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SEP 23 2011

DIVISION OF AIR
RESOURCE MANAGEMENT

Scott M. Sheplak, PE
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Hillsborough County Resource Recovery Facility
Application for Title V Permit Renewal (ESAP Application # 2310-1)

Dear Mr. Sheplak:

This letter is written to confirm that the ESAP Application #22310-1, submitted to FDEP on June 8, 2010, was not only intended to include the new Unit No. 4 municipal waste combustor in the Resource Recovery Facility's Title V Permit, but also to renew the facility wide Title V Permit.

Since making that Application we have determined there are several other issues that we respectfully request to be considered in the Application;

1. The diesel powered engine that powers the fire pump should be added as an Emission Unit under the RICE standards. The Instant RICE software populated with data for this engine is attached.
2. We request that fluoride and beryllium be removed from the list of pollutants regulated. The Resource Recovery Facility does not combust beryllium containing wastes or fluoride containing wastes. Additionally Annual Compliance Tests since the start of Facility commercial operations in 1987 have shown either non-detectable levels of these 2 pollutants or trace amounts several orders of magnitude below the emission limitations.
3. The dolomitic lime storage silo, Emissions Unit No. 106, should be removed. This silo was totally enclosed within the new APC Building as a result of the Expansion project that added municipal waste combustor Unit No. 4.

We look forward to the Department's response.

Sincerely,

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

cc: Dan Strobridge (CDM)
Jason Gorrie (Covanta Energy)
Tyler Huffman (Covanta Energy)

Glenn Hoag (Covanta Energy)
Nate Johnson (Hillsborough County)



Instructions:

- Always answer the questions in order.
- Only orange colored cells should have an answer/choice in them. All others should be left blank.
- Follow the arrows until you have a big green arrow. When you get a big green arrow you are finished!
- The detailed results of the RICE will be on tabs ZZZZ or IIII or JJJJ of this worksheet.
- Contact Andrew Bass (andrew.bass@dep.state.fl.us) with any Errors/Suggestions about the Program.



Input

- Are you the Manufacturer or the Owner and Operator of the Fire Pump?	→	Owner and Operator
- Is the Fire Pump a temporary replacement unit and located at a stationary source for less than 1 year and has been properly certified as meeting the standards that would be applicable to such engine under the appropriate non-road engine provisions?	→	No
- Is your Fire Pump being tested at a stationary RICE test cell/stand?	→	No
- Does your facility have the potential to emit 10 or more tons/year of any single hazardous air pollutant or 25 or more tons/year of any combination of hazardous air pollutants?(Area or Major Source)	→	Yes
- What is the Brake HP (Hint: 1 HP = 0.7456 KW) of the stationary Fire Pump?	→	235 HP
<p>* A fire pump is considered to be reconstructed if it meets any of the following conditions; (1) The fixed capital cost of the new (after July 11, 2005) components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and (2) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act.</p>		
- When did you commence construction (date the Fire Pump is ordered by the owner or operator) or reconstruction on your stationary Fire Pump (ex. June 12, 2006 = 06/12/06)(All manufacturers use manufacture date)?	→	1/1/1986
- What is the date of manufacture of the Fire Pump?	→	1/1/1986
- What is the Fire Pumps displacement (l/cyl)(Hint:1 cc = 0.001 l & V# = # cylinders)(If engine is not a new compression ignition engine use 1 l/c, otherwise obtain information from applicant or manufacturer)	→	1.30 l/cyl

Emission Limitations	Operating Limitations	Fuel Requirements	Performance Test	Monitoring, Installation, Collection, Operation and Maintenance Requirements	Initial Compliance	Continuous Compliance	Notification Requirements	Recordkeeping Requirements	Reporting Requirements	General Provisions (40 CFR part 63)
63.6602 Table 2c	No Requirements	No Requirements	No Requirements	63.6625(e), (f), (h), (i)	No Requirements	63.6605 63.6640	No Requirements	63.6655 (except 63.6655(c))	Footnote 1 of Table 2c	Yes, except per 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

