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BUREAU OF AIR REGULATION

August 18, 2009

Mr. Jeffery F. Koerner, Administrator
Florida Department of Environmental Protection
New Source Review Section
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Draft PSD Permit Revision Wet Dust Collection System
Hillsborough County Resource Recovery Facility
Project No. 0570261-010-AC (PSD-FL-369B)

Dear Mr. Koerner:

On behalf of Hillsborough County Solid Waste Management Department, CDM is providing the following comments on the draft PSD-FL-369B permit revision, received August 11, 2009. The following changes are recommended for the final PSD permit:

General In PSD-FL-369B, the Emission Unit Description for Emission Unit (EU) ID No. 100 is "ash handling building," and in Permit No. 0570261-006-AV, the Emission Unit Description for EU 100 is "ash building and handling system. With the addition of the Whirl Wet dust collector, the potential emissions from the ash handling building will be addressed by both the Whirl Wet dust collector as well as the existing ash building baghouse. It is recommended that the permit identify the ash building baghouse and the wet dust collector as two separate emission units with unique EU ID numbers and specific emission unit descriptions.

Section 3C The proposed unit is referenced as a wet scrubber in Sections 3C.3, 3C.5a, 3C.5b, 3C.8, and 3C.9. The proposed unit fundamentally operates very different from a conventional wet scrubber. Therefore, the proposed unit should be referenced as a wet dust collector rather than a wet scrubber.

The existing dolomitic lime silo as permitted in 0570261-006-AV (as EU ID No. 106) will be used to provide lime for Units 1 to 4. Because of this, the proposed dolomitic lime silo dedicated for Unit 4 (EU ID No. 109) was not installed as part of the expansion construction project and should be removed from the permit. Additionally, the existing silo (EU ID No. 106) is now located inside of the expanded air pollution control (APC) building and is no longer considered an emission unit, since the emission point is located within a fully enclosed



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building. The application for Title V permit will reflect this change in status for EU ID No. 106.

Section 3C.3 Unlike conventional scrubbers that use a constant flow of water, the wet dust collector utilizes a constant level of water to remove particulate. Makeup water is automatically supplied to offset evaporative water losses and maintain a constant water level. A Dwyer magnehelic pressure gauge/switch is used to control the water level in the unit and measure the differential pressure across the unit. The wet dust collector is designed to operate at a differential pressure of 8.0 ± 0.5 " wc. The water level, not the flow of makeup water is critical to the operation of the unit. Therefore, the requirement for the flow device is requested to be removed from the permit.

A particle size distribution analysis is probably not feasible based on the very low loading measured during recent air testing conducted on June 9, 2009. Approximately 0.9 mg of particulate was retained on the filter. This small amount of particulate is not sufficient to discern with any reasonable probability the particle size distribution. The conservative conclusion reached from the data obtained on June 9 was that the inlet particulate loading was very low and that the Whirl-Wet device would control particulate emissions to less than 1 ton/year. Accordingly, we respectfully request that the permit requirement to conduct additional inlet sampling be deleted.

Section 3C.5b Please provide the basis for the 0.67 tons/year limit.

Section 3C.9 The wet dust collector is equipped with high and low level alarms. These alarms provide the best means to troubleshoot any problems associated with the unit. The recording of the system differential pressure on a routine basis does not provide the best means to troubleshoot the unit. As previously mentioned, the water level, not the water flow, is critical to the operation of the unit. Therefore we request that the requirement to routinely measure the makeup water and differential pressure be removed from the permit.





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Please consider the aforementioned changes to the draft PSD permit. If you have any questions, please contact Robert Velasco at (813) 281-2900, if you have any questions.

Sincerely,

William R. Crellin, P.E.
Project Manager
Camp Dresser & McKee Inc.

cc: DEP (4 copies)
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The seal certifies that the engineering calculations shown herein provide reasonable assurances of achieving the applicable requirements of the Air Construction Permit/Title V permit renewal

