



# 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

July 6, 2010

*Sent via Electronic Mail - Read Receipt Requested*

[boldissarb@hillsboroughcounty.org](mailto:boldissarb@hillsboroughcounty.org)

Mr. Barry M. Boldissar  
Director  
Hillsborough County  
Solid Waste Management Department  
601 E. Kennedy Boulevard  
Tampa, Florida 33602

Re: Additional Information, File Number 0570261-012-AV  
Title V Air Operation Permit Revision Application  
Hillsborough County Resource Recovery Facility

Dear Mr. Boldissar:

On June 9, 2010, the Department received a Title V air operation permit revision application for the subject facility via Electronic Permit Submittal and Processing System (EPSAP). The Hillsborough County Resource Recovery Facility is located at 350 North Falkenburg Road, Tampa in Hillsborough County, Florida.

In order to continue processing the application, the Department needs the additional information requested below. Should a response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

**A. Initial Title V Air Operation Permit for New Municipal Waste Combustor (MWC) Unit 4, Emissions Unit Identification Number (E.U. ID No.) -107, and Associated Equipment from Permit No. PSD-FL-369 as amended**

1. Permit No. PSD-FL-369 was originally issued on 10/02/2006 and subsequently amended by PSD-FL-369A on 09/07/2007 and PSD-FL-369B on 09/30/2009. Have all of the terms and conditions of Permit No. PSD-FL-369 as amended, been satisfied?
2. Did the new MWC Unit 4 demonstrate compliance with the air pollutant standards and limitations contained in the specific condition numbers 3.B.14. through 3.B.21. of Permit No. PSD-FL-369 as amended?
3. What was the date that the new MWC Unit 4 commenced operations?
4. Was the information required by 40 Code of Federal Regulations (CFR) 60.59b(f), e.g., maximum demonstrated unit load, maximum demonstrated inlet temperature to baghouse, average carbon mass feed rate, etc., provided in the initial compliance (performance) test report(s)? What were the values?
5. Hydrogen Chloride (HCl) Emissions Testing: Specific condition 3.B.23. of Permit No. PSD-FL-369 as amended, requires an EPA Method 26 or 26A for the determination of HCl emissions. In the requested changes document (copy enclosed) it was mentioned that "the Department has previously approved a modification to the Method 26/26A train when sampling HCl emissions." How was the approval done? If in writing, please provide a copy.
6. Steam Production Rates and Capacity: What was the steam production rate in lbs./hour during the initial compliance tests? Where the initial compliance tests conducted within 90-100% of capacity as required by specific condition 3.B.24. of Permit No. PSD-FL-369 as amended?

7. Where there any other initial emission performance tests conducted to satisfy vendor guarantees as mentioned in specific condition 3.B.25. of Permit No. PSD-FL-369 as amended?
8. Mercury (Hg) Continuous Emissions Monitoring System (CEMS): Specific condition 3.B.35. of Permit No. PSD-FL-369 as amended, requires the installation and certification of a Hg CEMS within 24 months of MWC Unit 4 commencing operation. What is the status of the procurement and installation of the Hg CEMS?
9. Compliance Assurance Monitoring (CAM) Applicability: The U.S. EPA promulgated and the State of Florida adopted the CAM federal regulation, 40 CFR 64, in Rule 62-204.800, F.A.C. CAM may apply to air pollutant for which federal standards were promulgated pre-1990 (see the CAM federal regulation, for the complete applicability). CAM does not apply to post-1990 federal standards for certain air pollutant standards.

CAM applicability has been addressed and described in previous permitting actions for MWC Units 1-3 (see the Statement of Basis and the Subsection III.C., Emissions Unit Description in Permit 0570261-006-AV). In this permitting action, the initial Title V air operation permit for MWC Unit 4, the CAM Plan in the EPSAP was not checked as being applicable {see Section III. Emissions Unit Information, I. Emissions Unit Additional Information, Additional Requirements for Title V Air Operation Permit Applications, Field 2., Compliance Assurance Monitoring Plan}.

- a. Please address CAM applicability for each air pollutant standard/limit for the new MWC Unit 4. Specifically, address each air pollutant standard/limit contained in specific condition numbers 3.B.14. through 3.B.21. for: nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), hydrogen chloride (HCl), particulate matter (PM/PM<sub>10</sub>), lead (Pb), mercury (Hg), cadmium (Cd), dioxins/furans and ammonia slip. If CAM turns out to be applicable to MWC Unit 4, please provide a Microsoft® Word version of the proposed CAM Plan.
10. Stack Gas Flow Rate Information: The stack gas flow rate information for the new MWC Unit 4 flue was blank in the EPSAP {see Section III. Emissions Unit Information, C. Emission Point (Stack/Vent) Information, Fields 9. and 11.}. Please provide both the acfm and dscfm values.
11. Air Pollution Control Systems: The control equipment fields in the EPSAP were blank {see Section III. Emissions Unit Information, A. General Emissions Unit Information, Emissions Unit Control Equipment.}. Please provide the manufacturer names, model numbers, etc., for the installed air pollution control equipment on the new MWC Unit 4, specifically for: (a) the strategic combustion air management system (Covanta low NO<sub>x</sub> (LN<sup>TM</sup>) system) or flue gas recirculation system; (b) selective non-catalytic reduction system; (c) spray dryer with lime injection; (d) activated carbon injection system; and, (e) fabric filter baghouse.
12. Risk Management Plan (RMP): In the EPSAP permit application submitted, the RMP field is blank {see Section II. Facility Information, C. Facility Additional Information, Additional Requirements for Title V Air Operation Permit Applications, Field 5. - Verification of Risk Management Plan Submission to EPA: (required for revision applications)}. Was an RMP required? If so, has it been submitted?
13. Pebble Lime Storage Silo, Activated Carbon Storage Silo and Expanded Ash Handling Building with Wet Scrubbing System, E.U. ID Nos. -108, -110 and -112: As part of the PSD-FL-369 project, baghouses and a wet dust collector (scrubber) were installed.
  - a. Operation and Maintenance (O&M) Plans: Where the O&M plans for each baghouse and the wet scrubber submitted to the compliance authority as required by specific condition 3.C.8. of Permit No. PSD-FL-369 as amended? Please provide a copy of each.
  - b. Design Specifications: Specific condition 3.C.3. of Permit No. PSD-FL-369 as amended, requires the wet scrubber to meet certain design specifications. Does the installed wet scrubber meet these design specifications?

- c. Scrubber Design  $\Delta$  (delta) Pressure (P): One of the requested changes was to change the  $\Delta p$  for the scrubber design cited in the permit from: 8"  $\pm$  0.5" wc (water column) to: 8"  $\pm$  2" wc. Thank you for providing a copy of the previously submitted notification dated February 5, 2010 to the Department's SWD Office (copy enclosed). I was unable to locate the wet scrubber's  $\Delta p$  during the initial compliance test performed on December 19, 2009. At what  $\Delta p$  was the wet scrubber operating during the initial compliance test?
14. Cooling Tower, E.U. ID No. -111: As part of the PSD-FL-369 project, a new cooling tower was installed.
- Was specific condition 3.D.2. of Permit No. PSD-FL-369 as amended, satisfied?
  - Does the cooling tower use chromium-based water treatment chemicals?
15. New Applicable Requirements - Federal Regulation Amendments, New Municipal Waste Combustors (MWC) 40 Code of Federal Regulations (CFR) 60, Subparts Eb & Cb: U.S. EPA recently amended 40 CFR 60, Subparts Eb & Cb. The amendments had been promulgated by U.S. EPA on May 10, 2006, and were adopted by reference into the Florida rules on May 31, 2007, at Rule 62-204.800(8)(b)7., Florida Administrative Code (F.A.C.) and Rule 62-204.800(9)(b), F.A.C.

Note: The new emission standards/limits took effect April 28, 2009 (compliance deadline) for all of the amendments.

The permit for the new MWC Unit 4, PSD-FL-369 as amended, references these amendments in Appendix Eb. In the requested changes, you requested the May 10, 2006 federal amendment changes to be integrated directly into each respective affected specific condition of the permit.

- Do the amendments contain any new applicable requirements for the MWC Unit 4? Please provide any written materials highlighting the changes as this can be useful in revising the specific conditions of the permit and can be useful for the facility in making the transition to any new requirements.
- Please provide a list of the specific applicable requirements from 40 CFR 60, Subparts Eb & Cb that apply to the MWC Unit 4.
- Has compliance with all of the May 10, 2006, federal regulation amendments been demonstrated? Where any modifications to the MWC Unit 4 necessary to come into compliance with the federal amendment changes?

**B. Title V Air Operation Permit Revision for Existing MWC Units 1-3, E.U. ID No. -001 - -003, Permit No. 0570261-006-AV**

- Hydrogen Chloride (HCl) Emissions Testing: Specific condition 3.C.42. of Permit No. 0570261-006-AV, requires an EPA Method 26 or 26A for the determination of HCl emissions. In the requested changes document it was mentioned that the Department has approved a modification to the Method 26/26A train when sampling HCl emissions per Errin Pichard's 01/08/2010 e-mail. Please provide a copy of the referenced e-mail.
- New Applicable Requirements - Federal Regulation Amendments, Existing Municipal Waste Combustors (MWC) 40 Code of Federal Regulations (CFR) 60, Subparts Eb & Cb: U.S. EPA recently amended 40 CFR 60, Subparts Eb & Cb. The amendments had been promulgated by U.S. EPA on May 10, 2006, and were adopted by reference into the Florida rules on May 31, 2007, at Rule 62-204.800(8)(b)7., Florida Administrative Code (F.A.C.) and Rule 62-204.800(9)(b), F.A.C. Note certain exceptions were made in the State of Florida's adoption of 40 CFR 60, Subpart Cb in Rule 62-204.800(9)(b), F.A.C. {excerpts of the rule adoption with the exceptions are enclosed}.

As part of these amendments, the emission standards/limits in particular for lead (Pb), cadmium (Cd), mercury (Hg) and particulate matter (PM) were lowered for 'existing' units (Cb units). The Pb emission

limit was changed from: 0.44 milligrams/dscm to: 0.400 milligrams/dscm. The Cd emission limit was changed from: 0.04 milligrams/dscm to: 0.035 milligrams/dscm. The Hg emission limit was lowered from: 70 micrograms/dscm to: 50 micrograms/dscm {note: Florida Rule 62-296.416, F.A.C. limits Hg to 70 micrograms/dscm}. The PM emission limit was changed from: 27 milligrams/dscm to: 25 milligrams/dscm. The amendments also changed test scheduling & frequency and provide an array of options for the use of new continuous emissions monitoring system (CEMS) technology for Hg, dioxin, multi-metal & hydrogen chloride (HCl) emissions.

Note: The new emission standards/limits took effect April 28, 2009 (compliance deadline) for all of the amendments.

The renewed permit, Permit No. 0570261-006-AV renewed for Units 1-3, effective May 29, 2007, does not contain the amendments. In the requested changes, you requested the May 10, 2006 federal amendment changes to be integrated directly into each respective affected specific condition of the permit.

- a. Do the amendments contain any new applicable requirements for Units 1-3? Please provide any written materials highlighting the changes as this can be useful in revising the specific conditions of the permit and can be useful for the facility in making the transition to any new requirements.
- b. Please provide a list of the specific applicable requirements from 40 CFR 60, Subparts Eb & Cb that apply to each respective emissions unit.
- c. Please prepare a chart(s) showing the emission standards/limits under Permit No. 0570261-006-AV vs. the new emission standards/limits under the amendments for Units 1-3.  
Please highlight the most stringent emission standard/limit for each pollutant in the chart(s).
- d. Where each emission standard/limit has been lowered, please provide the corresponding equivalent lbs/hour and tons per year (TPY) values.
- e. Has compliance with all of the May 10, 2006, federal regulation amendments been demonstrated? Where any modifications to Units 1-3 necessary to come into compliance with the federal amendment changes?

May 10, 2006, Federal Regulation Amendments for MWCs Note:

An inconsistency in the air pollutant test schedule window has been identified in the May 10, 2006, federal regulation amendments for MWCs. The language changed by U.S. EPA for air pollutant testing throughout the amendments is highlighted below with the new language underlined.

*... the owner or operator shall conduct a performance test for [air pollutant] on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests in each 5-year calendar period). ...*

U.S. EPA did not make the change to the test schedule window for HCl and fugitive ash emissions in the federal regulations.

On January 22, 2009, the Department received an e-mail from U.S. EPA confirming this as an error in the CFR. In the federal register, U.S. EPA clearly intended to make the testing schedule change apply to all air pollutants (see the May 10, 2006 federal register, page number 27326). U.S. EPA plans to correct this error as soon as possible. Until this error is corrected in the federal regulation, the testing schedule for fugitive ash and HCl emissions will be kept intact.

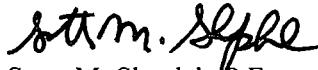
The Department will resume processing the application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. 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 responsible official (R.O.).

Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within **ninety (90)** days or provide a written request for an additional period of time to submit the information.

If you should have any questions, feel free to contact me by telephone at 850/921-9532 or by e-mail at [scott.sheplak@dep.state.fl.us](mailto:scott.sheplak@dep.state.fl.us).

Sincerely,



Scott M. Sheplak, P.E.  
DEP - Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399

Enclosures

- Notification dated February 5, 2010 to the Department's SWD Office re: West Dust Collector (Scrubber)
- Applicant's Requested Changes
- Excerpts of Rule 62-204.800, F.A.C.

copy to: Mr. Glenn Hoag, Covanta Hillsborough: [ghoag@covantaenergy.com](mailto:ghoag@covantaenergy.com)  
Mr. Jason Gorrie, P.E., Covanta: [jgorrie@covantaenergy.com](mailto:jgorrie@covantaenergy.com)  
Mr. Robert A. Velasco, P.E., CDM: [velascora@cdm.com](mailto:velascora@cdm.com)  
Ms. Diana M. Lee, P.E., EPCHC: [lee@epchc.org](mailto:lee@epchc.org)  
Ms. Cindy Zhang-Torres, P.E., DEP SWD: [zhang-torres@dep.state.fl.us](mailto:zhang-torres@dep.state.fl.us)  
Ms. Victoria Gibson, DEP BAR: [victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us) (for reading file)

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Wednesday, June 16, 2010 7:58 AM  
**To:** 'mhammond@swa.org'  
**Cc:** 'achattopadhyay@pirnie.com'; 'lrichter@pirnie.com'; 'jcohn@pirnie.com'; Anderson, Lennon; 'James\_Stormer@doh.state.fl.us'; 'abrams.heather@epa.gov'; 'krivo.stanley@epa.gov'; 'forney.kathleen@epa.gov'; 'dee\_morse@nps.gov'; 'john\_notar@nps.gov'; Bull, Robert; Gibson, Victoria; Walker, Elizabeth (AIR)  
**Subject:** RAI: Solid Waste Authority of Palm Beach County (0990234-017-AC/ PSD-FL-413)  
**Attachments:** RAI 0990234-017-AC\_061510.pdf

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).

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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvania

---

**From:** Livingston, Sylvania  
**Sent:** Wednesday, August 04, 2010 3:00 PM  
**To:** 'boldissarb@hillsboroughcounty.org'  
**Subject:** FW: Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)  
**Attachments:** RAI 0570261-012-AV.pdf; Applicant's Requested Changes.pdf; Excerpt of Rule 62-204 800, F A C as applying to MWCs.pdf; Notification dated February 5, 2010 to the SWD Office re wet scrubber.pdf

Dear Barry M. Baldissar:

We have not received confirmation that you were able to access the documents attached to this July 6th 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  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/488-0114  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

---

**From:** Livingston, Sylvania  
**Sent:** Tuesday, July 06, 2010 3:35 PM  
**To:** 'boldissarb@hillsboroughcounty.org'  
**Cc:** 'ghoag@covantaenergy.com'; 'jgorrie@covantaenergy.com'; 'velascora@cdm.com'; 'lee@epchc.org'; Zhang-Torres; Gibson, Victoria; Sheplak, Scott; Walker, Elizabeth (AIR); Friday, Barbara  
**Subject:** Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)

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Thank you,

## Livingston, Sylvia

---

**From:** Boldissar, Barry [BoldissarB@HillsboroughCounty.ORG]  
**Sent:** Monday, August 09, 2010 9:04 AM  
**To:** Livingston, Sylvia  
**Cc:** DeArmond, Douglas; Berry, Patricia; Snow, Chris  
**Subject:** RE: Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)  
**Attachments:** FW: Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV) - EXTENDED 2.77 MB

Good morning,

Per the below, this is confirmation that we were able to access the documents attached to your email of July 6. Any questions, please contact Doug DeArmond at 335-8673 or JoAnn Caride at 276-2970.

Thank you.

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Wednesday, August 04, 2010 3:00 PM  
**To:** 'boldissarb@hillsboroughcounty.org'  
**Subject:** FW: Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)

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Department of Environmental Protection  
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[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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Thank you,

Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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## Livingston, Sylvania

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**From:** Hoag, Glenn [GHoag@CovantaEnergy.com]  
**Sent:** Tuesday, July 06, 2010 3:45 PM  
**To:** Livingston, Sylvania  
**Subject:** RE: Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)

---

**Glenn M. Hoag**  
Facility Manager

## COVANTA ENERGY

*for a cleaner world*  
Covanta Hillsborough  
350 N. Falkenburg Road  
Tampa, FL 33619  
813.684.5688 ext. 3013 Fax: 813.684.7964

[www.CovantaHolding.com](http://www.CovantaHolding.com)

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**To:** boldissarb@hillsboroughcounty.org  
**Cc:** Hoag, Glenn; Gorrie, Jason; velascora@cdm.com; lee@epchc.org; Zhang-Torres; Gibson, Victoria; Sheplak, Scott; Walker, Elizabeth (AIR); Friday, Barbara  
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## Livingston, Sylvia

---

**From:** Gorrie, Jason [jgorrie@CovantaEnergy.com]  
**Sent:** Tuesday, July 06, 2010 4:23 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)

I have received the documents

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**From:** Livingston, Sylvia [Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Tuesday, July 06, 2010 3:34 PM  
**To:** boldissarb@hillsboroughcounty.org  
**Cc:** Hoag, Glenn; Gorrie, Jason; velascora@cdm.com; lee@epchc.org; Zhang-Torres; Gibson, Victoria; Sheplak, Scott; Walker, Elizabeth (AIR); Friday, Barbara  
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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<<http://survey.dep.state.fl.us/?refemail=Sylvia.Livingston@dep.state.fl.us>>. Thank you in advance for completing the survey.

## Livingston, Sylvia

---

**From:** Velasco, Robert [VelascoRA@cdm.com]  
**Sent:** Tuesday, July 06, 2010 3:54 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)

CDM has received the RAI comments.

Best Regards,

**Robert A. Velasco P.E. BCEE**  
Project Manager  
**CDM | Water Services Division**  
1715 North Westshore Blvd., Suite 875  
Tampa, Florida 33607  
Tel: (813) 262-8868 (direct)  
Fax: (813) 288-8787  
[VelascoRA@cdm.com](mailto:VelascoRA@cdm.com)  
[www.cdm.com](http://www.cdm.com)

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**Sent:** Tuesday, July 06, 2010 3:35 PM  
**To:** boldissarb@hillsboroughcounty.org  
**Cc:** ghoag@covantaenergy.com; jgorrie@covantaenergy.com; Velasco, Robert; lee@epchc.org; Zhang-Torres; Gibson, Victoria; Sheplak, Scott; Walker, Elizabeth (AIR); Friday, Barbara  
**Subject:** Request for Additional Information: Hillsborough County Resource Recovery Facility (0570261-012-AV)

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Thank you,

Sylvia Livingston  
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