

Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

Certified Mail -- Return Receipt Requested

May 26, 2006

Mr. Barry M. Boldissar  
Director  
Solid Waste Management Department  
Hillsborough County  
P.O. Box 1110  
Tampa, Florida 33601

Re: DRAFT Title V Air Operation Permit Renewal No. **0570261-006-AV**  
Draft Air Construction Permit No. **0570261-008-AC**  
**Hillsborough County Resource Recovery Facility**

Dear Mr. Boldissar:

We have received and reviewed your recent response to our letter requesting additional information relative to your air construction and Title V permit renewal applications. However, we have deemed your applications *still incomplete* because of the following outstanding issues:

1. Included in this letter is a listing of a number of the permit's specific conditions followed by the corresponding NSPS (40 CFR 60 Subpart Cb) requirements. Please verify that the limits (noted in italics) are equal to or less stringent than the NSPS values. Also, it appears that the permit limit for mercury is more stringent, and therefore a compliance assurance monitoring (CAM) plan applicability analysis is required for this pollutant.

### Particulate Matter

**C.15.** The emission limit for particulate matter contained in the gases discharged to the atmosphere from each MWC unit is 27 milligrams per dry standard cubic meter *or 0.012 grain per dry standard cubic foot, corrected to 7 percent oxygen (equivalent to 0.024 lb/MMBtu, heat input and 4.1 lbs/hr) and 17.96 tons/yr.*

[40 CFR 60.33b(a)(1)(i) and PSD-FL-121(C)]

*(i) The emission limit for particulate matter contained in the gases discharged to the atmosphere from a designated facility is 27 milligrams per dry standard cubic meter, corrected to 7 percent oxygen.*

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### Cadmium

C.17. The emission limit for cadmium contained in the gases discharged to the atmosphere from each MWC unit is 0.040 milligrams per dry standard cubic meter, corrected to 7 percent oxygen (*equivalent to 3.47E-05 lb/MMBtu, heat input and 6.00E-03 lb/hr and 0.026 ton/yr.*

[40 CFR 60.33b(a)(2)(i) and PSD-FL-121(C)]

*(i) The emission limit for cadmium contained in the gases discharged to the atmosphere from a designated facility is 0.040 milligrams per dry standard cubic meter, corrected to 7 percent oxygen.*

### Mercury

C.18. The emission limit for mercury contained in the gases discharged to the atmosphere from each MWC unit is 0.070 milligrams per dry standard cubic meter or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent (*equivalent to 1.17E-04 lb/MMBtu, heat input or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent and 0.020 lb/hr or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent) and 0.087 ton/yr.*

[40 CFR 60.33b(a)(3); Rule 62-296.416(3)(a)1., F.A.C.; and, PSD-FL-121(C)]

*(3) For approval, a State plan shall include emission limits for mercury at least as protective as the emission limits specified in this paragraph. The emission limit for mercury contained in the gases discharged to the atmosphere from a designated facility is 0.080 milligrams per dry standard cubic meter or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent.*

### Lead

C.22. The emission limit for lead contained in the gases discharged to the atmosphere from each MWC unit is 0.44 milligrams per dry standard cubic meter, corrected to 7 percent oxygen (*equivalent to 3.81E-04 lb/MMBtu, heat input and 0.065 lb/hr and 0.288 ton/yr.*

[40 CFR 60.33b(a)(4) and PSD-FL-121(C)]

*(4) For approval, a State plan shall be submitted by August 25, 1998 and shall include an emission limit for lead at least as protective as the emission limit for lead specified in this paragraph. The emission limit for lead contained in the gases discharged to the atmosphere from a designated facility is 0.44 milligrams per dry standard cubic meter, corrected to 7 percent oxygen.*

### Hydrogen Chloride

C.24. The emission limit for hydrogen chloride contained in the gases discharged to the atmosphere from each MWC unit is 29 parts per million by volume or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent (*0.099 lb/MMBtu*, heat input or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent *and 17.00 lbs/hr* or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent) *and 74.43 tons/yr.* [40 CFR 60.33b(b)(3)(ii) and PSD-FL-121(C)]

*(ii) The emission limit for hydrogen chloride contained in the gases discharged to the atmosphere from a designated facility is 29 parts per million by volume or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent.*

### Dioxins/Furans

C.25. The emission limit for dioxins/furans contained in the gases discharged to the atmosphere from each MWC unit that do not employ an electrostatic precipitator-based emission control system is 30 nanograms per dry standard cubic meter (total mass), corrected to 7 percent oxygen (*equivalent to 2.60E-08 lb/MMBtu, heat input and 4.5E-06 lb/hr*) *and 1.96E-05 ton/yr.* [40 CFR 60.33b(c)(1)(ii) and PSD-FL-121(C)]

*(1) For approval, a State plan shall include an emission limit for dioxins/furans contained in the gases discharged to the atmosphere from a designated facility at least as protective as the emission limit for dioxins/furans specified in either paragraph (c)(1)(i) or (c)(1)(ii) of this section, as applicable.*

*(i) The emission limit for designated facilities that employ an electrostatic precipitator-based emission control system is 60 nanograms per dry standard cubic meter (total mass), corrected to 7 percent oxygen.*

*(ii) The emission limit for designated facilities that do not employ an electrostatic precipitator-based emission control system is 30 nanograms per dry standard cubic meter (total mass), corrected to 7 percent oxygen.*

When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Mr. Barry M. Boldissar  
May 26, 2006  
Page 4 of 4

Sincerely,

A handwritten signature in cursive script, appearing to read "A A Linero".

A. A. Linero, P.E.  
Program Administrator  
Permitting South Section

Cc: Mara Nasca, Southwest District Office  
Jason M. Gorrie, P.E., CDM, 1715 North West Shore Blvd., Suite 250,  
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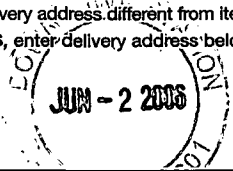
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