

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



PM
 Federal Express
 Airbill No. 676269086
 10/2/87

File Copy

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
 BAQM

FEDERAL EXPRESS

USE THIS AIRBILL FOR DOMESTIC SHIPMENTS AND FOR SHIPMENTS FROM PUERTO RICO TO THE U.S.A.
FILL OUT PURPLE AREAS. FOR ASSISTANCE, CALL 800-238-5355 TOLL FREE.
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS.

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

DATE

1149-3914-5

10/7/87

From (Your Name) VICTOR SAU AGUSTINE		Your Phone Number (Very Important) (915) 770-5500		To (Recipient's Name) CLARK FANCY, R.E.		Recipient's Phone Number (Very Important) (704) 418-1344	
Company ETC/HC		Department/Floor No. 3rd		Company Bureau of Air Quality Management		Department/Floor No. 3rd Floor	
Street Address 110 AL 21ST STREET				Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result In Extra Charge.) 1000 CLARK STONE ROAD TWIN TOWNS OFF BLVD			
City TALLAHASSEE		State FL		City TALLAHASSEE		State FLORIDA	
AIRBILL NO. 676269086		ZIP Zip Code Required For Correct Invoicing 32305		ZIP Street Address Zip Required (Use P.O. Box Zip Code)		32301	

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE)
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PAYMENT Bill Shipper Bill Recipient's FedEx Acct. No. Bill 3rd Party FedEx Acct. No. Bill Credit Card

HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS STATION:
Street Address (See Service Guide or Call 800-238-5355)
City: State: ZIP: Zip Code of Street Address Required

SERVICES CHECK ONLY ONE BOX		DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED		PACKAGES	WEIGHT	TOTAL DECLARED VALUE	OVER SIZE
1 <input type="checkbox"/> PRIORITY 1 Overnight Delivery Using Your Packaging	6 <input checked="" type="checkbox"/> OVERNIGHT LETTER Overnight Delivery Using Our Packaging	1 <input type="checkbox"/> HOLD FOR PICK-UP	2 <input checked="" type="checkbox"/> DELIVER WEEKDAY				
2 <input type="checkbox"/> Counter-Pak Overnight Envelope	3 <input type="checkbox"/> Overnight Box	3 <input type="checkbox"/> DELIVER SATURDAY	4 <input type="checkbox"/> RESTRICTED ARTICLES SERVICE				
3 <input type="checkbox"/> Overnight Tube	4 <input type="checkbox"/> STANDARD AIR	5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS)	5 <input type="checkbox"/> DRY ICE				
SERVICE COMMITMENT		6 <input type="checkbox"/> OTHER SPECIAL SERVICE	7 <input type="checkbox"/> SATURDAY PICK-UP OR SATURDAY DROP-OFF				

Emp. No.	Date
<input type="checkbox"/> Cash Received	<input type="checkbox"/> Return Shipment
<input type="checkbox"/> Third Party	<input type="checkbox"/> Chg. To Del.
Street Address	City State Zip
Received By	Date/Time Received
FedEx Employee Number	FedEx Employee Number

RECIPIENT'S COPY

PART #2041788900
FEC-S-750-25
REVISION DATE 2/85
PRINTED U.S.A. NCR

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

Bradup Raval

cc:

Bill Thomas, CAPS/CHFCAPS

Barry Andrews, BAQM

Bill Thomas, SWFDER

} 10/5/87

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000



AN OGDEN COMPANY

October 1, 1987

HC-0964L
C-1005

Ms. Maggie Janes
State of Florida
Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DER
OCT 2 1987
BAQM

Subject: Original Affidavit and Public Notice

Dear Ms. Janes:

Please find enclosed the original Affidavit and Public Notice as it appeared in the Tampa Tribune 7/19/87 for the Hillsborough County Solid Waste Energy Recovery Project PSD Permit.

We thank you for bringing this matter to our attention.

Very truly yours,


J. R. Treshler
General Manager
Project Development
and Operations

JRT:hn
Attachment

cc: File 5.1

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL-FREE.

AIRBILL NUMBER

0843

724GN

DATE 10/1/87

AIRBILL NUMBER 084390

From (Your Name) **J. R. FRESHLER**
 Your Phone Number (Very Important)
 Company **UGDEN PROJECTS INC**
 Department/Floor No.
 Street Address **40 LANE RD**
 City **FAIRFIELD NJ**
 State **NJ**
 ZIP Required For Correct Invoicing

To (Recipient's Name) **MS. MAGGIE JAMES**
 Recipient's Phone Number (Very Important)
 Company **Florida Dept. of Environmental Regulation**
 Department/Floor No.
 Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result in Extra Charge.)
2600 Blair Stone Road
 City **Tallahassee, FL**
 State **FL**
 ZIP Street Address Zip Required **32999-2400**

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE)
 PAYMENT Bill Sender Bill Recipient's FedEx Acct. No. Bill 3rd Party FedEx Acct. No. Bill Credit Card Cash

HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS LOCATION: Street Address (See Service Guide or Call 800-238-5355)

SERVICES CHECK ONLY ONE BOX

PRIORITY 1 Overnight Delivery (Using Your Packaging)
 OVERNIGHT DELIVERY USING OUR PACKAGING Courier-Pak Overnight Envelope* 12" x 15"
 Overnight Box A 12 1/2" x 17 1/2" x 3"
 Overnight Tube B 36" x 6" x 6" 8"
 *Declared Value Limit \$100.

STANDARD AIR Delivery not later than second business day

SERVICE COMMITMENT
 PRIORITY 1 - Delivery is scheduled early next business morning in most locations. It may take two or more business days if the destination is outside our primary service areas.
 STANDARD AIR - Delivery is generally next business day or not later than second business day. It may take three or more business days if the destination is outside our primary service areas.

Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.
 Release
 Signature

DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED

HOLD FOR PICK-UP (See Section 11 at right)
 DELIVER WEEKDAY
 DELIVER SATURDAY (Extra charge)
 DANGEROUS GOODS (P-1 and Standard Air Packages only. Extra charge)
 CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Do Not Complete Section 5)
 DRY ICE
 OTHER SPECIAL SERVICE
 SATURDAY PICK-UP (Extra charge)

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	LBS		
	PCS		
	LBS		
Total	Total	Total	Total

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 Emp. No. Date
 Cash Received
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Federal Express Use Base Charges
 Declared Value Charge
 Origin Agent Charge
 Other
 Total Charges
 PART #106001
 FEC-S-751-1000
 REVISION DATE 10/86
 PRINTED U.S.A. GBFE

RECIPIENT'S COPY

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } ss.

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 publica-
tion 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 H. Puatta

Notary Public, State of Florida

My Commission Expires Nov. 23, 1990

Bonded thru Troy Fain - Insurance Inc.

(SEAL)

The application is available
for public inspection during
normal business hours, 8:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:
Dept. of Environmental
Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental
Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
Hillsborough County
Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605
Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as of the Department's Tallah-
hassee address. All comments
mailed within 30 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.
3268 7/19/87

State of Florida
Department of
Environmental Regulation
Notice of Proposed Agency
Action on Permit Application
The Department of Environ-
mental Regulation gives notice
of its intent to issue a per-
mit to Hillsborough County to
increase the allowable
nitrogen oxides, sulfuric acid
mist, and particulate
emissions from their existing
energy recovery (municipal
solid waste incineration) facil-
ity. The facility is located in
Hillsborough County, approxi-
mately two miles east of
Tampa on the County's
Hollenburg Road site. A de-
termination of best available
control technology (BACT)
was required.
This application was re-
viewed under Florida Adminis-
trative Code Rules 17-2.500,
Prevention of Significant
Deterioration. Emissions of
nitrogen oxides, sulfuric acid
mist, and particulates will in-
crease by 739,289, and 7 tons
per year, respectively. The al-
lowable emissions of the other
pollutants are not being in-
creased. The Department has
completed a study of the po-
tential ambient air impact due
to the increase in emissions.
Based on this study, the De-
partment has reasonable as-
surance that the increase in
emissions will not cause or
contribute to an exceedance
of the ambient air quality stan-
dards for these pollutants. No
PSD increment analysis is re-
quired for this modification.
Persons whose substantial
interests are affected by the
Department's proposed permit-
ting decision may petition for
an administrative proceeding
(hearing) in accordance with
Section 120.57, Florida Stat-
utes. The petition must con-
form to the requirements of
chapters 17-103 and 28-5, Flori-
da Administrative Code, and
must be filed (received) in the
Office of General Counsel of
the Department at 2600 Blair
Stone Road, Twin Towers Of-
fice Building, Tallahassee, FL
32399-2400, within fourteen
(14) days of publication of this
notice. 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 ad-
ministrative determination
(hearing) under Section 120.57,
Florida Statutes.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agency
action. Accordingly, the
Department's final action may
be different from the position
taken by it in this preliminary
statement. Therefore, persons
who may not object to the pro-
posed agency action may
wish to intervene in the pro-
ceeding. A petition for inter-
vention must be filed pursuant
to Model Rule 28-5.207, et
seq., five (5) days before the final
hearing and be filed with the
hearing officer. If one has
been assigned of the Division of
Administrative Hearings, De-
partment of Administration,
2009 Apalachee Parkway, Tal-
lahassee, Florida 32399-2400. If
no hearing officer has been
assigned, the petition is to be
filed with the Department's
Office of General Counsel,
2600 Blair Stone Road, Tal-
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Failure to petition to intervene
within the allowed time frame
constitutes a waiver of any
right such person has to re-
quest a hearing under Section
120.57, Florida Statutes.

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
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LEGAL NOTICE

STATE OF FLORIDA DEPARTMENT OF
PROPOSED AGENCY ACTION ON PERMIT
APPLICATION

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

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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

Listie A. Puatta

(SEAL)

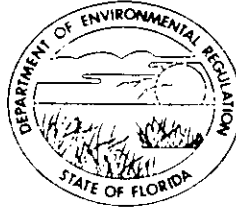
Notary Public, State of Florida
My Commission Expires Nov. 23, 1990
Bonded thru Troy Fain - Insurance Inc.

State of Florida
Department of
Environmental Regulation
Notice of Proposed Agency
Action on Permit Application
The Department of Environ-
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This application was re-
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Persons whose substantial
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partment of Administration,
2009 Apalachee Parkway, Tal-
lahassee, Florida 32399-2400. If
no hearing officer has been
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2600 Blair Stone Road, Tal-
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within the allowed time frame
constitutes a waiver of any
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quest a hearing under Section
120.57, Florida Statutes.
The application is available
for public inspection during
normal business hours, 8:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:
Dept. of Environmental
Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental
Regulation
Bureau of Air-
Quality Management
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
Hillsborough County
Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605
Any person may send writ-
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as of the Department's Tal-
lahassee address. All comments
mailed within 30 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.
3268 7/19/87

File

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

October 1, 1987

Mr. Miguel Flores
Chief, Permit Review and Technical
Support Branch
National Park Service-Air
Post Office Box 25287
Denver, Colorado 80225

Dear Mr. Flores:

RE: Hillsborough County Resource Recovery Facility
PSD-FL-121

Enclosed is a copy of the Intent to Issue (Public Notice for the above mentioned site which was published in the Tampa Tribune. If you have any questions, please call Barry Andrews or Tom Rogers at (904)488-1344 or write to them at the above address.

Sincerely,

Margaret Janes

Margaret V. Janes
Planner
Bureau of Air Quality
Management

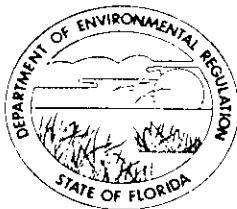
/mj

enclosure

file

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

October 1, 1987

Mr. Wayne Aronson
Chief
Program Support Section
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Hillsborough County Resource Recovery Facility
PSD Permit: PSD-FL-121

Enclosed is a copy of the Intent to Issue (Public Notice) for the above mentioned site which appeared in the Tampa Tribune. If you have any comments or questions, please contact Barry Andrews or Tom Rogers at the above address or at (904)488-1344.

Sincerely,

Margaret Jones

Margaret V. Janes
Planner
Bureau of Air Quality
Management

CHF/mj

enclosure

PM
9-23-87
West Caldwell, N.J.

File Copy

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000



AN OGDEN COMPANY

September 23, 1987

HC 0959L
C-1005

Mr. Pradeep Raval
State of Florida
Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

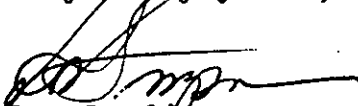
Subject: Hillsborough County Florida
Solid Waste Energy Recovery Project
Public Notice

Dear Mr. Raval:

Enclosed is a copy of the Public Notice published in the Tampa Tribune on July 19, 1987, as well as the notarized proof of publication prepared by the Tampa Tribune.

Please advise us if additional information in this regard will be needed.

Very truly yours,


Roy D. Simpson
Site Supervisor

RDS:hn

copied:

Pradeep Raval }
Barry Andriacos } 9-28-87 RAN
Tom Rogers }
CHF/BT } (verbally told CHF)
Wayne Aronson, EPA }
Miguel Flores, MPS } not copied yet (✓ PN for correctness)
Victor San Agustin -10/2/87 (my) } before sending RAN

DER
SEP 28 1987
BAQM

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough

Before the undersigned authority personally appeared
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of advertisement being a

LEGAL NOTICE

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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

(SEAL)

Bonded This Tray Fair - Insurance Inc.

Notice of Proposed Agency Action on Permit Application
The Department of Environmental Regulation gives notice of its intent to issue a permit to Hillsborough County to increase the allowable nitrogen oxides, sulfuric acid mists, and particulate emissions from their existing energy recovery (municipal solid waste incineration) facility. The facility is located in Hillsborough County, approximately 7 miles east of Tampa on the County's Henderson Road. A determination of best available control technology (BACT) is required.
This application was reviewed under Florida Administrative Code Rules 17-2.300, Intervention of Significant Emissions of Nitrogen oxides, sulfuric acid mists, and particulates will increase by 79,289 and 7 tons per year, respectively. The allowable emissions of the other pollutants are not being increased. The Department has completed a study of the potential ambient air impact due to the increase in emissions. Based on this study, the Department has reasonable assurance that the increase in emissions will not cause or contribute to an exceedance of the ambient air quality standards for these pollutants. No PSD increment analysis is required for this modification.
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. The petition must conform to the requirements of Chapters 17-183 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department of 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, FL 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right, such as an administrative determination (hearing) under Section 120.57, Florida Statutes.
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Board Rule 28-5.207 at least ten (10) days before the final hearing and be filed with the hearing officer. If one has been approved of the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32399-4000. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.
The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Dept. of Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33616
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Hillsborough County Environmental Protection Commission
1410 N. 21st Street
Tampa, Florida 33605
Any person may send written comments on the proposed action to Mr. Bill Thomas of the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.
3268
-7/19/87

PM

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PSD-FL-131



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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
Nelson B. Kverno
Acting Regional Director

Enclosure

copies:

- B. Andrews
 - T. Rogers
 - P. Rival
 - F. Campbell, HCEPC
 - CHF/BT
- } 9-24-87 RM

Messie,

Capital Frondorp, Town,

Danny & CHF/BT, Also,

HCEPC - F. Campbell,

RR

PSD-F-181

9-22-87

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*Mr Bill Thomas
Bureau of Air Quality Mgmt
Department of Environmental Reg
Deer Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32319-2400*



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.



PM
14 Sept. 87
Atlanta, GA

File copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 11 1987

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

DER

SEP 18 1987

BAQM

Re: Hillsborough County PSD-FL-¹²¹~~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

Copies: *Clair Jancy*
Barry Andrews
Produce Canal } 9/21/87 *(m)*

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
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ATLANTA, GEORGIA 30365

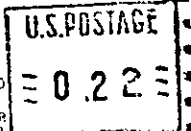
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Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair-Stone Road
Tallahassee, FL 32301-2400



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

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000



AN OGDEN COMPANY

TELECOPIED & SENT FEDERAL EXPRESS

August 14, 1987

HC-0918L
C-1005

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

DER

AUG 17 1987

BAQM

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.

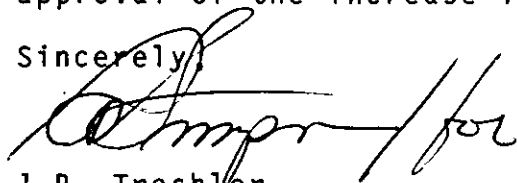
Mr. C. H. Fancy, P.E.
August 14, 1987
Page 3

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

Copies: CHE/BT
Barry Andrews

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AUG 12 1987

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DER

AUG 14 1987

BAQM

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

Dear Mr. Fancy:

This is to confirm an August 5, 1987, telephone conversation between you and Mr. Wayne J. Aronson of my staff regarding his upcoming inspections of resource recovery facilities in the Tampa and Miami, Florida areas. The following schedule and list of facilities to be visited have been discussed with the appropriate local agency contacts:

August 24, 1987 - Pinellas County Resource Recovery Facility (RRF)
- McKay Bay RRF
- Hillsborough County RRF

August 25, 1987 - City of Lakeland
- Dade County RRF

August 26, 1987 - Palm Beach County RRF

If you have any questions regarding these upcoming inspections, please feel free to contact me or Wayne J. Aronson at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

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

cc: Mr. Iwan Choronenko
Hillsborough County Environmental
Protection Commission

Mr. Patrick Wong
Dade County Environmental
Planning Division

Mr. Peter Hessling
Pinellas County Department of
Environmental Management

Mr. E. J. Sacco
Palm Beach County Health Department

Copied: CHF/BT
Barry Andrews } 8/17/87

PM
8-11-87
Tallahassee, FL

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

ATTORNEYS AT LAW

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(813) 223-7000

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PLEASE REPLY TO:

August 11, 1987

Tallahassee

Hamilton S. Owen
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER

AUG 12 1987

BAQM

Re: Hillsborough County resource recovery facility
PSD-FL-121

Dear Buck:

As you know, the Hillsborough County resource recovery facility was approved pursuant to the Florida Electrical Power Plant Siting Act (Act), Sections 403.501-.519, Florida Statutes. Hillsborough County needs to modify two conditions of the site certification pursuant to Section 403.516(2), Florida Statutes, by entering into a written agreement with the parties to the site certification process.

The specific changes in the conditions of site certification deal with air pollution issues. Those changes already have been tentatively approved by the DER Bureau of Air Quality Management and the U.S. Environmental Protection Agency.

We have prepared a draft Stipulation and Agreement for approval by the Department, Southwest Florida Water Management District, Department of Community Affairs, and Public Service Commission. If the draft agreement is acceptable, I would like the Department's counsel to sign the agreement and then I will circulate it to the other agencies for their signature. When I have received the approval of all of the appropriate agencies, I will bring the agreement back to you for submittal to the Governor and Cabinet, sitting as the Siting Board.

Hamilton Oven
Page Two
August 11, 1987

Please call me after you have had an opportunity to review this draft stipulation.

Sincerely,



David S. Dee

cc: Dan Thompson
Richard Donelan
Barry Andrews ✓
Dan Fernandez (SWFWMD)
Ed Curren (SWFWMD)
Larry Keeseey (DCA)
Mike Twomey (PSC)
Joe Mount
Daryl Smith
Joe Treshler
Bill Gillen

DSD/vc:OVEN

Copied: Barry Andrews
CHF/BT

JULY 31, 1987

BEFORE THE GOVERNOR AND CABINET
OF THE STATE OF FLORIDA

IN RE: Hillsborough County)
Resource Recovery Project)
Modification of Certification)
Case No. PA 83-19)
_____)

STIPULATION AND AGREEMENT

WHEREAS, in August, 1984, Hillsborough County, Florida filed an application for certification of an electric generating resource recovery (solid waste to energy) facility; and

WHEREAS, the application for certification was reviewed and recommended for approval by the Florida Department of Environmental Regulation (DER), the Southwest Florida Water Management District (SWFWMD), the Department of Community Affairs (DCA), and the Florida Public Service Commission (PSC), pursuant to the Florida Electrical Power Plant Siting Act (Act), §403.501-.519, Florida Statutes; and

WHEREAS, the Hillsborough County resource recovery facility has been built and is ready to commence full time operation; and

WHEREAS, Hillsborough County needs to modify two conditions of certification; and

WHEREAS, the DER, SWFWMD, DCA, and PSC are willing to assist Hillsborough County in this regard; and

WHEREAS, the Act provides in Section 403.516(2), Florida Statutes, that the conditions of certification may be modified by mutual written agreement of the parties to the certification proceeding, subject to the approval of the Governor and Cabinet, sitting as the Siting Board;

NOW, THEREFORE, the DER, SWFWMD, DCA, PSC, and Hillsborough County hereby stipulate and agree that the conditions of certification for the Hillsborough County resource recovery facility should be modified in the manner described in paragraphs

DRAFT

1 and 2 below. The underlined words should be added to the conditions of certification; the ~~stricken~~ words should be deleted.

1. Condition II.A.1.a.(3) shall be modified to read as follows:

(3) Nitrogen Oxides: ~~3 lb/ton~~ 6.4 lb/ton.

2. Condition II.A.1.a.(8) shall be modified to read as follows:

(8) Visible emissions: opacity from each boiler shall not be greater than fifteen percent (15%) except that visible emissions of no more than twenty percent (20%) opacity may be allowed for up to 3 minutes in any one hour except during start up or upsets when the provision of 17-2.250, F.A.C. shall apply. Opacity from the ash handling facility baghouse shall not exceed 5%. Opacity compliance shall be demonstrated in accordance with Florida Administrative Code Rule 17-2.700(6)(a)., DER method 9. The compliance test requirements for the ash handling facility shall be waived in accordance with Rule 17-2.700(3)(d), F.A.C.

FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

DATE

BY: _____

DALE TWACHTMANN, SECRETARY
DAN THOMPSON, GENERAL COUNSEL
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

SOUTHWEST FLORIDA WATER
MANAGEMENT DISTRICT

DATE

BY: _____

GARY KUHL, EXECUTIVE DIRECTOR
DAN FERNANDEZ, GENERAL COUNSEL
2370 Broad Street
Brooksville, Florida 33512

DRAFT

DEPARTMENT OF COMMUNITY AFFAIRS

DATE

BY: _____

THOMAS PELHAM, SECRETARY
LAWRENCE KEESEY, GENERAL COUNSEL
2572 Executive Center Circle, East
Tallahassee, Florida 32399

FLORIDA PUBLIC SERVICE COMMISSION

DATE

BY: _____

KATIE NICHOLS, CHAIRMAN
MICHAEL TWOMEY, ASSISTANT COUNSEL
101 East Gaines Street
Tallahassee, Florida 32399-2400

HILLSBOROUGH COUNTY

DATE

BY: _____

DAVID S. DEE
Carlton, Fields, Ward, Emmanuel,
Smith, Cutler, & Kent, P.A.
Post Office Drawer 190
Tallahassee, Florida 32302

and

JOE HORN MOUNT
County Attorney
Post Office Box 1110
Tampa, Florida 33601

DSD/vc:Hills-RR4

P4
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Tallahassee, FL

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

ATTORNEYS AT LAW

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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

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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.

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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

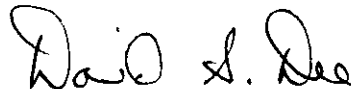
Clair Fancy
August 10, 1987
Page Four

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

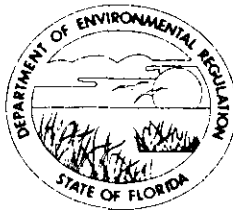
cc: Bill Thomas
Daryl Smith
Joe Mount
Emmy Acton
Richard Seelinger
Bob Hauser
Don Elias
Bill Gillen

DSD/vc:Hills-RR

F. Healey

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

July 14, 1987

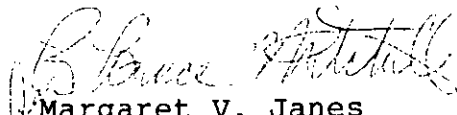
Mr. Miguel Flores
Chief, Permit Review and Technical
Support Branch
National Park Service-Air
Post Office Box 25287
Denver, Colorado 80225

Dear Mr. Flores:

RE: Technical Evaluation & Preliminary Determination
PSD-FL-121
Past Permit: PSD-FL-104
Hillsborough County Resource Recovery Facility

Enclosed for your review and comment is the Technical Evaluation & Preliminary Determination and draft permit for the above referenced facility. If you have any comments or questions, please contact Barry Andrews or Tom Rogers by August 14, 1987, at the above address or at (904)488-1344.

Sincerely,


Margaret V. Janes
Bureau of Air Quality
Management

/mj

cc: Russ Galipeau, NPS-SE Regional Office
Glen A. Carowan, Jr., US Fish & Wildlife Service
Chassahowitzka National Wildlife Refuge

enclosure

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

File Copy

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



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

July 14, 1987

Mr. Wayne Aronson
Chief
Program Support Section
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Technical Evaluation & Preliminary Determination
PSD-FL-121
Past Permit: PSD-FL-104
Hillsborough County Resource Recovery Facility

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Sincerely,

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Bureau of Air Quality
Management

/mj

enclosure