



E. ROBERTS

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February 4, 1982

Water Resources and Public Works
City of Tampa
City Hall Plaza - Eighth Floor, North
Tampa, Fl. 33602

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REGISTRY

Attention: Mr. Dale Twachtman, Administrator

Subject: MCKAY BAY REFUSE-TO-ENERGY PROJECT
AIR QUALITY PERMITTING - WHI COMMENTS

Dear Mr. Twachtman:

Waste Management, Inc. has reviewed the Preliminary Determination package received at our February 1st, 1982 meeting. We have requested some additional documentation (including the original permit applications), in order to complete our evaluation. However, at this point due to the relatively short period remaining in the final approval cycle, we feel that we must go on record with respect to the following items:

1. The emission limitations imposed by the Preliminary Determination differ significantly from the best estimates offered by WHI in our October 12th, 1981 and December 21st, 1981 proposals.

The following table indicates the variances for Facility 1:

Pollutant	Permit Limitations		WHI Proposal Form 9	
	Maximum Hourly Rate (lb./hr.)	Maximum Annual Rate (TPY)	Best Estimate (@ 1000 TPD) lb./hr.	Range (@ 1000 TPD) lb./hr.
Particulate	30.4	133.3	20.83	16.0-25.0 ^{23.6}
Sulfur Dioxide	165.1	722.0	145.8	120-170 ^{21.9}
Nitrogen Oxides	706.4	903.0	258.3	210-300 ⁴¹⁰
Carbon Monoxide	13.3	58.0	16.6	12.5-17.0 ^{16.2}
VOC	7.3	32.0	8.33	- ^{4.5}
Lead	3.1 ⁴	13.6	N.A.	-
Mercury (Vaporous)	0.4	1.8	N.A.	-