

Sheplak, Scott

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From: Gorrie, Jason [GorrieJM@CDM.com]
Sent: Friday, June 23, 2006 3:11 PM
To: Sheplak, Scott
Cc: Treshler, Joseph; David Dee; Jay LaVia; Strobridge, Daniel
Subject: Hillsborough Unit 4
Attachments: Comments on p2 5 6-23-06.pdf

Scott:

We overnighted additional comments to your attention yesterday. An integral part of those comments is an 8 page letter prepared by Covanta which is addressed to Tom Smith and appended to our letter. When you get a chance, please confirm that you received our additional comments as well as Covanta's comments that were appended to our letter.

On a related matter, the attached letter contains additional comments prepared by Covanta that address the issues raised in EPA's comments dated 6/20/06. Thanks for all of your help on this.

Jason

<<Comments on p2 5 6-23-06.pdf>>



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June 23, 2006

Mr. Thomas Smith, Manager
Hillsborough County
Department of Solid Waste
PO Box 1110
Tampa, FL 33601

Reference: DEP File No. 0570261-007-AC (PSD-FL-369, PA 82-19A)

Dear Tom:

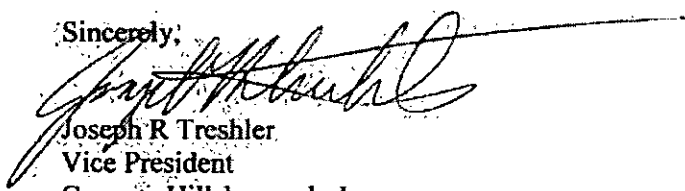
Yesterday afternoon we received an electronic copy of a fax from FLDEP advancing EPA's comments on the FLDEP Draft Permit for the Hillsborough Resource Recovery Facility Expansion Project. This EPA letter includes several significant statements regarding PM 10, PM 2.5 and condensibles.

This is an evolving issue nationwide due to EPA having recently created a new National Ambient Air Quality Standard (NAAQS) for Fine Particulate (PM 2.5). The issue is so new that the EPA has not finalized an implementation rule that would enable affected states to create individual State Implementation Plan for such. Since Florida does not currently have any non-attainment areas for PM 2.5 we do not believe Florida will be directly affected.

We are attaching a set of brief comments to meet the deadline for comments on the Draft Permit. We believe these comments are best submitted by the County.

Please call with any questions so that we can meet this tight schedule.

Sincerely,


Joseph R Treshler
Vice President
Covanta Hillsborough, Inc.

cc. Jason Gorrie CDM
Dan Strobridge CDM
Brian Bahor Covanta Energy

Comments on the EPA Letter Dated June 20, 2006
To FLDEP Regarding the Hillsborough Draft Permit

There are a variety of reasons why the Final Permit for the Hillsborough Expansion should not include an enforceable limit for fine particulate (PM 2.5) including:

- Per the EPA letter – there is not an existing set of NSR implementation rules for PM 2.5.
- No the test method for PM 2.5 has been validated at a municipal waste combustor, a regulatory requirement set forth in Section 129 of the CAAA of 1990.
- In addition to the current EPA method for determining condensable particulate (EPA Method 202) not being validated at a MWC – the EPA's own report ((EPA 450/4-90-012) concludes that "the method may not be applicable at sources that contain high levels of ammonia (e.g. when ammonia is used as a control technique).
- The test method promotes double counting of certain pollutants and its accuracy and reliability with others is uncertain due to the above point about ammonia interference.

Additional information on these issues is provide below however we respectfully request the department to recognize that the scope and detail of these comments is limited due to the limited comment time.

Validation requirement of Section 129

Section 129 Solid Waste Combustion, Article (c) (3), requires that test methods and procedures to be validated on solid waste incineration units. This has not been done to our knowledge and more specifically, it has not been done at a modern MWC equipped with SNCR where there will be ammonia slip and interference.

Double Counting of EPA Method 202

EPA Method 202 employs three impingers that absorb water soluble emissions including HCl, NH₃ and SO₂. Each of these three pollutant is already being regulated by the permit with HCl and SO₂ being regulated at levels equal to or more stringent than EPA's recent MACT determination for large MWCs. Double counting of a pollutant in both its gas phase and also as a potential condensable is not equitable, fair or representative of what really happens in the atmosphere. These pollutants cannot exist in two phases at the same time – its one r the other. Due to the uncertainties of the method and the fact that there is not a final implementation rule – it is not appropriate to establish a limit.

Exclusions in EPA Method 202

EPA Method 202 does not require inclusion of ammonium chloride as a condensable particulate. This exclusion appears to be due to several reasons including: i) ammonia is being used to reduce NO_x, a primary precursor to ambient PM 2.5 whereas the resulting ammonia slip is present in relative minor amounts compared to the amount of NO_x removed, ii) the double counting of NH₃ and HCl. In either case – there is an exclusion that would apply.

Pseudo Particulate

EPA Method 202 includes provisions for nitrogen purging to prevent the formation of artificial condensable particulate matter such as ammonium sulfate. We are not aware of any verification testing at a MWC where the effectiveness of this purging has been demonstrated. If it is not effective – the test would yield significant false positive amounts of condensable particulate matter.