



Ogden Martin Systems of Hillsborough, Inc.  
350 N. Falkenburg Road  
Tampa, FL 33619  
813 684 5688  
Fax 813 684 7964

April 4, 2000

RECEIVED

APR 05 2000

BUREAU OF AIR REGULATION

Mr. C.H. Fancy, Bureau Chief  
Bureau of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Request to Amend Construction Permit # PSD-FL-121(B)  
FID No. 0570261 - Hillsborough County Resource Recovery Facility

0570261-002-AC

Dear Mr. Fancy,

Enclosed is a copy of the letter requesting the amendment of PSD-FL-121(B) for the Hillsborough County Resource Recovery Facility. The original letter was placed in the mail on March 23, 2000, and to date has not been received by your office.

In order to expedite the permit amendment process, we are submitting a replacement check in the amount of \$250 for the permit application fee. The enclosed check replaces check number 5785 that was sent with the original letter.

If the original letter does eventually arrive at your office, please return the original check (#5785) to the above address.

Please do not hesitate to contact Dan Strobridge, Camp Dresser & Mc Kee, Inc. at (813) 281-2900 if you have any question on the permit amendment itself. Otherwise I am available to answer any questions, I can be reached at (813) 684-5688.

Sincerely,

Rebecca S. Bigari  
Environmental Engineer



consulting  
engineering  
construction  
operations

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

March 23, 2000

RECEIVED  
MAR 25 2000

Mr. C. H. Fancy, Bureau Chief  
Bureau of Air Resources Management  
Florida Department of Environmental Protection  
1111 Magnolia Boulevard  
Tallahassee, Florida 32399-2400

OGDEN MARTIN SYSTEMS  
OF HILLSBOROUGH, INC.

Subject: Request to Amend Construction Permit # PSD-FL-121 (B)  
FID No. 0570261 - Hillsborough County Resource Recovery Facility

Dear Mr. Fancy:

This follows up on a March 13, 2000 meeting at the Hillsborough County Resource Recovery facility with Mr. Al Linero - and a March 15th followup meeting with FDEP staff in Tallahassee regarding this request to amend PSD-FL-121 (B) permit. Enclosed is a check for \$250 for the permit application fee. The purpose of this request is to ensure consistency between the pending Title V permit and applicable PSD-related documents for the Hillsborough County facility.

It is our understanding that the PSD permit must be changed to allow the Department to eliminate draft Title V language which we believe is inconsistent with the permitting history of this facility. It is also our understanding that the Department will amend the Power Plant Siting Act approval as needed to reflect approved PSD changes. The requested changes are detailed in a separate Attachment. The rationale for each requested change is also provided.

It is important to both Hillsborough County as the facility owner and permittee and Ogden Martin Systems of Hillsborough, Inc. (OMSII) as the facility operator that the Title V operating permit reflects the operating realities of the facility. Our goal is to ensure that neither document contains language nor permit conditions that unduly restrict operations of the facility or jeopardizes our ability to accurately certify compliance with both documents.

None of the requested changes will increase any emissions beyond that which the Department has already approved. Neither will these requested amendments result in any contravention of applicable ambient air quality standards. They are wholly consistent with 40 CFR 60, Subpart Cb Emissions Guidelines for Municipal Waste Combustors (MWC's).

Mr. C. H. Fancy, Bureau Chief  
March 23, 2000  
Page 2

Your assistance in processing this request in a time frame that will allow these changes to be incorporated into the final proposed Title V permit will be greatly appreciated.

Very truly yours,

CAMP DRESSER & MCKEE INC.

  
Daniel E. Strobridge, QEP  
Vice President

cc: A. Lino, P.E., FDEP  
S. Sheplak, P.E., FDEP  
E. Svek, FDEP  
T. Smith, Hillsborough County  
J. Burbridge, OMSH

## Attachment

### Request to Amend Air Construction Permit PSD-FL-121(B) – Facility ID No. 0570261

The following amendment requests refer to the June 26, 1998 air construction permit PSD-FL-121 (B). The referenced permit page number and subsection number are provided for each requested change. Where appropriate, requested/proposed text changes are presented *in italics* to facilitate the review process. PSD permit text for which deletion is requested is "~~blacked~~".

1. Subsection A. Facility Description. Please reword the permit to read that "the Facility generates electricity, and has an electrical generator *capable of generating 32.5 MW* for the entire Facility."
2. Page 4, Subsection B.1. Please reword the first sentence that: "the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application." It is respectfully requested that the permit be revised to state: "*Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and design specifications stated in the application. Operation of the facility shall be in accordance with the emission limits specified in this permit*"

This change will help ensure that descriptive language in the September 1997 "Source Modification Construction Air Permit Application" prepared by Camp, Dresser and McKee (CDM) on behalf of Hillsborough County does not become proscriptive permit limits. General descriptions of retrofit design and discussions of design operating parameters in the application were neither presented as, nor proposed for incorporation into the PSD document as permit limits. The application described the operating window for the facility. This information should not be restated in permits in a way that effectively binds facility operations to any specific design point within that window.

The requested substitute language intends to clarify that retrofit construction will conform to the design specifications cited in the application. It also intends to clarify that the facility will operate in conformance with specific emissions limits in the permit - based on state and federal regulations.

3. Page 6, Subsection A. As stated in our January 11, 2000 comment letter on the draft Title V permit, the regulatory language in 40 CFR 61, Subpart C indicates that the beryllium NESHAPS is not applicable to this facility. The Hillsborough County WTE facility does not accept any of the beryllium-containing wastes listed in the rule. It is our understanding that only incinerators that accept beryllium-containing waste generated by those source categories are affected by the rule. Therefore, we respectfully request deletion of all permit references to beryllium including emissions limits and testing requirements (Section III, Subsection B.8 on Page 12; page 42, Subsection C.29; Table 2-1).
4. Page 7. Subsection B. Specific Conditions, Permitting Note. This requests that the "shall not be exceeded" language regarding net steam energy either be deleted entirely or

rephrased to indicate that "The facility has a design net steam energy of 1158 Btu/lb". Net steam energy is not a defined regulatory term under Federal Subpart Cb regulations or State regulations. Unlike steam load or boiler feedwater, net steam energy is a calculated value and cannot be monitored on a real time basis. CDM's January 9, 1999 letter to FDEP presented sample calculations with assumptions designed to illustrate the relationship between steam flow and heat input - not as a proposed "not to exceed" value or operations limit. CDM's sample calculation included boiler design values for steam enthalpy (1378.86 Btu/lb) and feedwater enthalpy (220.82 Btu/lb).

This language is also inconsistent with FAC 62-210.300 which states in part that "(a)ny conditions or language in an air construction permit that are included for informational purposes only, if they are transferred to the air operation permit, shall be transferred for informational purposes only and shall not become enforceable conditions unless voluntarily agreed to by the permittee or otherwise required under Department rules." The County and OMSH are concerned about the "shall not" wording in both the PSD and draft Title V permits and respectfully request that this potentially enforceable permit language either be deleted from or rephrased in both permits.

Incorporating design numbers from the application into the PSD with language that functions like an operating limit via this permitting note is problematic. This difficulty is compounded since the draft Title V permit also cites net steam energy (1158 Btu/lb) as a "shall not be exceeded" value. Normal, safe, operation of these boilers can routinely exceed this calculated 1158 BTU/lb value. As currently worded, OMSH would, at times, either need to cut back operations to comply with a theoretical/design value and/or be subject to potential enforcement and non-compliance reporting for a value that has no clear regulatory basis or emissions limiting benefit.

5. Page 7, Subsection B.2 (a) - Please delete reference to "172.5 MMBtu per hour" as a maximum operating rate. The relationship between heat input, steam load and MSW throughput was clearly documented in CDM's 1997 application. Heat input is not directly measurable and is redundant to other, more direct, measurements of processing rates that limit MSW processing capacity. Since this value is not directly measurable, it is not practicably enforceable and it is respectfully requested that it be deleted as an operational limitation.
6. Page 7, Subsection B.2 (b) Please delete the combustion efficiency (CE) requirement; it was not requested by CDM in its construction permit application. CE is not a regulatory requirement under either federal Subpart Cb standard or applicable State regulations. CO is a surrogate for measuring combustion efficiency and Subpart Cb requires continuous CO monitoring. In that context, inclusion of CE in this permit is obsolete and redundant. Since Subpart Cb requires substantial reduction of carbon monoxide relative to prior PSD limits - along with installation of a continuous emissions monitor (CEMS) for CO, the new CO limit and CEMS equipment are more than adequate to document ongoing compliance with federal/state good combustion practice requirements.
7. Page 10, Section III, B.6.6, B.6.7, and B.25 (page 21). Please substitute "monthly average" for 30 day rolling average calculation of segregated waste since normal facility recordkeeping

procedures are done on a calendar month basis (and amend condition B.25 accordingly). The imposition of a 30-day rolling average requirement requires daily calculation of this value and imposes an unnecessarily burdensome additional recordkeeping requirement. A monthly block average eliminates added recordkeeping time/cost.

8. Page 11, Section III, B.6. With respect to segregated wastes, Mr. Drew Lehman of Ogden and Mr. Joseph Kahn of FDEP recently spoke by telephone about the Department's intent in listing specific approved waste streams in the permit. Mr. Kahn indicated that the intent is that no further Department approval will be needed for those wastes. It would be very helpful if the amended PSD permit contain a clarifying statement to the effect that "*Waste materials specifically authorized above do not require Department approval*". While DEP's approval is implicit in the permit as currently worded, an explicit statement will be most appreciated to minimize potential confusion and future questions on this point of regulatory intent.
9. Page 12, Section III, B.8. It is requested that this Table of emission limits be revised as follows.

- a. Please delete the lb/MMBtu and lb/hr columns since they are derived directly from and therefore wholly redundant to the tons per year (TPY) column. The TPY values in the permit are based upon and consistent with emission factor estimates in CDM's 1997 application. The TPY values were developed for the application using CDM's theoretical, proprietary "BURN" model calculation and presented as part of CDM's "netting" and air quality modeling analyses - not as not-to-exceed permit limits.
- b. It is our understanding that the TPY values are primarily used by FDEP for mass emissions rate information. Therefore, it is respectfully requested that a footnote be added to the Table stating that: "*The TPY (as well as lbs/hr and lb/MMBtu-if the prior request to delete these units is not granted) values in this Table are included for information purposes only and are not emissions limits.*"

To support this request, it is important to recognize that the emissions values listed in the table represent a substantial reduction (e.g. up to 95% for HCl) from pre-retrofit uncontrolled emissions - and prior PSD permits. Except for fluorides, beryllium, sulfuric acid mist and volatile organic compounds, the "Emissions Standards" presented in the table come directly from federal Subpart Cb standards. Historically, PSD permits for Hillsborough only had annual (TPY) emissions limits for NO<sub>x</sub> (739 TPY) and H<sub>2</sub>SO<sub>4</sub> (289 TPY). H<sub>2</sub>SO<sub>4</sub> limits were subsequently eliminated via PSD-FL-121 (A). Post-retrofit NO<sub>x</sub> emissions will be reduced by some 30% (from roughly 300 ppmv @7% O<sub>2</sub> to 205 ppmv@7%O<sub>2</sub>) - a reduction of hundreds of TPY relative to the currently permitted annual NO<sub>x</sub> limit. With the Subpart Cb NO<sub>x</sub> limit of 205 ppmv@7%O<sub>2</sub> being continuously monitored, and an annual inventory value developed, imposing a lower annual permit limit for NO<sub>x</sub> is redundant.

Finally, to confirm actual long-term post-retrofit reductions in annual emissions, the PSD permit requires the permittee to compile a ten-year inventory of annual emissions to verify that no significant increase in emissions has occurred. In summary, this

requests that all listed emissions values except those directly taken from Subpart Cb be flagged/footnoted as being for FDEP informational purposes only.

- c. Sulfuric acid mist. The limit for and testing of sulfuric acid mist was specifically eliminated via PSD-FL-121 (A). The Department's January 27, 1998 Technical Evaluation and Preliminary Determination report noted that "the (H<sub>2</sub>SO<sub>4</sub>) limit appears to have been deleted instead " (page 8). That report also states that "injection of ammonia or urea for NO<sub>x</sub> control will further suppress SAM emissions and possibly interfere with their measurement." Since this permit condition was formally eliminated via a prior PSD permit change, and recognizing the potential for test interference, it is respectfully requested that all references to an H<sub>2</sub>SO<sub>4</sub> limit and all requirements for testing be eliminated from the permit (i.e. Table B.8, Section III, B.9 and Method 8 reference)
10. Page 16, Subsection B.17 (a) This requests that the deadline for the annual report documenting compliance with the 10% annual fuel capacity factor limitation be extended to 60 days after the end of the calendar year. This is a professional courtesy to allow sufficient time to compile information given a typical crush of end-of-year data compilations.
11. Page 17, Subsection B.18. Technically, steam production, baghouse inlet temperature measurement, carbon injection system, and power generation monitors are not "CEMS" in the sense of gaseous pollutants. There are no federal (40 CFR 60 Appendix B & F) or State calibration and maintenance requirements for these devices. Please rephrase the permit to indicate that: *"These operational data monitoring systems shall be calibrated annually and operated in accordance with good engineering practice."*
12. Page 18, Subsection B. 20. Typo in second line, change to "the following date".

-Look for: blue background on the front of this check, and the imageSafe® logo on back. If not present, do not cash.

**OGDEN MARTIN SYSTEMS  
OF HILLSBOROUGH, INC.**

OPERATIONS IMPREST ACCOUNT  
350 N. FALKENBURG RD. 813-684-5688  
TAMPA, FL 33619

5808

DATE 4/4/00 5

32-1/1110 TX  
0

PAY TO THE ORDER OF Florida Department of Environmental Protection \$ 250.00

Two Hundred fifty and 00/100 DOLLARS



**Bank of America**

Customer Connection



VOID AFTER 90 DAYS

FOR Replaces #5785 - PSD121B Amendment

Nancy B. Delaney

⑈005808⑈ ⑆111000012⑆ 140 534 8332⑈

USA Bank of America NA  
© 2000 Bank of America NA  
All rights reserved. Bank of America NA is a registered trademark of Bank of America NA.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 4  
 ATLANTA FEDERAL CENTER  
 61 FORSYTH STREET  
 ATLANTA, GEORGIA 30303-8960

*Teresa* EJ  
 Windy  
 Britt  
 A1

APR 06 2000

4APT-ARB

Mr. Howard L. Rhodes, Director  
 Department of Environmental Protection  
 Division of Air Resources Management  
 Mail Station 5500  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400

SUBJ: Beryllium-Containing Wastes

Dear Mr. Rhodes:

Thank you for your correspondence, dated March 28, 2000, requesting an Environmental Protection Agency (EPA) determination regarding the applicability of the national emission standard for beryllium (40 C.F.R. part 61, subpart C) to municipal waste combustor (MWC) units subject to the emission guideline requirements of 40 C.F.R. part 60, subpart Cb. The question being addressed is whether a MWC unit is subject to the beryllium standard, because their air permit contains an emission limit for beryllium, although the unit does not accept or combust beryllium-containing wastes (as defined under subpart C).

Existing MWC units with a capacity to combust greater than 250 tons per day of municipal solid waste (MSW) are subject to 40 CFR part 60, subpart Cb (except as exempted in §60.32b). Pursuant to subpart Cb:

"MSW" is defined as household, commercial/retail, and institutional waste. Household waste includes material discarded by single and multiple residential dwellings, hotels, motels, and other similar permanent or temporary housing establishments or facilities. Commercial/retail waste includes material discarded by stores, offices, restaurants, warehouses, nonmanufacturing activities at industrial facilities, and other similar establishments or facilities. Institutional waste includes material discarded by schools, nonmedical waste discarded by hospitals, material discarded by nonmanufacturing activities at prisons and government facilities, and material discarded by similar establishments or facilities. Household, commercial/retail, and institutional waste does not include used oil, sewage sludge, wood pallets, construction, renovation and demolition wastes (including but not limited to railroad ties and telephone poles), clean wood, industrial process or manufacturing waste, medical waste, or motor vehicles (including motor vehicle parts or vehicle fluff). Household, commercial/retail, and institutional wastes include yard waste, refuse-derived fuel, and motor vehicle maintenance materials limited to vehicle batteries and tires (as specified in the rule).

2

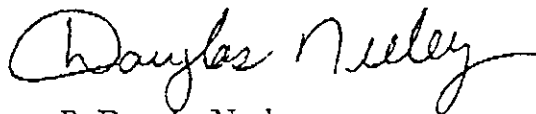
"MWC units" are defined as any setting or equipment that combusts solid, liquid, or gasified MSW including but not limited to, field-erected incinerators (with or without heat recovery), modular incinerators (starved-air or excess-air), boilers (i.e., steam generating units), furnaces (whether suspension-fired, grate-fired, mass-fired, air curtain incinerators, or fluidized bed-fired), and pyrolysis/combustion units. MWC units do not include pyrolysis/combustion units located at a plastics/rubber recycling units, cement kilns firing MSW, or internal combustion engines, gas turbines, or other combustion devices that combust landfill gases collected by landfill gas collection systems.

The provisions of 40 C.F.R. part 61, subpart C, are applicable to extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste. Beryllium-containing waste is defined as material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to subpart C. For this standard, an incinerator means any furnace used in the process of burning waste for the primary purpose of reducing the volume of the waste by removing combustible matter.

EPA addressed the issue at question in July 16, 1979, correspondence from the Division of Stationary Source Enforcement to EPA Region II regarding the definition of beryllium-containing waste in §61.31 (see Enclosure). According to this determination, beryllium-containing waste does not include materials such as scrap metals and calculators which may be burned at municipal waste incinerators. Beryllium-containing wastes only include wastes generated at ceramic plants, extraction plants, foundries, and propellant plants. However, should any of these wastes be disposed of at a municipal waste incinerator, that incinerator would be subject to the subpart C beryllium regulations. This same conclusion would also apply to MWC units; they would not be subject to subpart C requirements unless the unit combusted beryllium-containing waste from a subpart C affected facility.

Thank you for the opportunity to assist in this determination. If you have any questions, please contact Mr. Scott Davis of the EPA Region 4 staff at (404) 562-9127.

Sincerely,



R. Douglas Neeley

Chief

Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division

Enclosure

cc: Don Elias, RTP Environmental Associates  
Walt Stevenson, OAQPS  
Debbie Thomas, OECA

## Determination Detail

Control Number: ZC012

**Category:** NESHAP  
**EPA Office:** DSSE  
**Date:** 07/16/1979  
**Title:** Beryllium Containing Wastes  
**Recipient:** Dvorkin, Stephen A.  
**Author:** Reich, Edward E.  
**Comments:**

---

---

**Abstract:**

Does the term "beryllium containing wastes" include materials such as scrap metals and discarded electronic calculators which may be burned in municipal incinerators?

The term beryllium containing wastes includes only those wastes generated by a foundry, extraction plant, ceramic plant, or propellant plant.

---

---

**Letter:**

Control Number: ZC12

July 16, 1979

MEMORANDUM

SUBJECT: Beryllium Regulations

FROM: Director  
Division of Stationary Source Enforcement

TO: Stephen A. Dvorkin, Chief  
General Enforcement Branch  
Region II

This is a response to your memo of May 10, 1979, in which you requested a determination regarding the applicability of the beryllium standard to municipal incinerators. Basically, you asked whether the term "beryllium containing waste", as defined in 61.31(g) of the regulations, includes materials such as discarded electronic calculators and scrap metals which may be burned in municipal incinerators or whether it includes only those beryllium wastes generated at ceramic plants, extraction plants, foundries, and propellant plants.

I interpret the term "beryllium containing waste", defined as:

"material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by a source subject to this subpart"

to include only those wastes generated by a foundry, extraction plant, ceramic plant or propellant plant. While one might argue that incinerators are also "sources subject to this subpart" (see above definition) and that any beryllium wastes that contain beryllium which are burned in any incinerator should be subject to the standard, the control techniques and background documents do not support such an interpretation.

Section 3.6 of the document entitled "Control Techniques for Beryllium Air Pollutants" (February 1973) contains a discussion of methods for disposal of beryllium containing wastes. The document clearly indicates that it was the incineration of wastes generated by extraction plants, ceramic plants, propellant plants and foundries that we were concerned about in developing the standard. Moreover, the Economic Impact section of the document "Background Information on Development of National Emission Standards for Hazardous Air Pollutants: Asbestos, Beryllium, and Mercury" (March 1973) discusses the impact of the standard on only four industries: ceramic plants, extraction plants, propellant plants, and foundries. An assumption is made that most of the sources in those four categories will incinerate their own wastes on site. Thus, the cost of controlling emissions from beryllium incinerators seems to be taken into account in estimating the cost of the standard to the four listed source categories. This is one further indication that the standard was only intended to apply to the incineration of wastes generated at foundries, ceramic plants, extraction plants, and propellant plants. There certainly is no indication in either the preambles to the proposed and promulgated standards or any of the background documents that the standard was intended to apply to each municipal incinerator.

While most generators of "beryllium containing waste" may incinerate their wastes on site it is possible that in some cases they may transport the wastes to another facility for disposal. Should the wastes be disposed of at a municipal incinerator, that incinerator would be subject to the beryllium regulations. The regulations apply to any incinerator which burns beryllium containing wastes generated at a foundry, ceramic plant, propellant plant or extraction plant.

If the Regional Offices are not certain where beryllium containing wastes are being incinerated and whether the incineration facilities are in compliance with the NESHAP regulations, it might be desirable to request this information from the owners of beryllium waste generators via a 114 letter. In this manner, a list of incinerators subject to the beryllium standard could be assembled.

Should you wish to discuss this issue further, please contact Libby Scopino of my staff at FTS 755-2564.

Edward E. Reich

cc: Simms Roy, ESED  
Stu Roth, R. II, Enf.