

July 15, 2009

**RECEIVED**

JUL 16 2009

Mr. Scott Sheplak  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 32399

**BUREAU OF AIR REGULATION**

**Re: Additional Information for the Proposed Non Ferrous Metals Recovery System Installation  
McKay Bay Refuse-to-Energy Facility  
107 North 34<sup>th</sup> Street  
Tampa, Florida 33605  
FDEP Facility ID #0570127**

Dear Mr. Sheplak:

As indicated in our previous notification letter dated June 4, 2009 to the Florida Department of Environmental Protection (FDEP) and the Environmental Protection Commission of Hillsborough County (EPC), the City of Tampa is planning the enhancement of its existing resource recovery capabilities and recycling program via the addition of a Non-Ferrous Metals Recovery System (NFMRS) inside the McKay Bay Refuse-to-Energy Facility's permitted, fully-enclosed, Ash Management Building and Handling System. As discussed during your telephone conversations this week with Tamara Stankunas, Earthshine Environmental, Inc, this letter is intended to notify the FDEP that the proposed NFMRS meets the criteria of an "Insignificant Emissions Unit or Pollutant-Emitting Activity", as per Rule 62-213.430(6)(b). Similar Title V facilities (e.g. Palm Beach County NCRRF) in Florida include their ash management buildings and ferrous and non-ferrous metals recovery systems within their Title V Air Operations Permit as "Insignificant Activities". Additionally, operational information regarding similar systems has shown that potential emissions related to the NFMRS are less than the "significance threshold", as per 62-213.430.

As stated in our previous notification letter, the McKay Bay Refuse-to-Energy Facility (Facility) operates in compliance with its Title V Air Operations Permit (Permit # 0570127-005) and PSD-FL-086. The Ash Management Building and Scalper Buildings are equipped with hoods, associated ductwork, and a wet scrubber. The entire ash handling operation is within the fully-enclosed buildings and the process is designed and functions to keep the ash continually moist throughout the handling process. Historical VE testing results for the Ash Management Building and Handling System have indicated zero visible emissions for each of the test observation points.

The Ash Management Building and Handling System, which was constructed as part of the Facility's permitted retrofit project (completed in 2000), was designed to accommodate for the future installation of a NFMRS. A designated Non-Ferrous Bunker was installed inside the building during the original construction. The Ash Management Building and Handling System has always been equipped with two wet scrubbers, as was stated in the Facility's Title V Renewal Application dated December 27, 2005. It has recently been brought to our attention that the current Title V Permit for the Facility contains an administrative error, incorrectly stating that the Ash Management Building and Handling System is equipped with a baghouse. A request for correction of the administrative error will be provided to your office under separate cover.

The City would greatly appreciate the FDEP's prompt review and written approval of our NFMRS installation. The City's goal is to commence with the system installation by the end of July. If you have any questions or need additional information, please contact Tamara Stankunas or me at (239) 332-1300.

Sincerely,



cc: Jonathan Holtam, FDEP  
Diana Lee, HCEPC  
Cindy Zhang-Torres, FDEP SW District  
Nancy McCann, City of Tampa  
Greig Grotecloss, City of Tampa  
Tamara Stankunas, Earthshine Environmental, Inc.  
Sherman Patton, Malcolm Pirnie, Inc.  
Thomas White, Wheelabrator McKay Bay, Inc.

**Sheplak, Scott**

-f/r-

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**From:** Sheplak, Scott  
**Sent:** Monday, July 13, 2009 5:46 PM  
**To:** Holtom, Jonathan  
**Subject:** non ferrous metals recovery system

The proposed non ferrous metals recovery system within the ash mgmnt building/handling system that has ventilation hoods, ductwork and a wet scrubber seems to qualify as "insignificant." The P.E. claims there will be no emissions increase. We have treated this type of activity as being insignificant at other W-T-E facilities. In my opinion, all they need to do is submit a claim by a Florida P.E. that the proposed activity in fact qualifies as insignificant meeting the criteria of Rule 62-213.430(6)(b), F.A.C. I do not believe there are any unit-specific applicable requirements for this type of activity/emissions unit.

I do not think it will be easy to find emission factors to try to come up with an emissions estimate from something like this. I expect emissions to be extremely low due to this type of operation.

I spoke with Tamara Stankunas this p.m. about this.

Scott M. Sheplak, P.E.

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**From:** Holtom, Jonathan  
**Sent:** Friday, July 10, 2009 5:48 PM  
**To:** Sheplak, Scott  
**Subject:**

Scott,

Please look over the information contained in these emails and let me and/or Diana know if you think they can make this change under their Title V permit or if an AC is needed. We may need to consult with Jeff to see what thinks about an AC.

Jon Holtom, P.E., CPM  
Title V Program Administrator  
Bureau of Air Regulation  
(850) 921-9531

7/13/2009

## Sheplak, Scott

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**From:** Holtom, Jonathan  
**Sent:** Monday, July 20, 2009 12:02 PM  
**To:** Walker, Elizabeth (AIR); Sheplak, Scott; Friday, Barbara  
**Subject:** RE: McKay Bay Request

Elizabeth,

Scott is reviewing a request from McKay regarding a possible insignificant emissions unit addition. This information should be an addendum to that request, so please make sure Scott gets a copy of the signed document. Thanks!

Jon Holtom, P.E., CPM  
Title V Program Administrator  
Bureau of Air Regulation  
(850) 921-9531

-----Original Message-----

**From:** Walker, Elizabeth (AIR)  
**Sent:** Monday, July 20, 2009 11:59 AM  
**To:** Sheplak, Scott; Holtom, Jonathan; Friday, Barbara  
**Subject:** FW: McKay Bay Request

This is a scanned version of correspondence sent by Malcolm Pirnie regarding what looks like insignificant activities. Did I already distribute copies of this? Is it definitely regarding insignificant activities. We may have been sent more than one copy, since it was for Scott but Jonathan was copied.

Sorry - I'm losing track of things. That's not good!

Elizabeth Walker  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

-----Original Message-----

**From:** digital sender  
**Sent:** Monday, July 20, 2009 11:50 AM  
**To:** Walker, Elizabeth (AIR)  
**Subject:**

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device.

**Sheplak, Scott**

-file-

**From:** Sheplak, Scott  
**Sent:** Wednesday, July 29, 2009 9:13 AM  
**To:** 'Tamara L. Stankunas'  
**Subject:** RE: City of Tampa McKay Bay Refuse to Energy Facility planned NFMRS installation

0570127-005-AV

I have received and reviewed the request. Based on what was provided, the proposed activity qualifies as an "insignificant activity."

If you should have any questions, please contact me.

Sincerely,

Scott M. Sheplak, P.E.  
DEP - Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399

[Scott.Sheplak@dep.state.fl.us](mailto:Scott.Sheplak@dep.state.fl.us)

Telephone 850/921-9532  
Fax 850/921-9533

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**From:** Tamara L. Stankunas [mailto:tstankunas@earthshineinc.com]  
**Sent:** Wednesday, July 29, 2009 7:38 AM  
**To:** Sheplak, Scott  
**Subject:** City of Tampa McKay Bay Refuse to Energy Facility planned NFMRS installation

Good Morning Scott,

I am emailing to inquire if you received our July 15, 2009 letter regarding the City's planned installation of a non ferrous metals recovery system at the reference facility? Please let us know if you require any additional information to assist with your review.

Thank you,

Tammy



**Tamara L. Stankunas, P.G.**  
**President**  
19046 Bruce B. Downs Blvd., #237  
Tampa, FL 33647  
813-929-1605 office  
813-545-7067 mobile  
813-441-6911 fax