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FIRST FLORIDA BANK BUILDING
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(904) 224-1585

FLORIDA NATIONAL BANK TOWER
P. O. BOX 4700
JACKSONVILLE, FLORIDA 32201
(904) 354-1600

RECEIVED

PLEASE REPLY TO:

October 14, 1987

OCT 15 1987

Tallahassee

FEDERAL EXPRESS

Daryl Smith, Director
Hillsborough County Department
of Solid Waste
925 E. Twiggs Street
Tampa, Florida 33601

BY SOLID WASTE DEPARTMENT

RE: PSD Permit for Hillsborough County
resource recovery facility

Dear Mr. Smith:

Enclosed is a copy of the PSD permit signed by Secretary Twachtmann of the Department of Environmental Regulation.

Please call if you have any questions.

Sincerely,

Vickie Cantley

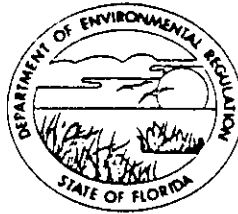
Vickie Cantley
Secretary to David Dee

cc: Dan Strobridge (w/attachment) FEDERAL EXPRESS
Bob Hauser (w/attachment)
Joe Treshler (w/attachment)
Bill Gillen (w/attachment)
Joe Mount (w/attachment)
Emmy Acton (w/attachment)
Tom Smith (w/attachment)
Don Elias (w/attachment)
Al Phillips (w/attachment)

/vc:Smith-10

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Richard W. Seelinger
Executive Vice President
Ogden Martin Systems of
Hillsborough County, Inc.
40 Lane Road, CN 2615
Fairfield, New Jersey 07007-2615

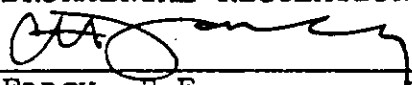
October 14, 1987

Enclosed is permit No. PSD-FL-121 for the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site in Hillsborough County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

Copy furnished to:

Louis Tortora, Jr., P.E.
Bill Thomas, SW Dist.
Wayne Aronson, EPA

Miguel Flores, NPS
Jerry Campbell, P.E., EPCHC
Sandra Freedman, Mayor of Tampa

Pam Iorio, County Commissioner
Protecting Florida and Your Quality of Life

PS Form 3811, July 1983 (47-945)

SENDER: Complete items 1, 2, 3 and 4.
 Put your address in the RETURN TO space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to: **Richard W. Seelinger**
Ogden Martin Sys. of Hills, Co., Inc.
40 Lane Road, CN 2615
Fairfield, NJ 07007-2615

4. Type of Service:
 Registered Insured
 Certified COD
 Express Mail

Article Number:
P 274-007-666

Always obtain signature of addressee or agent and
DATE DELIVERED

5. Signature - Addressee
 [Signature]

6. Signature - Agent

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

P 274 007 666

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Richard W. Seelinger
Ogden Martin Sys. of Hills.
 Street and No
40 Lane Road, CN 2615
 P. O., State and ZIP Code
Fairfield, NJ 07007-2615

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom Date and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date
 Mailed: 10/14/87
 Fed. Permit: PSD-FL-121

* U.S.G.P.O. 1985-480-794
 PS Form 3800, June 1985

Final Determination

Hillsborough County, Florida

Resource Recovery Facility Modification
File No. PSD-FL-121

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

October 14, 1987

Final Determination

The application by Hillsborough County, through Ogden Martin Systems of Hillsborough, Inc., to increase the allowable nitrogen oxides (NOx) and sulfuric acid mist (acid mist) emissions at the Resource Recovery Facility in Hillsborough County (HCERF), has been reviewed by the Bureau of Air Quality Management. Public Notice of the Department's Intent to Issue the permit was published in the Tampa Tribune on July 19, 1987.

Comments were received from Bruce Miller, U.S. EPA Region IV; David Dee, attorney for Hillsborough County; and Mr. J. R. Treshler of Ogden Projects, Inc. Although the Department acknowledges that comments concerning the Preliminary Determination help state some issues more clearly, responses will be limited to comments pertaining to the proposed permit. Responses to the comments received are addressed below, on a letter by letter basis.

Letter 1, Hillsborough County (attachment 4)

Comment 6, page 2: Attachment 4 should convey to the County what EPA's view is on the Department's permit processing approach.

Comment 1, page 3: Several specific conditions were repeated from the original permit, PSD-FL-104, in order to maintain continuity on issues pertaining to NOx and acid mist in the proposed permit, PSD-FL-121.

Comments 2, 3, 4, 5, and 6; pages 3 and 4: The Department will make changes in the permit to reflect agreement with these comments.

Letter 2, Ogden Projects (attachment 5)

Comment 1, page 3: The emission increases of NOx, acid mist and particulates are addressed together in the permit overview because they are in the same facility and covered under the same permit.

Comment 2, page 3: The Department will make a change in the permit to make clear the fact that emission limits and compliance testing for acid mist have been deleted in the proposed permit.

Letter 3, U.S. EPA (attachment 6)

The Department agrees with EPA's comments that the proposed permit should state how permit PSD-FL-121 supercedes permit PSD-FL-104 on emission limits for NOx and acid mist. A paragraph will be added to the permit to that effect.

Letter 4, U.S. Department of the Interior (attachment 7)

The Department of the Interior's comment arrived after the closing date of the comment period, however, with the permission of the applicant, DER has reviewed the comment as a courtesy.

DER does not feel that the proposed NOx emission rate of the Hillsborough County RRF shall be compared to other facilities in the State of Florida which incorporate a different type of technology than the Hillsborough facility. In addition, DER is not supportive of setting an emissions limitation which is equivalent to any one test result.

Letter 5, Hillsborough County Environmental Protection Commission (attachment 8)

The Hillsborough County Environmental Protection Commission's comment arrived after the closing date of the comment period. Upon discussing the situation with the applicant, the Department has decided to not include these comments as part of the Final Determination, but will address the comments at a later date by means of a letter.

Listed below are the changes the Department will make in the proposed permit to reflect consideration of the comments received from all the parties, as mentioned earlier.

Changes in Paragraph 2, page 1 of the permit

From:

For the modification of a 1,200 ton per day resource recovery facility to be located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the proposed plant are 368.2 km E and 3092.7 km N.

To:

For the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 km E and 3092.7 km N.

Change in Paragraph 3, page 1 of the permit

From:

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from

this modification. Only specific conditions 1.a.(3), 1.b., and 1.c.(1) have been modified and/or added to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104). The other pollutants emitted from this facility are addressed in the original PSD permit.

To:

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from this modification. Only specific condition 1. has been modified to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104) and also Specific Condition No. 11 has been added. The other pollutants emitted from this facility are addressed in the original PSD permit. This facility is not subject to any emission limitations or testing requirements for sulfuric acid mist. Except as expressly provided in the specific conditions contained herein, all of the other provisions of permit No. PSD-FL-104 remain in effect.

Changes in General Condition No. 13

From:

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

To:

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

Changes in Specific Conditions No. 1.a.(4)

From:

(4) Each of the emission limits in conditions (1) through (3) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (2) and (3) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.

To:

(4) Each of the emission limits in conditions (1) and (3) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (1) and (3) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.

Addition to Specific Condition 1.a.

(7) This facility is not subject to any emission limitations or testing requirements for sulfuric acid mist.

Change in Specific Condition 1.c.(2)g

From:

g. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.

To:

g. Method 7E for concentration of nitrogen oxides.

Add Specific Condition No. 11

11. This permit shall supercede the NOx and acid mist emission limitations and testing requirements as contained in permit PSD-FL-104.

Attachments to be Added:

4. Letter from David Dee, attorney for Hillsborough County, dated August 10, 1987.
5. Letter from Ogden Projects, dated August 14, 1987.
6. Letter from U.S. EPA dated September 11, 1987.
7. Letter from U.S. Department of the Interior, dated September 22, 1987.
8. Letter from Hillsborough County Environmental Protection Commission, dated October 2, 1987.

The final action of the Department will be to issue the permit as proposed in the Preliminary Determination with the above mentioned ammendments.

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough

Before the undersigned authority personally appeared G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of STATE OF FLORIDA DEPARTMENT OF PROPOSED AGENCY ACTION ON PERMIT APPLICATION

was published in said newspaper in the issues of JULY 19, 1987

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa, in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 19th day of JULY, A.D. 1987

Leslie K. Puatta

Notary Public, State of Florida

My Commission Expires Nov. 23, 1990

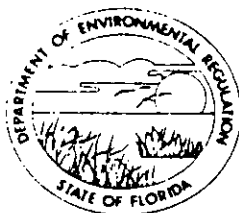
Bonded thru Toy Fair - Insurance Inc.

(SEAL)

Notice of Proposed Agency Action... After the proposed agency... The Department of Environmental Regulation... Hillsborough County... increase the proposed nitrogen oxides, sulfuric acid mist, and particulate emissions from their existing... This application was reviewed under Florida Administrative Code Rules 17-2.500, Prevention of Significant Deterioration, Emissions of Nitrogen Oxides, Sulfuric Acid Mist, and Particulates will increase by 739,289, and 7 tons per year, respectively... Persons whose substantial interests are affected by the department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes... If a petition is filed, the administrative hearing process is designed to formulate agency action... Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes... Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32399-2400... Hillsborough County Environmental Protection Commission, 1410 N. 21st Street, Tampa, Florida 33605

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE:
Hillsborough County
Hillsborough County Courthouse
419 Pierce Street
Tampa, Florida 33602

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988
County: Hillsborough
Latitude/Longitude: 27° 57' 00" N
82° 40' 22" W
Project: Hillsborough County
Resource Recovery Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 km E and 3092.7 km N.

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from this modification. Only Specific Condition No. 1 has been modified to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104) and also Specific Condition No. 11 has been added. The other pollutants emitted from this facility are addressed in the original PSD permit. This facility is not subject to any emission limitations or testing requirements for sulfuric acid mist. Except as expressly provided in the Specific Conditions contained herein, all of the other provisions of permit No. PSD-FL-104 remain in effect.

Attachments:

1. May 1, 1987, letter by Richard W. Seelinger.
2. June 8, 1987, letter by Bruce P. Miller, EPA Region IV.
3. June 12, 1987, letter by J. R. Treshler.
4. Letter from David Dee, attorney for Hillsborough County dated August 10, 1987.
5. Letter from Ogden Projects, dated August 14, 1987.

PERMITTEE:
Hillsborough County

Permit Number: AC PSD-FL-121
Expiration Date: March 31, 1988

6. Letter from U.S. EPA dated September 11, 1987.
7. Letter from U.S. Department of the Interior, dated September 22, 1987.
8. Letter from Hillsborough County Environmental Protection Commission, dated October 2, 1987.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
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GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Emission Limitations

- a. Stack emissions from each unit shall not exceed the following:
- (1) Particulate matter: 0.021 grains per dry standard cubic foot corrected to 12% CO₂ (gr/dscf-12%) or 7.0 pounds per hour per unit, whichever is more restrictive.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
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SPECIFIC CONDITIONS:

- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity except that 20% opacity may be allowed for one six-minute period (average of 24 consecutive observations recorded at 15-second intervals) in any one hour. Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by DER for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited. Opacity of other emission points at the plant shall not exceed 5%.

- (3) Nitrogen Oxides: 0.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive
- (4) Each of the emission limits in conditions (1) and (3) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (1) and (3) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e. dscf per ton of refuse fired, are different than projected by the applicant, DER may, at its discretion, determine compliance based upon the lb/ton limits.
- (5) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121.
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SPECIFIC CONDITIONS:

Additionally, all portions of the proposed facility including the ash handling facility which have the potential for fugitive emissions will be enclosed. Also those areas which have to be open for operational purposes, e.g., tipping floor of the refuse bunker while trunks are entering and leaving, will be under negative air pressure.

- (6) Each of the three units is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards (NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.
 - b. Ash handling facility emissions shall not exceed 1.63 pounds per hour.
 - c. Compliance Tests
 - (1) Compliance tests for particulate matter, and, nitrogen oxides shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f), except that an annual test will be conducted for particulate matter. Compliance tests for opacity will be conducted simultaneously with compliance tests for particulate matter. The compliance test requirements for the ash handling facility shall be waived in accordance with Rule 17-2.700(3)(d), FAC.

Compliance tests shall be conducted for such time and under such conditions as specified by EPA prior to the compliance test. These conditions will be specified by DER upon notification of performance tests as required by General Condition 1. The permittee shall make available to DER such records as may be necessary to determine the conditions of the performance tests.
 - (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:
 - a. Method 1 for selection of sample site and sample traverses.

PERMITTEE:
Hillsborough County

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SPECIFIC CONDITIONS:

- b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.
 - e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 7E for concentration of nitrogen oxides.
- (3) The stack tests shall be performed at +10% of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.
- 2. The height of the boiler exhaust stack shall not be less than 220 feet above ground level at the base of the stack.
 - 3. The boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.
 - 4. The boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
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SPECIFIC CONDITIONS:

5. Grease, scum, grit screenings or sewage sludge shall not be charged into the solid waste to energy facility boilers.

6. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to limit particulate emissions to no more than 0.021 grains per dscf corrected to 12% CO₂.

7. Stack Monitoring Program

The permittee shall install and operate continuous monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Rule 17- 2.710, FAC, 40 CFR Part 60, Subparts A and D, Sections 60.13 and 60.45 respectively, except that emission rates shall be calculated in units consistent with emission limits in this permit. The conversion procedure shall be approved by DER.

8. Reporting

a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office, the Hillsborough County Environmental Protection Commission (HCEPC) and EPA Region IV.

b. Stack monitoring shall be reported to HCEPC, the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

9. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.

PERMITTEE:
Hillsborough County

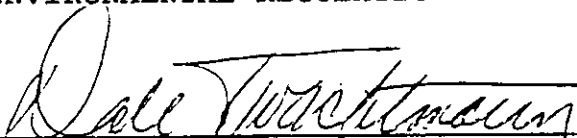
Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

10. This permit shall supercede the NOx and acid mist emission limitations and testing requirements as contained in permit PSD-FL-104.

Issued this 14 day of Oct., 1987

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



Dale Twachtmann, Secretary

ATTACHMENT 4

CARLTON, FIELDS, WARD, EMMANUEL, SMITH, CUTLER & KENT, P. A.

ATTORNEYS AT LAW

ONE HARBOUR PLACE
P. O. BOX 3239
TAMPA, FLORIDA 33601
(813) 223-7000

CNA BUILDING
P. O. BOX 1171
ORLANDO, FLORIDA 32802
(305) 849-0300

200 EAST GOVERNMENT ST.
P. O. BOX 12426
PENSACOLA, FLORIDA 32562
(904) 434-0142

FIRST FLORIDA BANK BUILDING
P. O. DRAWER 190
TALLAHASSEE, FLORIDA 32302
(904) 224-1585

FLORIDA NATIONAL BANK TOWER
P. O. BOX 4700
JACKSONVILLE, FLORIDA 32201
(904) 354-1600

DER

AUG 11 1987

BAQM

PLEASE REPLY TO:

August 10, 1987

Tallahassee

Clair H. Fancy
Deputy Chief
Bureau of Air Quality Management
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Hillsborough County resource recovery facility;
DER File No. PSD-FL-121

Dear Mr. Fancy:

This law firm represents Hillsborough County in the above-referenced case. On behalf of Hillsborough County, we are submitting the following comments concerning the Intent to Issue, Technical Evaluation, Preliminary Determination and draft permit issued by the Department of Environmental Regulation (DER) on July 14, 1987.

For the purposes of this submittal, words which have been underlined should be added to the draft document. Words which have been stricken should be deleted.

Intent to Issue

Page 1, paragraph 2, should state that the County applied for a permit modification for "particulate emissions from the existing refuse to energy facility"

Technical Evaluation and Preliminary Determination

1. Page 1, paragraph 1. Hillsborough County believes that its first PSD permit was properly issued pursuant to the Florida Electrical Power Plant Siting Act. The County does not agree

Clair Fancy
August 10, 1987
Page Two

with the statements in the Preliminary Determination which suggest that the Florida PSD regulations, State Implementation Plan, Power Plant Siting Act, or original Hillsborough County PSD permit were not valid.

2. Page 1, paragraph 1. For purposes of completeness, the Preliminary Determination should discuss the PSD permit (PSD-FL-104) that was issued by the United States Environmental Protection Agency (EPA). Specifically, a preliminary determination was prepared and public comments were solicited by DER on April 6, 1986. DER issued a final determination and recommended issuance of the permit on May 21, 1986. A second PSD permit (PSD-FL-104) for the County's facility was issued by EPA on July 7, 1986.

3. Page 2, paragraph 1. The Preliminary Determination should state that the resource recovery facility has been built. It is no longer a "proposed" project.

4. Page 2, paragraph 2. The Preliminary Determination should be revised to show that "The ERF is will be located . . ." near Faulkenberg Road. Since the site has been the scene of construction activity for the last 2 ½ years, DER should delete the statement that "[t]he site has been recently used as improved pasture for cattle grazing."

5. Page 2, paragraph 3. "The proposed site of the Hillsborough County ERF" is in an area designated as nonattainment for ozone.

6. Pages 2-3, Section II, Rule Applicability. Hillsborough County has requested modifications to certain permit conditions for the resource recovery facility. In the Preliminary Determination, DER classified the County's request as a major modification to a major source. We are not sure whether EPA will agree with DER's decision. Since we have had problems in the past with EPA's approvals of this project, we would like to ensure that EPA approves the proposed DER procedure and decision in this case. Accordingly, we respectfully request the Department to obtain a letter or other written statement from EPA acknowledging that: (a) DER's characterization of the County's request is appropriate; (b) DER followed the proper procedure when evaluating the County's request; and (c) DER's decision is appropriate. We believe this issue is extremely important because we do not want EPA to subsequently challenge the Department's activities in this case.

Clair Fancy
August 10, 1987
Page Three

7. Page 8, paragraph 3, Modelling Methodology. It should be noted that the prior modelling for the facility utilized a conservative approach. The stack parameters and emission rates were based on a maximum facility capacity of 1,760 tons per day and 100% facility availability. As currently constructed, however, the plant will normally handle approximately 1200 tons per day. In addition, it is generally assumed that resource recovery facilities will only be available approximately 85% of the time.

8. Page 10, paragraph 2. The predicted maximum ambient air quality impact for the proposed emissions of NO_x is 1 ug/m³. The preliminary determination incorrectly states that the impact will be 11 ug/m³.

Draft PSD Permit

1. We are concerned about DER's plan to issue a new permit (PSD-FL-121), rather than modify the existing PSD permit (PSD-FL-104). We believe it would be simpler for DER to issue a permit modification that only addresses the specific changes that will be affected by the Department's proposed action. Accordingly, we believe it is unnecessary for the Department to repeat all of the general conditions and specific conditions that have been incorporated into the draft PSD permit (PSD-FL-121). For ease of reference, we have prepared a draft permit and attached it as Exhibit A.

2. Page 1, paragraph 3. The draft permit should expressly state that the emissions limits and testing protocol for sulfuric acid mist have been deleted. As written, the draft permit appears to include the emission limits and testing methods for sulfuric acid mist.

3. Page 4, paragraph 13. All three of the appropriate spaces should be marked to signify that this permit constitutes a determination of BACT, PSD, and NSPS.

4. Page 6, paragraph (4). This requirement should be modified as follows:

Each of the emission limits in conditions (1) and through (3) is to be expressed as a three hour average . . . The concentration standards in conditions (1) {2} and (3) are included as the primary compliance limit

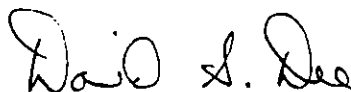
Clair Fancy
August 10, 1987
Page Four

5. Page 7. A new paragraph 1.a.(7) should be added. It should expressly state that the emission limitation for sulfuric acid mist has been deleted.

6. Page 8, paragraph 1.c.(2)g. Method 7E should be used to determine compliance for nitrogen oxides rather than Method 7.

Please feel free to call me if you have any questions.

Sincerely,



David S. Dee

cc: Bill Thomas
Daryl Smith
Joe Mount
Emmy Acton
Richard Seelinger
Bob Hauser
Don Elias
Bill Gillen

DSD/vc:Hills-RR

EXHIBIT A

DRAFT PSD PERMIT MODIFICATION
FOR HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY
(PSD-FL-104)

Page 1, Paragraph 3

This modification to Permit No. PSD-FL-104 addresses the increased emissions of nitrogen oxides and sulfuric acid mist from the stack at the resource recovery facility. It also addresses the particulate emissions from the ash residue facility and dust suppression baghouse. Except as expressly provided in the specific conditions contained herein, all of the other provisions of Permit No. PSD-FL-104 remain in effect.

Specific Conditions

1. Specific Condition 1.a.(5) in Permit No. PSD-FL-104 establishes an emission limitation for nitrogen oxides. It is modified to read as follows:
 - (5) Nitrogen Oxides: 0.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive.


2. Specific Conditions 1.a.(9) and 1.b.(2)i concerning sulfuric acid mist emission limitations and compliance test requirements are deleted.

3. Pursuant to Rule 17-2.700(3)d, FAC, a standard of 5% opacity is hereby set for the minor particulate source control equipment/baghouse (i.e., the ash residue building dust suppression system). The compliance test requirements for the ash handling facility will be waived in accordance with Rule 17-2.700(3)d, FAC.

DSD/vc:Hills-RR2

Copied: CHF/BT

Barry Andrews

} 2/12/87 

ATTACHMENT 5

OGDEN MARTIN SYSTEMS
OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2015
FAIRFIELD, NEW JERSEY 08007-0015
(201) 882-9000



TELECOPIED & SENT FEDERAL EXPRESS

August 14, 1987

HC-0918L
C-1005

DER
AUG 17 1987
BAQM

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
State of Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Permit No. PSD-FL-121
Expiration Date: March 31, 1988
County: Hillsborough
Project: Hillsborough County Resource
Recovery Facility

Dear Mr. Fancy:

Ogden Martin Systems of Hillsborough, Inc. (OMSH) offers the following comments regarding the technical evaluation and preliminary determination in the draft permit to increase the allowable nitrogen oxides, sulfuric acid mist, and particulate emissions from the Resource Recovery Facility in Hillsborough County, Florida. Under Section I, of the Technical Evaluation and Preliminary Determination titled "Introduction," in paragraph two, OMSH would suggest changing the first sentence to read as follows:

On May 1, 1987, Hillsborough County through Ogden Martin Systems of Hillsborough, Inc., applied to DER to increase the allowable nitrogen oxides (NO_x), and sulfuric acid mist emissions at the Hillsborough County ERF.

OMSH would similarly suggest changing the last sentence on the first page to read:

Subsequently, on June 16, 1987, Hillsborough County through Ogden Martin Systems of Hillsborough, Inc., submitted an application to operate/construct dust suppression equipment that was added to the final design of the ash handling building to ensure that there would be no visible emissions from this plant area.

Mr. C. H. Fancy, P.E.
August 14, 1987
Page Two

On the second page of the Introduction, OMSH would suggest deleting paragraph one in its entirety, since the wording is somewhat misleading. The paragraph refers to "the proposed project" whereas the project has been completed. The existing project consists of three boilers. The fourth boiler may or may not be added in the future; but, in any event, it has nothing to do with the original permit or any modification to date. If the paragraph is not deleted in its entirety, it is suggested that the second sentence of the paragraph be changed to read as follows:

A future plant expansion could increase the total solid waste processing capacity of the plant to 1600 TPD.

Under Section IV, captioned "BACT Determination," OMSH would propose changing the second sentence of the first paragraph to read as follows:

The ERF is designed to burn up to 1200 tons per day (TPD) of refuse at a heating value of 4500 BTU's per pound, which amount will increase or decrease, respectively, based upon lower or higher heating values, in each case, resulting in an electrical generating capacity of 29 megawatts.

The reason for this suggested change is that it more adequately reflects the burning capabilities of the facility, inasmuch as tonnage put through the unit decreases with higher heating value, and increases with lower heating value. The new recommended language more accurately reflects the capacity.

In the second paragraph under part IV, at the top of the page, it is recommended that the word "modified" be inserted in front of PSD.

Under Part V, captioned "Air Quality Analyses" in the subsection captioned "Analysis of Existing Air Quality," there is a major typographical error in the last paragraph in line two. The second sentence of the last paragraph should read"

This value (1 ug/m³)

Our copy has an 11 instead of a 1. The value is correct in Table V-2, but needs to be corrected in the explanatory comments.

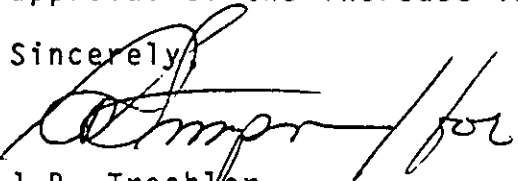
Mr. C. H. Fancy, P.E.
August 14, 1987
Page 3

OMSH recommends that paragraph three of the first page of the permit itself be reworded to segregate particulates from nitrogen oxides and sulfuric acid mist, in order to reflect that these pollutants are emitted from different parts of the plant. It is recommended that the first sentence be reworded to read as follows:

This permit modification pertains to the increases of nitrogen oxides and sulfuric acid mist from the stack and the emission of particulates from the ash residue dust suppression baghouse.

The second sentence of the third paragraph on the first page of the permit needs to be reworded to reflect acceptance of the increased emissions for sulfuric acid mist. As the second sentence presently reads, only specific conditions 1.a.(3), 1.b., and 1.c.(1), are being modified. None of these sections deals with emissions of sulfuric acid mist. Since the third sentence states that all conditions other than the specific conditions addressed in paragraph two remain unchanged, the combination of the second and third sentences does not reflect approval of the increase in sulfuric acid mist.

Sincerely,



J.R. Treshler
Senior Project Manager

JRT:hn

cc: Mr. Bill Thomas

ATTACHMENT 6

Attachment 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 18 1987

DER

SEP 18 1987

BAQM

4APT/APB-aes

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-2400

Re: Hillsborough County PSD-FL-120

Dear Mr. Fancy:

This is to acknowledge receipt of your July 14, 1987, PSD preliminary determination modifying emissions limits for sulfuric acid mist and nitrogen oxides, and the addition of particulate emission limits for the newly proposed ash handling emission control equipment.

We concur with your determination and permit conditions as indicated. However, the determination should make clear that the significant net emissions increase in nitrogen oxides and sulfuric acid mist for which this source is undergoing PSD review are not the result of a physical change or change in operation at the facility. The "Rule Applicability" section of the determination should provide explanation that the increases are requested permit modifications due to an error in estimating emissions in the construction permit application and that permit modifications resulting in significant net emissions increases require the issuance of a PSD permit. Although this modification requires that a BACT determination be performed for nitrogen oxides and sulfuric acid mist, the determination may consist of the previous BACT determination contained in the original EPA issued PSD permit without further evaluation of present BACT determinations (e.g. acid gas controls). This allowance is made due to the fact that emissions increases are not a result of a physical change in the plant or its operation, and are not due to the failure of prescribed pollution control equipment required in the EPA issued PSD permit.

Please note that the FDER issued PSD permit (PSD-FL-120) will supersede the emission limits for nitrogen oxides and sulfuric acid mist, as contained in the original EPA issued PSD permit (PSD-FL-104). Once the FDER PSD permit is issued, the facility will no longer be required to meet the nitrogen oxides, and sulfuric acid emissions limits contained in the EPA PSD permit PSD-FL-104 for reasons cited in your final determination.

We request that you submit copies of the final determination, which will address our concerns above, and permit when they are issued. If you have any questions, you may contact me or Wayne J. Aronson of my staff at (404) 347-2864.

Sincerely,

Wayne J. Aronson / Acting for

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. Roger P. Stewart, Director
Hillsborough County Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

Mr. William A. Gillen, Jr.
P.O. Box 3324
Tampa, Florida 33601

Copied: *Clair Jolley*
Barry Andrews
Produce Local } 9/21/87 *(m)*

ATTACHMENT 7



United States Department of the Interior
FISH AND WILDLIFE SERVICE

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

IN REPLY REFER TO:

SEP 22 1987

DER
SEP 28 1987
BAQM

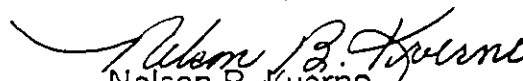
Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

We appreciate the opportunity to review and comment on the Technical Evaluation and Preliminary Determination for the proposed modification of the Prevention of Significant Deterioration permit for the Hillsborough County Resource Recovery facility. The Hillsborough County facility, located near Tampa, Florida, is approximately 80 km south of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service. Although we do not expect resulting emission increases from the proposed permit modifications to significantly impact the air quality or air quality related values of the refuge, we have several comments regarding the proposed modifications. These comments are discussed in the enclosed technical review document.

If you have any questions regarding our comments please contact Wayne King of our Air Quality staff at 303-969-2806.

Sincerely,


Nelson B. Kverno
Acting Regional Director

Enclosure

copied:

B. Andrews
T. Rogers
P. Raval
F. Campbell, HCEPC
CHF/BT

} 9-24-87 RAN

Technical Review of the Hillsborough County
Resource Recovery Facility Permit Modifications

The Hillsborough County Resource Recovery Facility (RRF) was originally granted a Prevention of Significant Deterioration (PSD) permit in July 1986 and consists of a mass burn boiler which can burn up to 1200 tons per day (TPD) of solid municipal waste. The Hillsborough County facility is located near Tampa, Florida, approximately 80 km south of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service. The steam from the boiler would be sent to a turbine generator with a capacity of 29 megawatts (gross). Generated electricity would be transmitted to the Tampa Electric Company for distribution. Hillsborough County is now requesting an increase in the permitted nitrogen oxide (NO_x) and sulfuric acid mist (H₂SO₄) emission limitations. The permitted, requested, and resulting emission increases are as follows:

<u>Pollutant</u>	<u>Permitted (TPY)*</u>	<u>Requested (TPY)</u>	<u>Increase (TPY)</u>
NO _x	657	1396	739
H ₂ SO ₄	17	306	289

*Tons Per Year

Based on the proposed emission increases, the requested modification of the Hillsborough County RRF permit constitutes a major modification of an existing major source and is subject to PSD review. Although we do not expect resulting emission increases from the proposed permit modifications to significantly impact the air quality or air quality related values of the refuge, we have several comments regarding the proposed modifications. These comments are discussed below.

The Hillsborough facility was initially issued a PSD permit which limited the emissions of NO_x and H₂SO₄ to 0.16 grains per dry standard cubic foot (gr/dscf) and 0.0040 gr/dscf corrected to 12% CO₂, respectively. Hillsborough County's request to modify the NO_x and H₂SO₄ emission limitations is based on test data that were unavailable at the time the permit was issued. Based on these data, Hillsborough County claims that they will be unable to meet the permitted NO_x and H₂SO₄ levels. Consequently, Hillsborough County has proposed that the NO_x limitation be increased from 0.16 gr/dscf to 0.34 gr/dscf, and the H₂SO₄ limitation be increased from 0.004 gr/dscf to 0.072 gr/dscf. The State of Florida has agreed to raise the NO_x limitation to 0.34 gr/dscf, or 6.4 lb NO_x/ton of refuse burned, whichever is more restrictive. For H₂SO₄, the State is deleting the emission limitation altogether based on the recommendation by EPA Region 4 that because no acceptable test method exists for measuring H₂SO₄ emissions from municipal solid waste incinerators, an emission limitation should not be specified in the permit.

Review of the NO_x emission test data provided by Hillsborough County shows that similar resource recovery facilities have NO_x concentrations similar to the preliminary test results at the Hillsborough County facility. For example, the Wurzburg facility tested at 318 ppm and the Stockholm facility tested at 311 ppm, compared to 327 ppm for the Hillsborough County facility. However, as a basis for the revised NO_x limitation, it appears Hillsborough County selected the permitted rate applicable to the Tulsa facility (404 ppm).

In addition, three other proposed mass burn resource recovery facilities, Broward South, Broward North, and Lake County, were recently permitted by the State of Florida at 5.0 lb NO_x/ton refuse burned. The 327 ppm concentration obtained from preliminary test results at the Hillsborough County facility converts to approximately 5.2 lb NO_x/ton of refuse burned, whereas the proposed 404 ppm limitation corresponds to 6.4 lb/ton. The proposed limitation for the Hillsborough County facility appears to be inconsistent with the preliminary test data from the facility and three other recent permitting decisions by the State which limited facilities to 5.0 lb/ton.

In conclusion, based on the information provided in the Technical Evaluation and Preliminary Determination for the modification of the Hillsborough County RRF permit, we recommend that the revised NO_x permit limit be based on (1) the preliminary test results of the Hillsborough facility of 5.2 lbs NO_x/ton refuse burned (327 ppm), or (2) the permitted NO_x emission limits set for the Broward South, Broward North and Lake County facilities (5.0 lbs NO_x/ton refuse burned). Another option available to the State is to leave the permit as it is until actual emission data from the facility are available. Rather than basing the revised NO_x limit on emissions data from other facilities or preliminary test results from the Hillsborough County facility, the State could wait until the Hillsborough facility achieves normal operation and conducts stack testing, and then modify the permit accordingly.

ATTACHMENT 8

COMMISSION
RODNEY COLSON
PAM IORIO
RUBIN E PADGETT
JAN KAMINIS PLATT
HAVEN POE
JAMES D. SELVEY
PICKENS C. TALLEY II



*vacuum app...
...
... 1987*

ROGER P. STEWART
DIRECTOR
1900 - 9th AVE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

October 2, 1987

Mr. Clair Fancy, P.E., Deputy Chief
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Hillsborough County RRF
RE: Proposed PSD Permit No. PSD-FL-121

Dear Mr. Fancy:

Thank you for still allowing our Agency the opportunity to comment on the Bureau's proposed permit for our county's resource recovery facility at Faulkenburg Road.

Our comments on the proposed permit are as follows:

1. Proposed specific condition 1.b. states PM emissions from from the ash handling facility shall not exceed 1.63 pounds per hour. Furthermore, condition 1.c.(1) mentioned Method 5 requirements on this source are waived by limiting the emissions to 5% opacity pursuant to Section 17-2.700(3)(d), F.A.C..

We recommend the above statements be changed to read:

1.b. In accordance with Subsection 17-2.650(2)(c)11., b., F.A.C., the maximum allowable emissions for the ash handling baghouse based on design flow of 9500 ACFM shall not exceed:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Limitation</u>
Particulate Matter	2.44	10.7	0.03 gr/dscf

Visible Emissions

None (visible emissions less than or equal to 5% opacity)

1.c.(1) Change last sentence of first paragraph to: "EPA Method 5 testing requirements on the ash handling baghouse exhaust shall be waived pursuant to Section 17-2.700(1)(d).6., F.A.C."

DER

OCT 5 1987

BAOM

Add the following to Section II. A. 3. as 'd'.

This baghouse shall be tested for visible emissions within 30 days of issuance of this permit and annually thereafter. The DER Method #9 test interval on this source shall be thirty (30) minutes. Two copies of the test data shall be submitted to the Air Section of the Environmental Protection Commission of Hillsborough County within 45 days of testing.

The above conditions are being recommended to clearly indicate the source is in a non-attainment area for particulates. As such, RACT requirements should be implemented. Furthermore, since no compliance test has yet been conducted on this baghouse, another sentence was added to require an annual Method 9 on the baghouse.

2. We recommend specific condition 9.b. be revised to require the permittee to submit quarterly reports within a certain time frame. Locally, we require all sources subject to 40 CFR 60.7 to submit excess emissions reports no later than 30 days from the end of each calendar quarter. We recommend this same time frame be used.

3. Specific condition 8 indicates annual compliance testing requirements are required for particulate matter and opacity. The operating permit for City of Tampa's RTE facility requires annual compliance testing requirements for particulate matter, opacity, SO₂, NO_x, and lead. Due to the varying nature of the garbage being burned, there is potential for SO₂, NO_x, and lead emissions to vary significantly from the results of the initial tests. Further, we feel it would be unfair to require different annual compliance tests between our two refuse to energy facilities. Both should have uniform testing requirements. We recommend condition 8 include annual testing requirements for SO₂, NO_x, and lead.

Your consideration of our input is appreciated. Please call me or Jerry Campbell if you have any questions.

Sincerely,



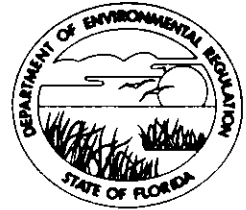
Victor San Agustin
Senior Air Permitting Engineer
Environmental Protection Commission
of Hillsborough County

Radeup Raval

cc:

Bill Thomas, CAPS/CHA/CAPS
Barry Andrews, BAQM
Bill Thomas, SWFDER

} 10/5/87



Interoffice Memorandum

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

TO: Dale Twachtmann
THRU: Howard Rhodes *HR*
FROM: Clair Fancy *CF*
DATE: October 13, 1987
SUBJ: Approval of Hillsborough County Resource
Recovery Facility
Federal Permit Number: PSD-FL-121

Attached for your approval and signature is a permit for the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site in Hillsborough County, Florida. There were comments received during the public notice period.

Day 90 after which these permits will be issued by default is December 11, 1987.

The Bureau recommends approval and signature.

CHF/MJ/s

attachment