	Miami-Dade County	648	--	180,000	4	--	--	--	110
0570261	Hillsborough County	400 <sup>a</sup>	150 <sup>a</sup>	94,270 <sup>a</sup>	4	460	172.5	102,000	115
0690046	Lake County	250	104	60,200	4	288	120	69,000	115
0570127	McKay Bay	250	104	--	4	288	120	79,300	115
0990234	Palm Beach/North County	--	--	--	4	900	412.5	324,000	--
1010056	Pasco County	350	140	--	--	--	--	103,850	114
1030117	Pinellas County	1,000 <sup>a</sup>	417 <sup>a</sup>	250,000 <sup>a</sup>	4	1,100	458	275,000	110
0710119	Lee County	660	275	186,200	--	--	--	--	--
		660	291.5	197,400	--	--	--	--	--

<sup>a</sup> The daily capacity rates of these facilities are not limits in the permits but nominal design rate capacities.