



Camp Dresser & McKee Inc.

1/11/01 cc: EdSucc

consulting
engineering
construction
operations

Westshore Center
1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
Tel: 813 281-2900 Fax: 813 288-8787

January 3, 2001

RECEIVED
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BUREAU OF AIR REGULATION

Mr. Scott Sheplak, P.E.
Title V Administrator
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Subject: McKay Bay Draft Title V Permit No. 050127-001-AV Application Modification

Dear Mr. Sheplak:

The purpose of this letter is to amend the City of Tampa's Title V Application for its McKay Bay Refuse-to-Energy Facility and provide comments on the draft Title V Permit.

Amendment Request

In keeping with the Department's guidance, the City wishes to amend Section 2 of Appendix A, "Precautions to Prevent Emissions of Unconfined Particulate Matter." The last bullet in that section states "the ash hauling trucks are equipped with tarps and subject to a wheel wash prior to leaving the site." The City of Tampa wishes to amend that statement to "The ash hauling trucks are equipped with tarps." The new ash handling facilities have been constructed without wheel wash facilities.

Draft Permit Comments

1. The emission units addressed in Subsections A and B have all been demolished. The City requests that these Subsections be deleted.
2. Section III, Subsection D, Condition D.9: Requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. This source is the ash handling building and system. No "maximum operation rate" for this particular source was requested or is specified in either the PSD or Title V application. As a practical matter, the system is either on or off. If an operation rate must be specified, this Condition should specify that "testing shall be conducted with all four combustion units running."
3. Section III, Subsection D, Condition D.11: This Condition is linked to Condition D9 and requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit.

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The applicable emission-limiting standard for this source is in units of percent opacity. Process weight input or heat input data are not appropriate or needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. This Condition should be deleted.

4. Section III, Subsection D, Condition D.14: Imposes the excess emissions and monitoring systems performance reporting requirements of 40 CFR 60.7. This particular emissions unit is not continuously monitored. Therefore, there would never be anything to report. Consequently, the City requests that this requirement be deleted.
5. Section III, Subsection E, Condition E.9: These sources are the two lime storage silos. This Condition requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. No maximum operation rate was specified in either the PSD Permit or the Title V Application. The City requests that the language in this Condition be changed to specify that "testing of emissions shall be conducted while pneumatically loading the silos at the normal operational loading rate."
6. Section III, Subsection E, Condition E.12: Requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit. The applicable emission-limiting standard is in units of percent opacity. Process weight input or heat input data are not appropriate or needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. The City requests that this Condition be deleted. As a practical matter, the operator has a financial incentive (e.g. saving the cost of the product and avoiding downtime due to clogging of the pneumatic conveyance system) to operate this equipment in a normal operational manner which serves to limit the capacity of the silo loading system.
7. Section III, Subsection F, Condition F.9: These sources are the two carbon storage silos. This Condition requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. No "maximum operation rate" for this particular source was specified in the PSD Permit or requested in the Title V Application. The City requests that the language in this Condition be changed to specify that "testing of emissions shall be conducted while pneumatically loading the silos at the normal operational loading rate."
8. Section III, Subsection F, Condition F.12: Requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit. The applicable emission-limiting standard is in units of percent opacity. Process weight input or heat input data are not needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. The City requests that this Condition be deleted. As a practical matter, the operator has a financial incentive (e.g. saving the cost of the product and avoiding downtime due to clogging of the pneumatic conveyance system) to operate this equipment in a normal operational matter which serves to limit the capacity of the silo loading system.

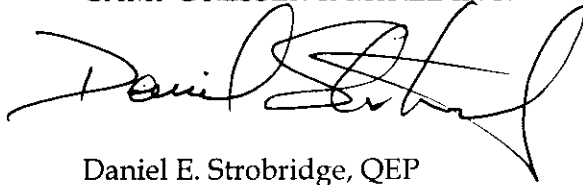
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Attached are the following:

- A revised Section 2 Appendix A,
- An Engineer's Certification,
- A Responsible Official Certification, and
- A letter designating Nancy McCann as the Responsible Official.

Very truly yours,

CAMP DRESSER & MCKEE INC.

A handwritten signature in black ink, appearing to read "Daniel E. Strobridge". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Daniel E. Strobridge, QEP
Vice President

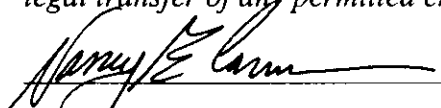
c: D. Dee
G. Grotecloss
J. Gorrie

Precautions to Prevent Emissions of Unconfined Particulate Matter

Precautions include the following:

- Roads, parking areas, and yards are paved.
- A street sweeper equipped with a vacuum system is used to remove particulate matter from roads and other paved areas.
- The unpaved areas of the facility are maintained and either sodded or landscaped.
- The boiler ash and grate siftings are quenched and wetted.
- The flyash is wetted in a pugmill ash conditioning system and then blended with the wet boiler ash and grate siftings.
- The wetted combined ash is processed for recyclable ferrous metals and stored in a building prior to loading into a truck for disposal.
- The ash hauling trucks are equipped with tarps.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Nancy McCann
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: City of Tampa Street Address: 306 E. Jackson Street City Hall Plaza 5N City: Tampa State: Florida Zip Code: 33602
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (813) 274-8090 Fax: (813) 274-8035
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature _____ Date <u>1/8/01</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Jason Gorrie Registration Number: 55341
2. Professional Engineer Mailing Address: Organization/Firm: Camp Dresser & McKee Inc. Street Address: 1715 N. Westshore Boulevard/Suite 875 City: Tampa State: Florida Zip Code: 33607
3. Professional Engineer Telephone Numbers: Telephone: (813) 281-2900 Fax: (813) 288-8787

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

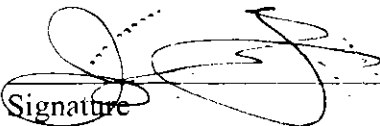
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(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.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], 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 schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], 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.

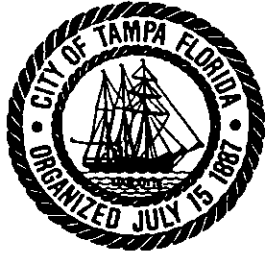
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such 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.


Signature

1/8/01
Date

(seal)

* Attach any exception to certification statement.



CITY OF TAMPA

Dick A. Greco, Mayor

November 4, 1997

NOV - 4 1997

Dr. Rick Garrity
Department of Environmental Protection of Hillsborough County
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Dr. Garrity:

Please accept this letter as authorization for Nancy McCann, Urban Environmental Coordinator for the City of Tampa's Solid Waste Department to sign permit applications and other related documents pertaining to the McKay Bay Refuse-to-Energy Complex. Ms. McCann is the City's authorized representative for dealing with regulatory agencies on issues concerning the McKay Bay Refuse-to-Energy Complex.

Please contact Ms. McCann if any additional documentation is required. She can be reached at (813)274-8090.

Sincerely,

Dick A. Greco
Mayor

cc: Sam Halter, Chief Administrative Officer
Mike Salmon, Environmental Services/Public Works Projects Coordinator
Wayne Brookins, Director, Solid Waste Department
Nancy McCann, Urban Environmental Coordinator