



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 20 2006

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BUREAU OF AIR REGULATION

Ms. Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Ms. Vielhauer:

Thank you for your letter dated May 24, 2006, and the accompanying prevention of significant deterioration (PSD) preliminary determination and draft PSD permit for a proposed modification of the Hillsborough County Resource Recovery Facility. The proposed modification consists of adding a fourth municipal waste combustor (Unit 4).

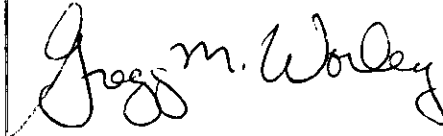
We first wish to commend the Florida Department of Environmental Protection (FDEP) on the thoroughness of its technical evaluation for this project. Our comments on the draft permit package are as follows. The word "we" in these comments refers to the Region 4 office of the U.S. Environmental Protection Agency (EPA).

1. The preliminary determination does not contain a specific acknowledgement of fine particulate matter ($PM_{2.5}$) as a pollutant that will be emitted from Unit 4. Although EPA has not yet issued $PM_{2.5}$ new source review (NSR) implementation rules, $PM_{2.5}$ is a regulated NSR pollutant because it is subject to national ambient air quality standards. We recommend that FDEP acknowledge $PM_{2.5}$ as a regulated NSR pollutant in the final determination. As part of this acknowledgement, you could comment that PM_{10} is being used as a surrogate for $PM_{2.5}$ and that the particulate matter emissions controls proposed for this project are appropriate for control of fine particles.
2. We are unable to tell if consideration was given to the possibility of condensible particle emissions from Unit 4. The test method specified for particulate matter emissions in Condition 23 of the draft permit is EPA Method 5 which does not measure condensibles. Since the project narrowly avoided PSD review for PM_{10} , any particulate component not included in the PM_{10} emissions estimate could be important. We suggest that the final permit include a requirement for a one-time test of condensible emissions to assess whether such emissions need to be considered further for Unit 4.

3. The tabular emissions limits summary in Condition 14 of the draft permit for sulfur dioxide and hydrogen chloride includes limits in terms of parts per million or percent reduction, with the following footnote: "Whichever standard is less stringent." Similarly, the emissions limits for mercury include limits in micrograms per dry standard cubic meter with the same footnote. The footnote is not assigned, however, to the listed pounds-per-hour emissions rates for these three pollutants. Furthermore, the text description of the limits is not altogether consistent with the tabular listings. For example, the text description of the sulfur dioxide limits in Condition 17 is "shall exceed neither 26 ppmvd nor 19.2 lb/hr on a 24-hr daily geometric mean, or an emissions reduction of 80 percent shall be achieved." Please provide an explanation of how the emissions limits for sulfur dioxide, hydrogen chloride, and mercury are to be interpreted. Specifically, does compliance with the percent reduction requirements supersede compliance with all other limits?

If you have any questions concerning the comments in this letter, please call Jim Little at 404-562-9118.

Sincerely,



Gregg M. Worley
Chief
Air Permits Section