



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

September 7, 2010

Sent via Electronic Mail - Read Receipt Requested

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 August 9, 2010, the Department received a response to the request for additional information. This Title V air operation permit revision application is for the subject facility and was received 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. **Steam Production Rates and Capacity:** Please explain the apparent conflict with the reported "maximum steam flow" shown in Tables 2. & 4. of "174,500 lbs./hour" and the "183,941 lbs./hour" shown in Table 3. of the response. What were the averaging periods for the reported steam flow values?
2. **Mercury (Hg) Continuous Emissions Monitoring System (CEMS):** Specific condition 3.B.35. of Permit No. PSD-FL-369 as amended, currently requires the installation and certification of a Hg CEMS within 24 months of MWC Unit 4's commencing operation.
 - a. The commercial operation date for Unit 4 was provided as "September 5, 2009" in the response. The current deadline for the installation and certification of a Hg CEMS is therefore **September 5, 2011**. As you indicated, the U.S. EPA subsequent to the issuance of the original PSD permit, PSD-FL-369 (issued on October 2, 2006) for Unit 4, vacated the Clean Air Mercury Rule (CAMR) on February 8, 2008. Is there a new timeline under which the EPA will re-promulgate CAMR?
 - b. The sorbent-based sampling system described in the response does not appear to meet the requirements of specific condition 3.B.35., requiring a Hg CEMS.
 - 1) The sorbent sampling system information provided for the American Supply Company Inc., Model HG-324K by you indicates the unit had been field tested in June/July 2006. Has there been more recent field testing?

2) The information provided for the American Supply Company Inc. Model HG-324K sorbent sampling system by you indicates the unit costs \$18,750 (2007 dollars). The cost for a sorbent sample is \$500. Are these prices valid for today (2010 dollars)?

c. Has a Hg CEMS been installed, certified and in operation on an MWC unit in the U.S.?

The JEA-Northside coal-fired power plant in Florida has installed and certified two Hg CEMS. These Hg CEMS began operating in March/June 2009. For more information on these Hg CEMS, see the following web link: <http://www.dep.state.fl.us/air/emission/apds/listpermits.asp>; Facility ID No. 0310045, projects -028-AV and -022-AC.

While the Hg CEMS issue is related to this permitting action, the inclusion of the new Unit 4 can be easily accomplished by simply incorporating the terms and conditions of PSD-FL-369B verbatim into the Title V permit. A review and approval of any proposed Hg emissions monitoring to satisfy specific condition 3.B.35. of Permit No. PSD-FL-369B may be appropriate. This can be pursued independent of this permitting action. The Department has Hg emissions monitoring expertise within the Emissions Monitoring Section here in Tallahassee. Mr. Syed Arif, P.E. is the Program Administrator of the Emissions Monitoring Section; he can be reached at 850/921-9580. It seems a meeting would be worthwhile to discuss this issue.

3. 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. The response provided some test data results.

a. Design Specifications: Specific condition 3.C.3. of Permit No. PSD-FL-369 as amended, requires the wet scrubber to meet certain design specifications. The design specifications from the permit are:

- “... a. 7000 actual cubic feet per minute;
- b. Approximately 40% control for submicron particles;
- c. 80% control for particles ≥ 1.0 micron;
- d. 95% control for particles ≥ 2.0 micron;
- e. 97% control for particles ≥ 3.0 micron;
- f. 98% control for particles ≥ 5.0 micron; and
- g. 99% control for particles ≥ 10.0 micron. ...”

Does the installed wet scrubber meet these design specifications?

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

C. Title V Air Operation Permit Revision This requested permitting action is for the inclusion of the new Unit 4, revising the current Title V air operation permit and for miscellaneous requested revisions to Units 1-3. New applicable requirements from NSPS 40 CFR 60, Subparts Eb & Cb were previously addressed.

1. New Applicable Requirements - Engines: Permit No. 0570261-006-AV, was effective on May 29, 2007. Several new federal regulations have been promulgated by U.S. EPA and adopted by the State of Florida. Some of these new federal regulations may be new applicable requirements applying to certain types of engines.

a. New Applicable Requirements - New Source Performance Standards (NSPS) Requirements from 40 Code of Federal Regulations (CFR) 60:

40 CFR 60 Subpart III also known as (a.k.a.) NSPS “4-I’s” or “CI-ICE”

U.S. EPA promulgated on July 11, 2006, the NSPS for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart III. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b), F.A.C.

Appendix I, List of Insignificant Emissions Units and/or Activities, attached to Permit No. 0570261-006-AV, lists two engines.

Are any of these engines regulated under this new NSPS?

If not, please provide key non-applicability descriptors to show that the engine is clearly not subject to these new NSPS, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, etc.

- b. New Applicable Requirements - National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements also known as (a.k.a) Maximum Available Control Technologies (MACT) from 40 CFR 63 Subpart ZZZZ:

40 CFR 63 Subpart ZZZZ a.k.a. MACT "4-Z's" or "RICE MACT"

U.S. EPA promulgated on February 24, 2004, the Reciprocating Internal Combustion Engines (RICE) MACT under 40 CFR 63 Subpart ZZZZ. This new MACT applies to new and existing engines at a Title V source that is a major source of hazardous air pollutants (HAP). Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(11)(b), F.A.C.

This facility is a major source of HAP. This new MACT may therefore apply. Are any of the previously mentioned engines above regulated under the RICE MACT?

If not, please provide key non-applicability descriptors to show that the engine is clearly not subject to the RICE MACT, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, e.g., compression ignition (CI), etc.

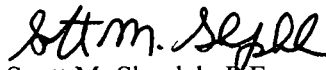
These new federal regulations along with fact sheets are posted on the following U.S. EPA web site:
<http://www.epa.gov/ttn/atw/combust/list.html>.

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.

Sincerely,



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

copy to: Mr. Glenn Hoag, Covanta Hillsborough: ghoag@covantaenergy.com
Mr. Jason Gorrie, P.E., Covanta: jgorrie@covantaenergy.com
Mr. William J. Crellin, Jr., P.E., CDM: crellinwr@cdm.com
Mr. Robert A. Velasco, P.E., CDM: velascora@cdm.com
Mr. Syed Arif, P.E., DEP BAMMS EM: syed.arif@dep.state.fl.us
Ms. Diana M. Lee, P.E., EPCHC: lee@epchc.org
Ms. Cindy Zhang-Torres, P.E., DEP SWD: zhang-torres@dep.state.fl.us
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

Friday, Barbara

To: boldissarb@hillsboroughcounty.org
Cc: ghoag@covantaenergy.com; jgorrie@CovantaEnergy.com; crellinwr@cdm.com; velascora@cdm.com; Arif, Syed; 'lee@epchc.org'; Zhang-Torres; Gibson, Victoria; Sheplak, Scott
Subject: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility
Attachments: BarryM.Boldissar0570261-012-AVAdditionalInformationHillsboroughRRF.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,

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

Friday, Barbara

From: Microsoft Exchange
To: 'boldissarb@hillsboroughcounty.org'
Sent: Tuesday, September 07, 2010 2:02 PM
Subject: Relayed: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'boldissarb@hillsboroughcounty.org'

Subject: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Hoag, Glenn [GHoag@CovantaEnergy.com]
To: Friday, Barbara
Sent: Tuesday, September 07, 2010 2:07 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:06:45 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gorrie, Jason [jgorrie@CovantaEnergy.com]
To: Friday, Barbara
Sent: Tuesday, September 07, 2010 2:06 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:05:52 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: crellinwr@cdm.com; velascora@cdm.com
Sent: Tuesday, September 07, 2010 2:02 PM
Subject: Relayed: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

crellinwr@cdm.com

velascora@cdm.com

Subject: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Crellin, William [CrellinWR@cdm.com]
Sent: Tuesday, September 07, 2010 2:54 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:53:42 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Velasco, Robert [VelascoRA@cdm.com]
Sent: Tuesday, September 07, 2010 2:03 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:02:51 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Velasco, Robert [VelascoRA@cdm.com]
Sent: Tuesday, September 07, 2010 2:25 PM
To: Friday, Barbara
Subject: RE: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

I have received this email.

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
www.cdm.com

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Tuesday, September 07, 2010 2:02 PM
To: boldissarb@hillsboroughcounty.org
Cc: ghoag@covantaenergy.com; jgorrie@CovantaEnergy.com; Crellin, William; Velasco, Robert; Arif, Syed; lee@epchc.org; Zhang-Torres; Gibson, Victoria; Sheplak, Scott
Subject: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

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Thank you,

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

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.

Friday, Barbara

From: Arif, Syed
To: Friday, Barbara
Sent: Tuesday, September 07, 2010 2:12 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:12:07 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: lee@epchc.org
Sent: Tuesday, September 07, 2010 2:02 PM
Subject: Relayed: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

lee@epchc.org

Subject: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Lee, Diana [Lee@epchc.org]
To: Friday, Barbara
Sent: Tuesday, September 07, 2010 3:34 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 3:34:10 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Zhang-Torres; Gibson, Victoria
Sent: Tuesday, September 07, 2010 2:02 PM
Subject: Delivered: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message has been delivered to the following recipients:

Zhang-Torres

Gibson, Victoria

Subject: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Tuesday, September 07, 2010 2:26 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:25:52 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
Sent: Tuesday, September 07, 2010 2:02 PM
To: Friday, Barbara
Subject: Out of Office: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Hi,

I am out of the office from 9/3 through and including 9/13. Please feel free to leave me a message and I will get back with you when I return.

Thank you.

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Tuesday, September 14, 2010 2:02 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 14, 2010 2:02:08 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Sheplak, Scott; Arif, Syed
Sent: Tuesday, September 07, 2010 2:02 PM
Subject: Delivered: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message has been delivered to the following recipients:

Sheplak, Scott

Arif, Syed

Subject: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Sheplak, Scott
To: Friday, Barbara
Sent: Tuesday, September 07, 2010 2:14 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:13:44 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Pruneda, Crystal [PrunedaC@HillsboroughCounty.ORG]
To: Friday, Barbara
Sent: Tuesday, September 07, 2010 2:32 PM
Subject: Read: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Your message was read on Tuesday, September 07, 2010 2:31:53 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Pruneda, Crystal [PrunedaC@HillsboroughCounty.ORG] on behalf of Boldissar, Barry [BoldissarB@HillsboroughCounty.ORG]
Sent: Tuesday, September 07, 2010 2:36 PM
To: Friday, Barbara
Subject: RE: Additional Information, File Number 0570261-012-AV - Hillsborough County Resource Recovery Facility

Received and can view the attached documents.

Barry Boldissar

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Tuesday, September 07, 2010 2:02 PM
To: Boldissar, Barry
Cc: ghoag@covantaenergy.com; jgorrie@CovantaEnergy.com; crellinwr@cdm.com; velascora@cdm.com; Arif, Syed; Lee, Diana; Zhang-Torres; Gibson, Victoria; Sheplak, Scott
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Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
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Tell us what matters to you! Visit www.hillsboroughcounty.org/budgetmatters and lend your voice to the budget discussion.