

combustion chamber. n will also keep noise levels.

**ERY AFFECT
LLECTED?**

about our garbage when for collection. We rely to face the far greater of it economically and round manner. When nstructs the resource l be a major change in waste. But there won't we as citizens have to s will be needed. The and carried in covered tter will not be a prob- nce all activities con- will take place inside

**L BE NECESSARY
OPERATION?**

ery system needs a e of material left after unprocessable debris. percent or less of the to the facility will be st County landfill for ustion process in the will leave an inert ash o dispose of in a land- ery, the County can its Southeast County of this century.

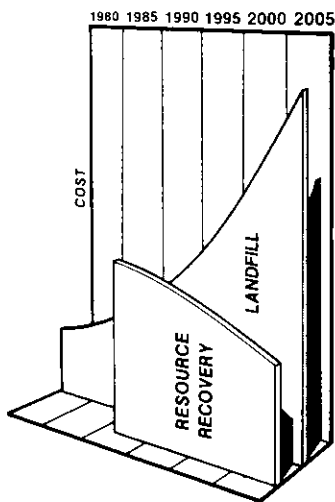
FOR?

construction revenue ment is entirely from

the revenues generated by the facility) will be issued. The money earned from the sale of electricity to a local electric utility; payments for materials recovered from the refuse; and user charges for every load of garbage brought to the plant, will repay the cost of funds used for financing its construction. At the time of construction, the cost for this bond issue is expected to total between \$150 and \$200 million. Included in the cost are transfer stations, access roads, weighing facilities, and landfill improvements. Lead underwriters for the bond issue are: William R. Hough and Company; Kidder Peabody and Company; Bache Halsey Stuart Shields, Inc.; Merrill Lynch White Weld; and E.F. Hutton and Company. Bond counsel for the County project is Bryant, Miller and Olive; its financial advisor is Jerry Williams, Inc.

**WILL RESOURCE RECOVERY BE MORE
EXPENSIVE THAN THE CURRENT SYSTEM?**

Initially, the cost to dispose of solid waste in the energy recovery facility will be higher than the cost of landfill disposal. However, this situation will change as the cost of landfilling increases over time, due to higher operating costs and more stringent environmental regulations. Revenues from the sale of electricity will increase as the price paid for the electricity rises, eventually bringing the cost of energy recovery below the cost of landfilling. The increased income from energy generated by the plant will result in net savings over time for the County and its residents.



For more information about Hillsborough County's Resource Recovery Program, write or call the Department of Solid Waste, P.O. Box 1110, Tampa, Florida 33601, Telephone (813)272-6677.

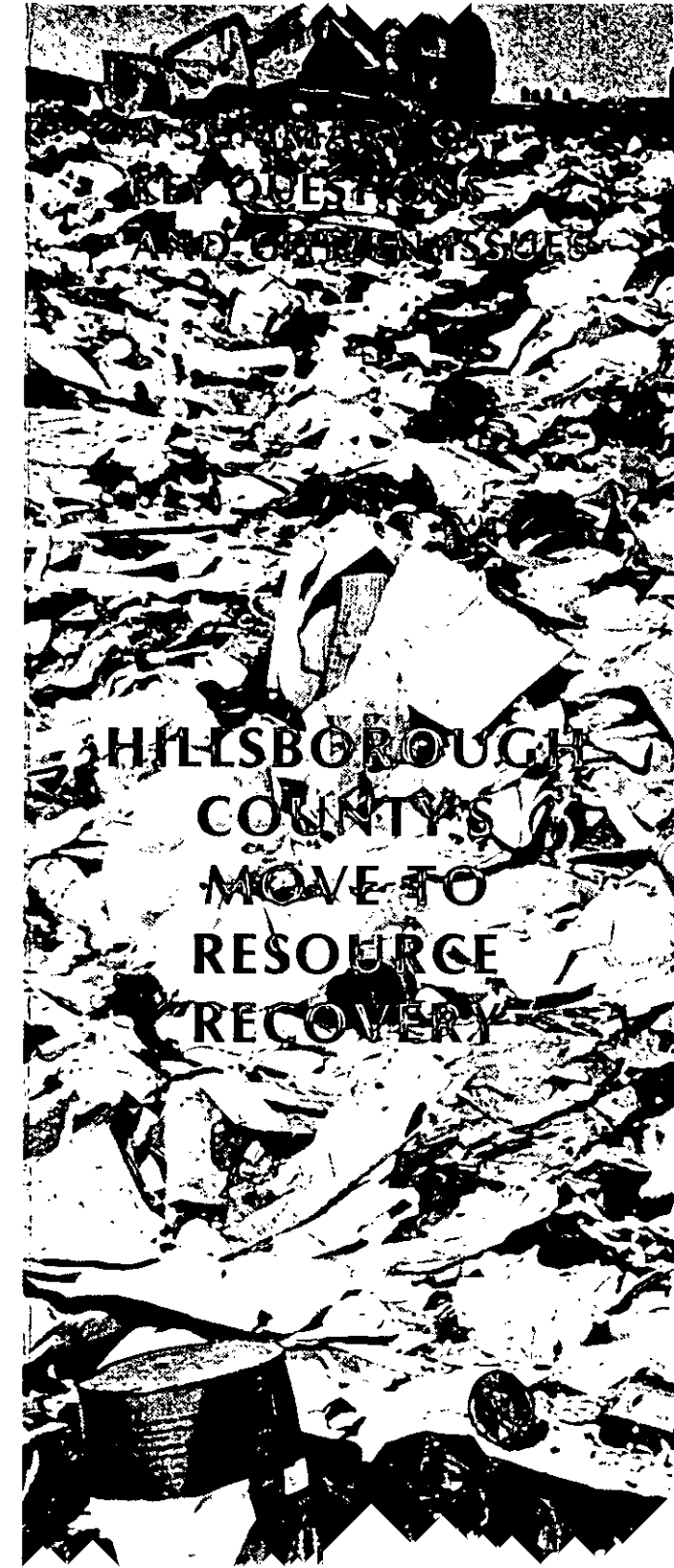
BOARD OF COUNTY COMMISSIONERS

- Jan K. Platt, Chairman
- Rodney Colson
- E.L. Bing
- Matt Jetton
- John Paulk

Norman W. Hickey,
County Administrator



This brochure is printed on recycled paper.



Hillsborough County's Solid Waste Problem

Hillsborough County's residents currently generate almost 600,000 tons of garbage and refuse annually. Every day, each person throws away over four pounds of refuse, an average family a little over two tons per year — roughly enough to cover the football field at Tampa Stadium with a daily two-foot deep layer of garbage and refuse, over 700 feet high by year's end. How to dispose of the cans, cereal boxes, newspapers, tires, bottles, and other castoffs of our rapidly growing county has become a problem of critical proportions.

Hillsborough County and its three incorporated cities of Tampa, Plant City and Temple Terrace presently dispose of their municipal solid waste at the Hillsborough Heights Sanitary Landfill. Approximately 2,000 tons of refuse (energy equivalent to 2,000 barrels of oil) are disposed of at this landfill daily, with the unincorporated areas contributing about half the total. In previous years, other city and county landfills were used, but are now closed. We have progressed in Hillsborough County from open dumps to the present modern method of sanitary landfilling.



However, due to strict federal and state laws governing landfill operations, areas which are environmentally and economically suitable for landfills in our rapidly urbanizing county are

quickly diminishing. Hillsborough County can no longer rely on conventional landfilling as its only method of solid waste disposal and is, therefore, developing an alternative primary disposal method — a modern resource recovery system.

The City of Tampa has contracted for the design, construction and operation of a resource recovery facility at the site of the non-operative Tampa incinerator at McKay Bay. This facility will be designed to burn only 1,000 tons per day of municipal solid waste generated primarily within the incorporated boundaries of Tampa. Hillsborough County is, therefore, pursuing the implementation of its own resource recovery facility to service the solid waste needs of its growing unincorporated areas.

The County's decision to build a resource recovery facility comes after several years of investigation by the Board of County Commissioners into alternative methods of resolving the growing solid waste problem in Hillsborough County. These methods included shredding refuse for landfilling, composting, and energy recovery. By using the energy obtainable from solid waste to generate electricity, resource recovery makes the most sense economically and environmentally, and provides a long-range solution to Hillsborough County's refuse disposal problem. Resource recovery plants, such as that planned for Hillsborough County, have been operating in Europe for the past 30 years, and more than 250 such plants are in operation worldwide. More and more communities in the United States are building similar resource recovery facilities; the technology is tested and proven.

... Some often-asked questions about resource recovery are:

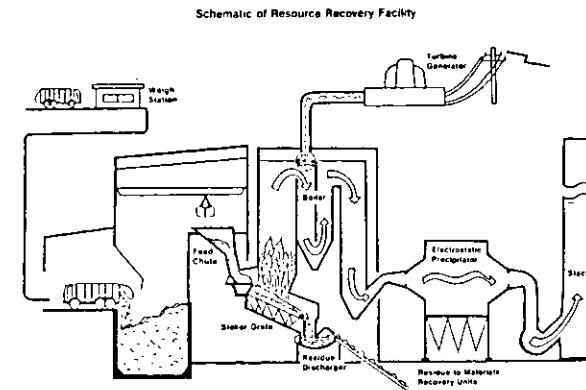
WHAT KIND OF DISPOSAL SYSTEM IS IT?

In general, resource recovery is defined as the process of obtaining energy and useful materials from municipal refuse. Energy can be extracted by burning the refuse and recovering the heat energy either in the form of steam or electricity. Materials also may be recovered, including fer-

rous and nonferrous metals, glass, and paper, among others.

After evaluating several resource recovery technologies, the County selected one that is technically proven, environmentally sound, and economically feasible. Called "mass burning", this system uses heat from burning unprocessed refuse to produce steam in a specially designed boiler. The steam is used to drive an electrical generator. Electricity generated in Hillsborough's plant will be enough to provide the needs of more than 10,000 homes.

As shown in the diagram below, refuse collection trucks and transfer trailers place their loads into a large receiving pit inside the plant. An overhead crane picks up this waste and drops it into a chute that feeds a furnace, where it is burned. Ashes and materials that won't burn fall off the end of the grate into a water tank. Metals and other materials may be recovered from the ash residue and sold as scrap.



WHAT ABOUT THE PLANT?

Hillsborough County's plant will be sized to take all the burnable garbage generated in the rapidly growing unincorporated areas of the County for the foreseeable future. A single contractor will be chosen by the County to plan and construct the facility.

WHERE WILL THE PLANT BE LOCATED?

The Board of County Commissioners has designated a 50-acre site north of State Road 60

and west of Fair Hillsborough's mass burning study prepared by consultant, Camp, Dresser and McKee, recommended this location. The location is near Brandon and Tampa. The location is north of waste collection facilities. The location is near the Crosstown Expressway. The location will be minimized for the County. Additionally, the area adjacent to the location is light and heavy industrial. The location is of commercial interest. The location is the possibility that the plant's combustion products will be an energy source by one of the following: businesses or by new businesses. The availability of this energy source is a key factor in the location study.

WILL THE FACILITY HARM THE ENVIRONMENT?

We are all concerned about the Florida environment, especially taken into account the resource recovery facility. Hillsborough County has been designated as an Environmental Protection Department of Environmental Protection "non-attainment" area. The resource recovery facility, any industrial development, require the lowest achievement control equipment and on-site investigation. The plants now operating in Hillsborough County are from the County facilities, federal, state, and county facilities.

Odors will not be a problem. Storage pits will be covered. The plant will be continuously drawn. The plant will provide oxygen. The type of air intake will be negative air pressure. The potential odors will be maintained in excess of the standards.

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

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O. K. REAVES 1877-1970
DOYLE E. CARLTON 1885-1972

LEWIS STATE BANK BUILDING

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May 20, 1986

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PETER W. ZINOBER

DER

MAY 21 1986

BAQM

Mr. Ed Svec
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Hillsborough County Resource Recovery Facility

Dear Ed:

I am sending you this letter to confirm our understanding about the comments you received from the U.S. Environmental Protection Agency concerning the Preliminary Determination and Draft Permit for the Hillsborough County resource recovery facility.

First, the EPA comment concerning Section 17-2.660, F.A.C., appears to be redundant. Section 17-2.660, F.A.C., establishes New Source Performance Standards that are based on the Clean Air Act, which is already cited in the Preliminary Determination. If EPA believes there is a meaningful distinction between Section 17-2.660, F.A.C. and the previously cited regulations, we would like to be advised in writing of this distinction so that we can determine whether to oppose the proposed EPA language. If, as it appears, there is no distinction, we have no objection to the additional citation recommended by EPA.

We have no objections to EPA's comments in their paragraphs no. 2, 3, 4, and 5.

Mr. Ed Svec
May 20, 1986
Page Two

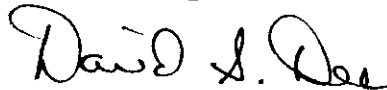
With regard to EPA comment no. 6, Hillsborough County does not object to a permit requirement which states:

"Hillsborough County shall provide space at the resource recovery facility for the future installation, if necessary, of a wet or dry flue gas scrubber."

The Hillsborough County facility is already substantially complete. It has space for a scrubber, if a scrubber is required by DER or EPA in the future. Please note, however, that the facility would need substantial additional work and retrofitting before a scrubber could be installed.

Finally, Hillsborough County disagrees with EPA's comment no. 7. Hillsborough County proposed an emission rate of 0.048 pounds per ton for lead. EPA proposed the emission limit of 0.020 pounds per ton. After substantial discussion, Hillsborough County reluctantly agreed to a permit condition of 0.020 pounds per ton, but that limit was not proposed by the County.

Sincerely,



David S. Dee

DSD/mm

cc: Mary Cummings
Don Elias



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MAY 2 1986

DER
MAY 8 1986

REF: 4APT/AP

BAQM

C. H. Fancy, P. E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

We have several comments on your March 25, 1986, PSD Preliminary Determination and Draft Permit for the Hillsborough County Energy Recovery Facility.

- 1) Page 3: From our reading of the Florida regulations, it appears that the source would also be subject to 17-2.660, the state NSPS. If so, this should be mentioned in this paragraph, as well as at the end of this section and in IV.b. on Page 10.
- 2) Page 7: As agreed to by EPA in meetings with the County, the SO₂ 3-hour limitation of 8.5 lb/ton is to protect the NAAQS, and is not necessarily BACT. BACT is 3.2 lb/ton 24-hour average.
- 3) Page 27: In Condition (11), "(2)" should be "(3)". Condition (2) is an opacity limit.
- 4) Page 28: In b.(1), the eighth line should begin with "during each" instead of "with the".
- 5) Table II-1: The emission rate for mercury should be 0.89 instead of 1.1.
- 6) The permit should contain a requirement that the facility include provision for the future installation of a wet or dry flue gas scrubber, if deemed necessary by EPA. This requirement is described on pages 9 and 10 of the Preliminary Determination.
- 7) Since the County has agreed to 0.020 lb/ton limit for lead, the list of emission rates proposed by the applicant on page 7 of the Preliminary Determination should include 0.020 for lead, instead of 0.048.

If you have any questions about our comments, please
contact Roger Pfaff at (404) 347-4253.

Sincerely yours,

Bruce P. Miller

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

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

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April 7, 1986

Ms. Susan L. Smith
Department of Justice
Environmental Defense Section
12th & Pennsylvania Avenue, N.W.
Washington, D.C. 20026-3986

DER

APR 8 1986

BAQM

RE: Hillsborough County Resource Recovery Facility

Dear Susan:

Pursuant to your instructions, Hillsborough County has published notice of its draft PSD permit. The notice appeared in the Tampa Tribune newspaper on Sunday, April 6, 1986. A copy of the notice is attached for your file. Since you have advised us that the notice should be published one time only, we do not intend to publish the notice again. It is our understanding that EPA does not need to publish notice in the Federal Register and, therefore, will not do so.

Please call us if you or EPA receive any written comments concerning the preliminary determination and draft permit.

Sincerely,

David S. Dee

DSD/mm
Attachment

cc: Gary Early, Esq.
Winston Smith
Jewell Harper
Ed Svec
Joe Mount, Esq.
Mary Cummings

Notice of Intent to Issue a
Significant Determination
(SD)

Draft Permit

Name and address of applicant

Hillsborough County
Hillsborough County
Commission

419 Florida Street
Tampa, Florida 33602

Name and address of office
processing application

Department of
Environmental Regulation
Bureau of Air Quality
Management

2600 Blair Stone Road
Tallahassee, Florida 32301

On December 12, 1984, Hillsborough County applied to the Florida Department of Environmental Regulation (DER) to construct an energy recovery facility (capacity of the county's Pensacola Road site. The application is subject to U.S. Environmental Protection Agency (EPA) regulations for Prevention of Significant Deterioration of Air Quality (PSD), codified at 40 CFR 52.91. These regulations require that, before construction on a source of air pollution subject to PSD may begin, a permit must be obtained from EPA. Such permit can only be issued if the new construction has been determined by EPA to comply with the requirements of the PSD regulations which are described in 40 CFR 52.91. These requirements include a restriction on the incremental increase in air quality due to the new source, and application of best available control technology (BACT).

The DER has been granted delegation by EPA to carry out the PSD review of this source, except for final signature of the PSD permit. Acting under that delegation, the DER has prepared a draft permit and made a preliminary determination that the construction will comply with all applicable provisions of the PSD regulations. The degree of increment consumption that will result from the construction is:

Class I Area

Pollutant	Annual Average
PM ₁₀ Dielside	120% 120% 120%
SO ₂	145% 145%

Class II Area

Pollutant	Annual Average
PM ₁₀ Dielside	137% 137% 137%
SO ₂	161% 161% 161%

A copy of the administrative record of this application, including the draft PSD permit, the preliminary determination, and all materials submitted by the applicant, will be available for review for 30 days during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except local holidays, at the following locations:

Department of
Environmental Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301
Department of
Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa Florida 33607

be available to:

C. H. Pansy, P.E.

Bureau of Air

Quality Management

Department of

Environmental Regulation

2600 Blair Stone Road

Tallahassee, Florida 32301

Telephone (904)222-1344

Further information on the application, including copies of the application, the draft permit, and a fact sheet, may be obtained from the person named above.

All comments postmarked within 30 days of the date of this notice will be considered by DER in preparing the final determination. The final determination will be sent to EPA for issuance or denial of the PSD application.

Any person may request a public hearing on the draft permit. Request must be in writing, and shall state the issues to be raised in the hearing.

Requests for a hearing must be postmarked not later than 30 days from the date of this notice and sent to:

C. H. Pansy, P.E.

Bureau of Air

Quality Management

Department of

Environmental Regulation

2600 Blair Stone Road

Tallahassee, Florida 32301

Telephone (904)222-1344

A special set of circumstances is applicable to this PSD permit application. A permit to construct the source was issued by the Power Plant Siting Board on December 12, 1984 under the Florida Power Plant Siting Act. At that time, DER considered such a permit to constitute a PSD permit issued under Florida's PSD regulations, which have been approved by EPA. Such approval by EPA transferred permit signature authority for PSD sources from EPA to DER.

Subsequent to the issuance of that permit, EPA determined that Power Plant Site Certifications, because of certain procedural differences, do not constitute PSD permits under the DER regulations, and thus do not satisfy the requirements of the Federal Clean Air Act. In order to rectify this situation, EPA withdrew authority from DER to issue PSD permits to such sources, but delegated to DER the authority to process the PSD applications in preparation for issuance of a permit by EPA.

Since Florida had already issued a Site Certification to Hillsborough County, the source had begun construction prior to EPA's determination that the Florida procedure is inadequate.

Consequently, EPA issued an administrative order under Section 167 of the Clean Air Act, which required Hillsborough County to either immediately apply for a PSD permit or cease construction. Because of the special circumstances surrounding this application, EPA determined that the determination of best available control technology for this source could be made as of the date of the original complete application to Florida for a Power Plant Site Certification permit. Therefore, the draft permit and preliminary determination reflect the best available control technology as of August 12, 1984, the date of that application.

Consequently, EPA issued an administrative order under Section 167 of the Clean Air Act, which required Hillsborough County to either immediately apply for a PSD permit or cease construction. Because of the special circumstances surrounding this application, EPA determined that the determination of best available control technology for this source could be made as of the date of the original complete application to Florida for a Power Plant Site Certification permit. Therefore, the draft permit and preliminary determination reflect the best available control technology as of August 12, 1984, the date of that application.

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THE TAMPA TRIBUNE Classified Section

RTP Environmental Associates
AIR, WATER, MEASUREMENT AND CONTROL

DER

MEMORANDUM

MAR 5 1986

TO: David Dee
FROM: Donald F. Elias *DFE* **BAQM**
SUBJECT: Hillsborough Resource Recovery Facility
DATE: March 4, 1986

Based on our meetings with FDER and USEPA, it appears that the final resolution of CPA's S167 action is in sight. As promised, I'm sending the information concerning the air quality impacts from a three hour 8.5 lbs/ton emission rate for SO₂. Starting with Table V-2, page 23 of the latest FDER Staff Analysis, the SO₂ emissions 1760 tpd charge rate at 3.2 29.6 grams/sec. This rate becomes 78.6 grams/sec for 8.5 lbs/ton as follows:

$$\frac{3.2}{8.5} = \frac{29.6}{x} \quad x = 78.6 \text{ grams/sec}$$

where x = emission rate in grams/sec for 8.5 lbs/ton.

Since the modeling for the facility is based on a single point source, impacts are linearly proportional to emissions. Therefore, impacts for an 8.5 lb/ton emission rate are 2.66 times the predictions for 3.2 lb/ton rate. Table V-6, page 32 of the FDER staff analysis shows the three hour SO₂ facility impact is 40 ug/m³ at the proposed SO₂ emission rate of 8.5 lbs/ton, the impact becomes 106 ug/m³. The attached Table summarizes the new impacts. It should be noted that the results are based on a 1760 tpd facility, while the permit will only be for a 1320 tpd plant. This assumption combined with the tremendous overconsumption of increment by the analysis for the TECO Big Bend power (see pg. 29, FDER Staff Analysis) results in a very conservative approach.

As regards the Significant Impact Area (SIA), the facility modeled at 1760 tpd, 3.2 lb/ton yielded a 0.9 Km SIA. The distance to the SO₂ non-attainment area is 43.5 Km. The increased rate will not extend the SO₂ SIA to require either additional sources to be considered, or to interact with the non-attainment area.

DE:ebe
Attachments (2)

cc: R. Porter
P. Kennedy
D. Twachtmann
B. Hauser

(EBE10/32)

RTP Environmental Associates
 AIR, WATER, MEASUREMENT AND CONTROL

TABLE A

3-HOUR SO₂ IMPACTS FROM THE HILLSBOROUGH COUNTY
 RESOURCE RECOVERY FACILITY FOR A 8.5 LB/TON EMISSION RATE
 (All Values in ug/m³)

NAAQS Compliance¹

<u>Maximum Facility Impact</u>	<u>Maximum Impact All Sources</u>	<u>Existing Background</u>	<u>Maximum Total Impact</u>	<u>NAAQS</u>
106	453	493	1052	1300

PSD INCREMENT COMPLIANCE²

<u>Maximum Facility Impact</u>	<u>Predicted Increased Concentration</u>	<u>Total Increment Consumed</u>	<u>PSD Class II Increment</u>
106	359 ³	465	512

¹Based on Table V-6, pg. 32 FDER Staff Analysis

²Based on Table V-5, pg. 30 FDER Staff Analysis

³Includes the Hillsborough facility impact

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

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March 4, 1986

DER

MAR 5 1986

VIA FEDERAL EXPRESS

BAQM

Ms. Susan L. Smith
Department of Justice
Environmental Defense Section
12th & Pennsylvania Avenue, N.W.
Washington, D.C. 20026-3986

RE: Hillsborough County Resource Recovery Facility

Dear Susan:

At your request, we have prepared this letter in response to the issues raised at our meeting at EPA in Atlanta on February 27, 1986. We hope that the information contained in this letter will resolve all of the remaining EPA concerns about the proposed PSD permit for the Hillsborough County resource recovery facility.

Sulfur Dioxide

Hillsborough County would prefer to utilize a 24-hour average emission limit for sulfur dioxide. The permit issued pursuant to the Florida Electrical Power Plant Siting Act established a 24-hour limit of 3.2 lbs. of sulfur dioxide per ton of refuse. If a 3 hour emission limit must be imposed, Hillsborough County believes that the emission limit should be 8.5 lbs./ton. This proposed emission limit is supported by the report previously submitted to you concerning the Indianapolis

Ms. Susan L. Smith
Department of Justice
March 4, 1986
Page Two

resource recovery facility. Additional support is provided by the attached report concerning the facility in Gallatin, Tennessee.

A 3 hour emission limit of 8.5 lbs./ton will not violate any relevant air quality standard. The attached memorandum from Donald Elias demonstrates that the proposed emission limit will not cause or contribute to any violation of the 3 hour National Ambient Air Quality Standards, it will not exceed the available PSD increment, or affect the significant impact area.

Lead

Since EPA insists on a lead emission limit, Hillsborough County will accept the proposed permit condition described by EPA. It is our understanding that the lead emission limit will initially be set at .02 lbs./ton. If the initial compliance tests show that the lead emissions from the Hillsborough County resource recovery facility are greater than or equal to .008 lbs./ton, the lead emission limit of .02 lbs./ton will remain in effect. If the initial compliance tests show that the lead emissions are less than .008 lbs./ton, the lead emission limit will be reduced to .01 lbs./ton.

As you know, Hillsborough County has been reluctant to accept a proposed emission limit as low as .01 lbs./ton because the County is greatly concerned about its ability to consistently meet this permit condition. During our meeting on February 27, 1986, EPA representatives acknowledged our concern and expressed their willingness to reevaluate the proposed lead emission limit in the future, if necessary. It was recognized that Hillsborough County might operate its facility in an appropriate manner, but nonetheless experience difficulty complying with the proposed lead emission limit. Although Hillsborough County will do its utmost to comply with the proposed permit conditions, we appreciate EPA's willingness to discuss these issues in the future, in the event that Hillsborough County does experience operational difficulties.

Ms. Susan L. Smith
Department of Justice
March 4, 1986
Page Three

Wastewater Treatment Plant

At your request, we have obtained additional information concerning the proposed wastewater treatment plant which will be located near the Hillsborough County resource recovery facility. The wastewater treatment plant will have a nominal capacity of 3 million gallons per day. It will be equipped with a sulfide stripper in the grit building which will utilize a wet scrubber and charcoal filter. This equipment also should reduce organics. It is our understanding that significant quantities of organics in the wastestream are not anticipated. The collection area is primarily suburban and well controlled.

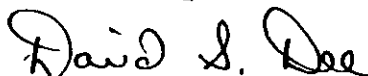
There is no reason to believe that the facility will emit any significant quantity of any PSD regulated pollutant. The facility should not emit more than 40 tons per year of volatile organic compounds or 10 tons per year of hydrogen sulfide (H₂S). As a practical matter, the facility would be subject to enforcement proceedings for excessive odors if H₂S emissions were more than 10 tons/year.

Supplemental Fuel Burner

The information you requested about the auxiliary fuel and supplemental fuel burner is set forth in the attached letter from Mr. Seelinger dated March 3, 1986.

Please call me at your earliest convenience if you have any questions about these matters.

Sincerely,



David S. Dee

DSD/mm

cc: Gary Early, Esq.
Winston Smith
Dale Twachtman
Ed Svec
Joe Mount, Esq.
Mary Cummings

RECEIVED MAR 04 1986

OGDEN MARTIN SYSTEMS, INC.
140 EAST RIDGEWOOD AVENUE
PARAMUS, N. J. 07652

RICHARD W. SEELINGER
EXECUTIVE VICE PRESIDENT
(201) 599-2400

March 3, 1986

DER

MAR 5 1986

BAQM

David Dee, Esquire
Carlton, Fields, Ward Emmanuel
Smith & Cutler, P.A.
Lewis State Bank Bldg.
P.O. Drawer 190
Tallahassee, Florida 32302

RE: Platt V. EPA, No. 85-3946
(11th Circ.)

Dear Mr. Dee:

The purpose of this letter is to document our written response to the remaining technical issues on the Hillsborough air quality permit. At our meeting on February 27, 1986 there were three concerns raised by Region IV of the Environmental Protection Agency (EPA). It is still Ogden's belief that these issues should not have to be addressed, since Hillsborough County already holds a legal air quality permit. However, in the interest of EPA expeditiously issuing a new air quality permit for the construction of the Hillsborough facility we have addressed the following concerns.

Sulfur Dioxide

As you are aware, our original air permit specified a maximum sulfur dioxide (SO₂) emission factor of 3.2 lbs./ton of refuse for a twenty-four hour averaging period. EPA has drafted an air quality permit with the same emission factor but with a three-hour averaging period. Since EPA is interested in maintaining a three-hour averaging period for reasons of enforceability, Ogden has proposed to EPA an emission factor of 8.5 lbs./ton. To support this emission factor a report prepared for the City of Indianapolis on SO₂ was submitted to EPA. The report is entitled a "Determination of LAER for SO₂." In addition, we are enclosing another report to further justify the proposed emission number entitled "An Emission Test of Solid Waste Combustion in a Rotary Combustor/Boiler System at Gallatin, Tennessee." We trust these reports will provide sufficient documentation for the proposed emission factor.

TO: David Dee, Esquire
DATE: March 3, 1986

Page 2

Lead

In the newly drafted permit, it is EPA's intention to regulate lead emissions from our facility. It is still Ogden's position that a lead emission limit should not be assigned, since we can only control lead emission by our particulate control device. The electrostatic precipitator for the Hillsborough facility has been determined to be Best Available Control Technology for controlling lead. Furthermore, we have supported our position with literature on lead emissions for refuse incineration installations. The emission fluctuated quite substantially over time. Again, in order to expedite the issuance of the new permit, Ogden has agreed initially upon a lead emission factor of .02 lb./ton. This emission factor will remain in effect if the emission compliance testing that will be performed during startup is greater than or equal to .008 lb./ton. If testing proves the emission rate is less than .008 lb./ton, a new emission limit of .01 lb./ton will be established.

Supplemental Fuel Burner

The EPA has requested information on the type and quantity of auxiliary fuel that will be used to start the facility. Based on a reference waste of 4,500 Btu/lb. and on a firing rate of 400 tons of refuse per furnace train per day, the gross heat release is calculated as follows:

$$\frac{4,500 \text{ Btu}}{\text{lb.}} \times \frac{2,000 \text{ lb}}{\text{ton}} \times \frac{400 \text{ ton}}{\text{day}} \times \frac{\text{day}}{24 \text{ hr.}} = \frac{150 \text{ Mbtu}}{\text{hr.}}$$

The supplemental fuel burners are designed for 15% of capacity to preheat the boiler and precipitator above the acid dewpoint, it is estimated the burners of each unit will have a maximum design rating of 22.5 MBtu. The supplemental fuel burners would fire natural gas and would be used during startup (estimated 10 times per year or less) for six hours each period or 60 hours of operating time over the year. Therefore, each train is estimated to burn 1.35 million cubic feet of natural gas during a year assuming 1000 Btu for each cubic foot of gas.

I hope these written responses will finally resolve all remaining Hillsborough issues so that a newly drafted permit can be issued by the EPA. Please contact me if we can be of help with any other additional information.

Very truly yours,



Richard W. Seelinger
Executive Vice President

GC:RWS:jc
Encl.

cc: G. Crane, J. Treshler, T. Sweeney, pf Hillsborough