



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 2, 2009

Electronic Mail – Received Receipt Requested

Barry M. Boldissar
CDM
1715 North Westshore Boulevard, Suite 875
Tampa, FL 33607

Re: Request for Additional Information
Project No. 0570261-010-AC (PSD-FL-369(B))
Hillsborough County Resource Recovery Facility
Wet Dust Collection System

Dear Mr. Boldissar:

On February 12, 2009, we received your application and sufficient fee for a modification of an air construction permit No. 0570261-009-AC, which requests a new air pollution control system in the new portion of the expanded ash handling building (EU-100) at Hillsborough County Resource Recovery Facility. The facility is located in Hillsborough County at 350 N. Falkenburg Road in Tampa, Florida. The application indicates that the project is subject to general preconstruction review pursuant to Rule 62-212.300 of the Florida Administrative Code (F.A.C.). The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. In 2007, two permits were issued: Permit 0570261-009-AC modifying the NO_x control equipment; and Permit 0570261-008-AC implementing an hourly averaging method to calculate carbon mass feed rate levels. On October 3, 2006, the Department issued a Final Permit 0570261-007-AC (PSD-FL-369) to construct a nominal 600 tons per day municipal waste combustor designated as Unit 4. The permit included an expansion to the existing ash building to provide sufficient residue and ferrous storage for all units. However, during construction it was determined that additional ventilation measures are required to meet the 2004 Florida Building Codes. Therefore, a minor modification to Emissions Unit 100 (Ash Handling) to include a new air pollution control system is proposed. The application indicates that the additional ventilation will exhaust through a new wet dust collection system that is designed to meet a 0.015 grains/acf emission limit at a nominal flow rate of 7,000 acfm. Based on the particulate matter (PM) emission rate and full operation at 8,760 hours per year, the potential emission estimate will increase 0.9 lb/hour and 3.9 tons per year (TPY) in addition to the existing baghouse required for the expansion. Is this an accurate characterization? Please comment.
2. This project is part of the overall Unit 4 project (0570261-007-AC). The original application submitted for this project stated that the estimated annual emission rates for PM/PM₁₀/MWC Metals is 25.1 TPY and would trigger preconstruction review for the Prevention of Significant Deterioration (PSD) of air quality. The PSD significant emission threshold for total PM is 25 TPY, PM₁₀ is 15 TPY, and MWC-Metals is 15 TPY. The Technical Evaluation and Preliminary Determination for this project depicted a reduction in the potential

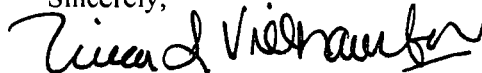
REQUEST FOR ADDITIONAL INFORMATION

annual emission rates to less than 24 TPY for total PM and 14.6 TPY for both PM₁₀ and MWC-Metals, which did not trigger PSD review. However, the proposed modification would put the estimated emission rates to 27.9 TPY for total PM, 18.5 TPY for both PM₁₀ and MWC-Metals, which would trigger PSD applicability. If subject to PSD preconstruction review for PM/PM₁₀/MWC Metals please provide your proposed BACT emissions and a revised air quality analysis. If the final design of the installed equipment indicates emissions will be lower, please identify the new emission rates and a revised PSD applicability analysis for PM/PM₁₀/MWC Metals.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction review); and 62-212.400 (Preventions of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Tammy McWade, at 850/488-1906 or Jeff Koerner.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section
850/921-9536

This letter was sent to the following people by electronic mail with received receipt requested.

Barry M. Boldissar, Hillsborough County DSWM (boldissarb@Hillsboroughcounty.org)
Glenn Hoag, Covanta Hillsborough, Inc. (ghoag@cavantaenergy.com)
Jason Gorrie, CDM (gorriejm@cdm.com)
William Crellin, Jr., CDM (crellinwr@cdm.com)
Robert A. Velasco, P.E., BCEE, CDM (velascora@cdm.com)
Cindy Zhang-Torres, DEP Southwest District Office (Cindy.Zhang-Torres@dep.state.fl.us)
Dianna Lee, Hillsborough County EPC (lee@epchc.org)
Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

JFK/ttm

Livingston, Sylvia

From: Barry Boldissar [BoldissarB@HillsboroughCounty.ORG]
Sent: Thursday, March 12, 2009 1:37 PM
To: Livingston, Sylvia
Cc: ghoag@cavantaenergy.com; crellinwr@cdm.com; gorriejm@cdm.com; velascora@cdm.com; Zhang-Torres; Walker, Elizabeth (AIR); Koerner, Jeff; Halpin, Mike; Gibson, Victoria; abrams.heather@epa.gov; forney.kathleen@epa.gov; Lee@epchc.org
Subject: Re: RAI -0570261-010-AC/PSD-FL-369B (Hillsborough County Resouce Recovery Facility)

I have received the above referenced document.

Barry M. Boldissar, Director
Solid Waste Management Department
Hillsborough County, FL 33602
Tel (813) 276-2900
Fax (813) 276-2965
BoldissarB@hillsboroughcounty.org

>>> "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us> 3/2/2009
>>> 4:30 PM >>>
Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame.
Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <
<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston

Bureau of Air Regulation

Livingston, Sylvia

From: Hoag, Glenn [GHoag@CovantaEnergy.com]
Sent: Thursday, March 12, 2009 1:11 PM
To: Livingston, Sylvia
Subject: RE: RAI -0570261-010-AC/PSD-FL-369B (Hillsborough County Resouce Recovery Facility)

Confirming Receipt.
gmh

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, March 12, 2009 9:10 AM
To: boldissarb@hillsboroughcounty.org
Cc: Hoag, Glenn
Subject: FW: RAI -0570261-010-AC/PSD-FL-369B (Hillsborough County Resouce Recovery Facility)

We have not received confirmation that you were able to access the documents attached to this March 2nd e-mail. Please confirm receipt by opening the attachment and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Livingston, Sylvia
Sent: Monday, March 02, 2009 4:31 PM
To: 'boldissarb@hillsboroughcounty.org'
Cc: 'ghoag@cavantaenergy.com'; 'gorriejm@cdm.com'; 'crellinwr@cdm.com'; 'velascora@cdm.com'; Zhang-Torres; 'Lee@epchc.org'; Halpin, Mike; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Walker, Elizabeth (AIR); Koerner, Jeff
Subject: RAI -0570261-010-AC/PSD-FL-369B (Hillsborough County Resouce Recovery Facility)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting

Livingston, Sylvia

From: Velasco, Robert [VelascoRA@cdm.com]
Sent: Friday, March 06, 2009 3:26 PM
To: Livingston, Sylvia
Subject: RE: RAI -0570261-010-AC/PSD-FL-369B (Hillsborough County Resouce Recovery Facility)

Received

Best Regards,

Robert A. Velasco P.E. BCEE
Project Manager
CDM
1715 North Westshore Blvd., Suite 875
Tampa, Florida 33607
Tel: (813) 281-2900
Tel: (813) 262-8868 (direct)
Fax: (813) 288-8787
VelascoRA@cdm.com

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Monday, March 02, 2009 4:31 PM
To: boldissarb@hillsboroughcounty.org
Cc: ghoag@cavantaenergy.com; Gorrie, Jason; Crellin, William; Velasco, Robert; Zhang-Torres; Lee@epchc.org; Halpin, Mike; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Walker, Elizabeth (AIR); Koerner, Jeff
Subject: RAI -0570261-010-AC/PSD-FL-369B (Hillsborough County Resouce Recovery Facility)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506