

# Memorandum

# Florida Department of Environmental Protection

TO: Jeffery F. Koerner, P.E., Program Administrator  
Office of Permitting and Compliance

THROUGH: Syed Arif, P.E. SA 11/8

FROM: Scott M. Sheplak, P.E. JMS

DATE: October 31, 2011

SUBJECT: Hillsborough County  
Hillsborough County Resource Recovery Facility (HCRRF)  
Intent to Issue Package  
Title V Air Operation Permit Revision  
Revised Draft/Proposed Permit No. 0570261-012-AV  
Air Construction Permit Revision  
Revised Draft Permit No. 0570261-013-AC/PSD-FL-369C  
**Permitting Clock:** Not Applicable

Attached for your review are the following documents:

- Cover Letter;
- Written Notice of Intent to Issue Air Permits with Public Notice of Intent to Issue Air Permits;
- P.E. Certification Statement for AC Permit;
- Technical Evaluation and Preliminary Determination;
- Revised Draft Air Construction Permit Revision;
- P.E. Certification Statement for Title V Air Operation Permit;
- Statement of Basis; and,
- Revised Draft/Proposed Title V Air Operation Permit.

This application was received via Electronic Permit Submittal and Processing System (EPSAP). The applicant requested the concurrent processing of an air construction permit revision to change underlying air construction (AC)/PSD permit conditions related to the mercury (Hg) continuous emission monitoring system (CEMS) provisions for Unit 4. The applicant certified compliance in the Title V air operation permit revision application. Review of the Department's Air Compliance and Enforcement Search (ACES) indicates that an inspection performed on October 28, 2011 indicated the facility is in compliance.

The applicant never published the public notice. We received significant comments from CDM (on behalf of the applicant) which resulted in substantial changes to the draft air construction permit revision and as reflected in the draft Title V air operation permit revision issued on August 3, 2011. To my knowledge these revised permits contain appropriate changes to either the applicant's satisfaction or to their understanding. This Title V air operation permit revision application therefore in my opinion is not controversial and is routine. I do not anticipate any more significant comments. Parallel (combined), e.g., draft/proposed, processing is recommended.

Unit 4 at the HCRRF was the first municipal waste combustor (MWC) unit in the U.S. with the requirement to install a Hg CEMS.

I recommend approval of the permits.

Attachments

SA/sms

## P.E. CERTIFICATION STATEMENT

### APPLICANT

Hillsborough County  
Hillsborough County Resource Recovery Facility

Revised Draft Permit No. 0570261-013-AC/PSD-FL-369C

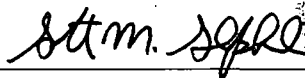
**PROJECT TYPE:** Air Construction Permit Revision (Revises Permit No. 0570261-010-AC/PSD-FL-369B)

### PROJECT DESCRIPTION

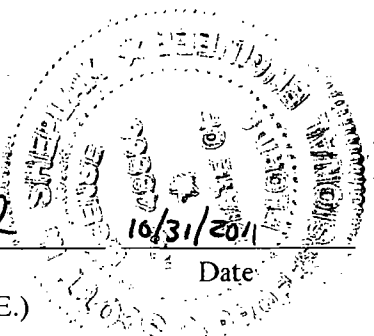
This project is for an air construction (AC)/Prevention of Significant Deterioration (PSD) permit revision.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the PSD of Air Quality. The Department's full review of the project and rationale for issuing the draft air construction permit revision is provided in the Technical Evaluation and Preliminary Determination.

***I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes (F.S.), and F.A.C. Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features). My licensed area of practice as a professional engineer under Chapter 471, F.S. is environmental (air pollution) engineering.*



Scott M. Sheplak  
Professional Engineer (P.E.)  
License Number 48866



10/31/2011

Date

Permitting Authority's Physical Location:

111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Telephone: 850/717-9074 Fax: 850/717-9097

E-mail: [scott.sheplak@dep.state.fl.us](mailto:scott.sheplak@dep.state.fl.us)

SMS/

Permitting Authority's Mailing Address:

Florida Department of Environmental Protection  
Division of Air Resource Management • Office of Permitting and Compliance • Key Industries - Minerals & Metals  
2600 Blair Stone Road, Mail Station #5505 • Tallahassee, Florida 32399-2400

**TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION**

**APPLICANT**

Hillsborough County

350 North Falkenburg Road  
Tampa, Florida

Hillsborough County Resource Recovery Facility  
Facility ID No. 0570261

**PROJECT**

*Revised* Draft Permit No. 0570261-013-AC/PSD-FL-369C  
Application for Minor Source Air Construction Permit  
Revisions to Mercury (Hg) Continuous Emission Monitoring System (CEMS) Provisions for Unit 4

**COUNTY**

Hillsborough County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Office of Permitting and Compliance  
2600 Blair Stone Road, MS#5505  
Tallahassee, Florida 32399-2400



October 31, 2011

## 1. GENERAL PROJECT INFORMATION

### Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### Facility Description and Location

This existing plant is a mass-burn municipal waste combustor (MWC) plant categorized under Standard Industrial Classification No. 4953. This existing plant is located in Hillsborough County at 350 North Falkenburg Road in Tampa, Florida. The UTM Coordinates are: Zone 17, 368.2 km East and 3092.7 km North; Latitude: 27° 57' 14" North and Longitude: 82° 40' 22" West.

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- This facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### Project Description

As part of the project for the Title V air operation permit revision (Project No. 0570261-012-AV), the applicant requested a concurrent air construction permit revision to change several underlying construction permit conditions related to mercury (Hg) continuous emission monitoring system (CEMS) provisions for Unit 4.

### Application Processing Schedule

Application for a Title V Air Operation Permit Revision received via Electronic Permit Submittal and Processing System (EPSAP) on June 9, 2010.

Application for Concurrent Air Construction/PSD Permit Revision from CDM (consultant) dated May 9, 2011 and received on May 11, 2011.

Draft Air Construction Permit Revision clerked (issued) on August 3, 2011.

Comments dated and received from CDM (on behalf of Applicant) on September 20, 2011.

### Relevant Documents

- Permit No. 0570261-007-AC/PSD-FL-369
- Permit No. 0570261-010-AC/PSD-FL-369B

## 2. PSD APPLICABILITY

### General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as PM; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and Hg. In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m<sup>3</sup>, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

### PSD Applicability for Project

The project will revise permit conditions related to Hg CEMS provisions for Unit 4. There will be no emissions increases and the project is not subject to PSD preconstruction review.

### 3. DEPARTMENT REVIEW

#### Background

Municipal waste combustors (MWCs) currently are required to perform stack tests to monitor mercury emissions under the federal regulations, 40 CFR 60, Subparts Cb/Eb. Hg CEMS are currently optional under 40 CFR 60, Subparts Cb/Eb. The Department recognizes that Unit 4 at the HCRRF may be the first MWC unit in the U.S. with the requirement in a permit to install a Hg CEMS. The application of Hg CEMS technology to MWCs is new in the U.S.

The initial PSD permit, Permit No. 0570261-007-AC/PSD-FL-369, had required the installation of a Hg CEMS within two years of Unit 4's commencement of operation. The basis for the two year timeframe after Unit 4's commencement of operation was predicated on Hg CEMS being installed and operated on utilities under the federal Clean Air Mercury Rule (CAMR) regulations (discussed in detail on Page 4 of the Technical Evaluation and Preliminary Determination document for Permit No. 0570261-007-AC/PSD-FL-369). The Department had concluded that 3<sup>rd</sup> generation Hg CEMS would become available and reasonably accurate by the time the HCRRF Unit 4 was to start operation. About 2 ½ years after coal-fired utility boilers were to have installed Hg CEMS, the HCRRF was to install a Hg CEMS. Subsequent to issuance (October 2, 2006) of the initial PSD permit for the HCRRF Unit 4, the federal CAMR regulations were vacated on February 8, 2008. Many of the Hg CEMS purchased by utilities were effectively mothballed.<sup>1</sup> The proposed federal Utility MACT (maximum achievable control technology) also known as the "NESHAP" (National Emissions Standards for Hazardous Air Pollutants) was recently promulgated on March 16, 2011.<sup>2</sup> The proposed Utility MACT contains mercury emission standards and monitoring requirements, e.g., Hg CEMS or Hg sorbent traps. The proposed dates for compliance with the Utility MACT are up to 2014/2015. With the federal regulatory drivers like the Utility MACT, Hg monitoring technology advancements and the market for Hg monitoring technology should increase in the near future.

The original PSD permit required quarterly Hg emission stack testing for the first two years of operation of Unit 4 coupled with the requirement to provide more frequent monitoring by using a Hg CEMS to be installed within the first two years of operation. HCRRF Unit 4 began commercial operation on September 5, 2009. Two years of quarterly Hg emission stack testing have now been completed. Review of the quarterly Hg stack test emission data for this two year period shows that short term concentration based Hg emissions ranged from 1-8 µg/m<sup>3</sup> and that the mass based Hg emissions during this two year period averaged approximately 1/3 of the 0.022 lb/hour limit and were about 64 lbs/year.<sup>3</sup> The 0.022 lb/hour Hg emission limit at 8,760 hours/year is equivalent to 192.72 lbs/year. The PSD Significant Emission Rate (SER) for Hg is 0.1 tons per year (TPY, mass based) or 200 lbs/year.

#### Response to Requested Revisions

As part of the project for the Title V air operation permit revision (Project No. 0570261-012-AV), the applicant requested several changes to Title V air operation permit conditions. Some of these changes required revisions to the underlying construction permit conditions, which are explained below in this Technical Evaluation and Preliminary Determination.

The applicant requested changes to the AC/PSD permit by submitting a permit modification request by letter on May 11, 2011. The "Specific Condition No." cited below refers to the specific condition in Permit No. 0570261-010-AC/PSD-FL-369B. Specific Condition Nos. 3.B.19., 26., 30., 32., 33. and 35., contain Hg CEMS provisions for Unit 4. The applicant requested changes to these provisions.

1. Specific Condition Nos. 3.B.19., 26., 30., 32. and 35., mention the timeframe in which a Hg CEMS is required to be installed or reference the period prior to its installation.

#### Applicant's Requested Changes:

1-year Extension on Installing a Hg CEMS. CDM (consultant) on behalf of Hillsborough County RRF (the applicant) requested an additional year (12 months) to install a Hg CEMS on Unit 4.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### Department's Responses:

An additional 1 year (12 months) extension in which to install a Hg CEMS is reasonable considering the new Hg monitoring technology and learning curve challenges associated with being first in the MWC industry to install a Hg CEMS.

Specific Condition 3.B.35. is where the core requirement to install a Hg CEMS within two years of Unit 4's commencement of operation is located in PSD permit, Permit No. 0570261-010-AC/PSD-FL-369B. Specific Condition Nos. 3.B.19., 26., 30. and 32. in the PSD permit mention or cross reference the two year timeframe in which to install a Hg CEMS. The Department agrees with the requested change, changing these affected specific conditions.

2. Specific Condition 3.B.33.b., contains CEMS data availability requirements.

### Applicant's Requested Changes:

Relief on the % Hg CEMS Data Availability. The applicant requested relief on the percent (%) data availability as it applies to a Hg CEMS. CDM indicated that from their investigations, research and experiences show that Hg CEMS on MWC applications have not achieved 95% monitor availability. Specifically, the applicant requested relief from the 95% monitor availability stated in Specific Condition 3.B.33.b.

### Department's Responses:

The percent (%) data availability requirements in Specific Condition 3.B.33.b. require 95% data availability for each CEMS with an exception to the Hg CEMS. As stated at the end of this specific condition the 95% monitor availability requirement were not to apply during the first two years of operation of the Hg CEMS (mentioned in 40 CFR 60, Subpart Eb for optional Hg CEMS). The limit in the PSD permit, 28 ug/dscm, was established to avoid a BACT determination. The Hg CEMS was required for reasonable assurance purposes not under 40 CFR 60, Subpart Eb. Unless a Hg CEMS is used to demonstrate compliance with the Eb limit (50 ug/dscm), the owner or operator is not required to comply with the Eb requirements like the prescribed % data availability, site-specific plans, etc.

Being that this is the first Hg CEMS being applied to an MWC unit in the U.S., it is recognized that it will be a challenge to work through any issues encountered during the initial installation and operation of the Hg CEMS. Relief on the % data availability may be provided in the form of a step approach as experience is gained by HCRRF. A step approach may be desirable to ultimately achieve a % data availability goal. A two step approach is proposed by the Department; specifically, for the 2<sup>nd</sup> year of operation of the CEMS an 80% data availability annually and for the 3<sup>rd</sup> year of operation of the CEMS a 90% data availability annually with an ultimate goal of achieving 95% data availability annually unless the permittee indicates that the monitor is incapable of achieving these data availability requirements. This step approach is added to the specific condition.

3. Specific Condition 3.B.35. is where the core requirement to install a Hg CEMS within two years of Unit 4's commencement of operation is located in PSD permit, Permit No. 0570261-010-AC/PSD-FL-369B.

### Applicant's Requested Changes:

Hg CEMS Field Test and Success Criteria. CDM, on behalf of the applicant, requested that a Hg CEMS be field tested on Unit 4 and success criteria for the field test to be added to the permit.

CDM in the letter dated May 9, 2011 proposed three specific criteria to judge the success of field testing a Hg CEMS on Unit 4. The three criteria were: 1) Performance Specification 12A (PS-12A), "Specifications and Test Procedures for Total Vapor Phase Mercury Continuous Monitoring Systems in Stationary Sources;" 2) a minimum % data availability; and, 3) a cost comparison between the operation & maintenance (O&M) costs of a Hg CEMS vs. the O&M costs of CEMS currently operational at HCRRF like the SO<sub>2</sub>, NO<sub>x</sub> and CO CEMS.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

### Department's Responses:

In the Fall of 2010, the applicant had reported to the Department problems with a Hg CEMS vendor which had voluntarily been installed on an MWC unit in the U.S.<sup>4</sup> At the April 6, 2011 meeting Department agreed to allow the field testing of a Hg CEMS on Unit 4. CDM followed up with a letter dated May 9, 2011, reaffirming that a new generation Hg CEMS made by Sick-Maihak, Inc. would be field tested on HCRRF Unit 4. Field testing of a Hg CEMS is warranted as this is the first such Hg CEMS application on an MWC unit in the U.S. The Department is allowing the permittee to use any criteria to evaluate the success of the Hg CEMS field test.

It is important to note that an owner/operator of an MWC unit may elect to use a Hg CEMS or a continuous automated sampling system (CASS) under the compliance and performance testing provision of 40 CFR 60.58b(d)(4) in the NSPS 40 CFR 60, Subpart Eb for new MWCs. The Emission Guidelines 40 CFR 60, Subpart Cb for existing MWC units do not require Hg CEMS. As of this date, Hg CEMS are not required under the federal regulations for existing and new MWC units.

This is the first Hg CEMS being applied to an MWC unit in the United States.

As previously mentioned, quarterly Hg emission stack tests during the first two years of operation of HCRRF Unit 4 averaged approximately 1/3 of the 0.022 lb/hour limit at about 64 lbs/year. The PSD SER for Hg is 0.1 tons per year or 200 lbs/year. Actual Hg emissions from HCRRF Unit 4 are confirmed to be less than the PSD SER, still avoiding PSD BACT.

To provide the maximum flexibility to the permittee, under this PSD permit revision the permittee may permanently install and operate the Hg CEMS on HCRRF Unit 4 should they decide to after the 1-year field test. Should the permittee decide not to keep the Hg CEMS on Unit 4 the permittee may replace the Hg CEMS with a Hg CASS by notifying the Department. The notification to the Department to replace the Hg CEMS shall include a justification as to why it is being replaced.

### **Revisions**

The approved revisions are shown in striketrough (for deletions) and double-underlines (for additions) format within the permit revision itself. All changes are emphasized with yellow highlight.

### **4. PRELIMINARY DETERMINATION**

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions.

Mr. Scott M. Sheplak, P.E. was the project engineer responsible for reviewing the application and drafting Permit No. 0570261-007-AC/PSD-FL-369. He is the project engineer responsible for reviewing this application and drafting this permit revision. Additional details of this analysis may be obtained by contacting him by telephone at 850/717-9074 or by e-mail at [scott.sheplak@dep.state.fl.us](mailto:scott.sheplak@dep.state.fl.us) in the Department's Office of Permitting and Compliance at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

### **References**

<sup>1</sup> World wide web site. Mid-Atlantic Regional Air Management Association, Inc. (MARAMA)/Institute of Clean Air Companies (ICAC) Hg CEMS Webinar. Webinar attended on July 26, 2011. Presentations posted on the following world wide web site <http://www.marama.org/mercury-cems-webinar>.

<sup>2</sup> World wide web site. U.S. Environmental Protection Agency (EPA). Utility MACT Information. <http://www.epa.gov/airquality/powerplanttoxics/actions.html>. Accessed on March 16, 2011.

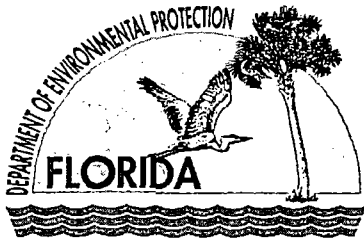


## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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<sup>3</sup> Hillsborough County Resource Recovery Facility, Municipal Waste Combustor Unit 4, Mercury Monitoring Report dated September 29, 2011. Prepared by Scott M. Sheplak, P.E., Office of Permitting and Compliance, Division of Air Resource Management, Florida Department of Environmental Protection.

<sup>4</sup> Reported to the Department on October 22, 2010 at the meeting between HCRRF representatives and the Department.



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

## PERMITTEE

Hillsborough County  
Solid Waste Management Group  
601 E. Kennedy Boulevard  
Tampa, Florida 33602

Draft Permit No. 0570261-013-AC/PSD-FL-369C  
Air Construction Permit Revision -  
Revisions to Mercury (Hg) Continuous Emission  
Monitoring System (CEMS) Provisions for Unit 4

Authorized Representative:  
Ms. Patricia V. Berry, Interim Manager

Hillsborough County Resource Recovery Facility  
Hillsborough County, Florida

## PROJECT

This is the final air construction permit, which revises Permit No. 0570261-010-AC/PSD-FL-369B for Unit 4. The revised permit conditions are related to Hg CEMS provisions. This existing plant is a mass-burn municipal waste combustor (MWC) plant categorized under Standard Industrial Classification No. 4953. This existing plant is located in Hillsborough County at 350 North Falkenburg Road in Tampa, Florida. The UTM Coordinates are: Zone 17, 368.2 km East and 3092.7 km North; Latitude: 27° 57' 14" North and Longitude: 82° 40' 22" West.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). [(if applicable) As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.]

## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida  
For the Division of Air Resource Management

*(Revised Draft)*

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Printed Name of Above Designee)

JFK/sa/sms

**PERMIT REVISION**

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**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on \_\_\_\_\_ (*Revised Draft*) \_\_\_\_\_ to the persons listed below.

- Ms. Patricia V. Berry, Hillsborough County: [berryv@hillsboroughcounty.org](mailto:berryv@hillsboroughcounty.org)
- 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. Paul L. Hauck, P.E., CDM: [hauckpl@cdm.com](mailto:hauckpl@cdm.com)
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- Ms. Heather Ceron, U.S. EPA Region 4: [ceron.heather@epa.gov](mailto:ceron.heather@epa.gov)
- Ms. Katy R. Forney, U.S. EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)
- Ms. Ana Oquendo-Vazquez, U.S. EPA Region 4: [oquendo.ana@epa.gov](mailto:oquendo.ana@epa.gov)
- Ms. Barbara Friday, DEP OPC: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)
- Ms. Lynn Searce, DEP OPC: [lynn.searce@dep.state.fl.us](mailto:lynn.searce@dep.state.fl.us) (for reading file)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

*(Revised Draft)*

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

## SECTION 1. GENERAL INFORMATION

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### **FACILITY DESCRIPTION**

This existing facility consists of: four municipal solid waste combustors (Unit Nos. 1, 2, 3 and 4) with auxiliary burners; lime storage and processing facilities; ash storage and processing facilities; cooling towers; and, ancillary support equipment.

The total capacity of the Hillsborough County Resource Recovery Facility is 1,800 tons/day (TPD) of municipal solid waste fuel. The gross nominal electric generating capacity of the facility is 47 megawatts (MW).

The facility is owned by Hillsborough County and is currently operated by Covanta Hillsborough, Inc. a subsidiary of Covanta Energy Corporation.

### **FACILITY REGULATORY CLASSIFICATION**

- This facility is a major source of hazardous air pollutants (HAP).
- This facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.

### **PROPOSED PROJECT**

As part of the project for the Title V air operation permit revision (Project No. 0570261-012-AV), the applicant requested a concurrent air construction permit revision to change several underlying construction permit conditions related to Hg CEMS provisions for Unit 4.

## SECTION 2. PERMIT REVISIONS

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight in the electronic document.

**Permit Being Modified:** Permit No. 0570261-010-AC/PSD-FL-369B

**Affected Emissions Units:** Municipal Waste Combustor & Auxiliary Burners - Unit 4 (E.U. ID No. 107)

The affected Specific Condition Nos. 3.B.19., 26., 30., 32., 33. and 35. from Permit No. 0570261-010-AC/PSD-FL-369B are hereby changed as follows (the remainder of the permit remains unchanged as a result of this permitting action):

19. Mercury (Hg): Emissions of Hg shall not exceed 28 µg/dscm or an emissions reduction of 85 percent shall be achieved as demonstrated during the required annual stack test. During the first ~~two~~three years of operation, emissions of Hg shall not exceed 0.022 lb/hr as measured during quarterly stack tests to provide reasonable assurance that 12-month emissions are less than the applicable PSD threshold of 200 lb/yr.

After the certification of the Hg-CEMS or the Hg-CASS as described in **Specific Condition 35.**, the owner or operator may demonstrate compliance with all Hg limits in this permit with data collected during an annual stack test or from the Hg-CEMS or the Hg-CASS.

*{Permitting Note: If the Hg-CEMS is certified prior to the end of the first ~~two~~three years of operation, the permittee may use the CEMS in lieu of the remaining quarterly tests.}*

26. Subsequent Compliance Testing: Annual compliance stack tests for NO<sub>x</sub>, CO, SO<sub>2</sub>, HCl, PM/PM<sub>10</sub>, lead, cadmium, dioxins/furans, and ammonia shall be conducted during each federal fiscal year (October 1st to September 30th). Data collected from the reference method during the required RATA tests for CO, NO<sub>x</sub>, and SO<sub>2</sub> may be used to satisfy the annual testing requirement provided the notification requirements and emission testing requirements for performance and compliance tests of this permit are satisfied.

Prior to the certification of the Hg-CEMS or the Hg-CASS as described in **Specific Condition 35.**, performance tests for Hg emissions shall be conducted quarterly during the first ~~two~~three years of operation then on a calendar year basis to demonstrate compliance with the concentration/reduction standards.

After the certification of the Hg-CEMS or the Hg-CASS as described in **Specific Condition 35.**, the owner or operator may demonstrate compliance with all Hg limits in this permit with data collected from the Hg-CEMS or the Hg-CASS.

[Rules 62-297.310(7)(a) and (b), and 62-296.416, F.A.C., and 40 CFR 60.8 and 60.58b]

30. CEM Systems: The permittee shall install, calibrate, maintain, and operate continuous emission monitoring systems (CEMS) to measure and record the emissions of CO, NO<sub>x</sub>, Hg and SO<sub>2</sub> from Unit 4 in a manner sufficient to demonstrate continuous compliance with the CEMS emission standards of this subsection. All continuous monitoring systems other than the Hg CEMS shall be installed and functioning within the required performance specifications by the time of the initial performance tests. The Hg CEMS shall be installed and functioning within the required performance specifications by the end of the ~~second~~third year of operation as specified in **Specific Condition 35**.

- a. *CO Monitor*: The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4 or 4A and shall comply with all requirements of 40 CFR 60.58b. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of Section 7 shall be made each calendar quarter, and reported semiannually to the Compliance Authority. The required RATA tests shall be performed using EPA Method 10 in Appendix A of 40

## SECTION 2. PERMIT REVISIONS

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CFR 60 and shall be based on a continuous sampling train. The CO monitor span values shall be set appropriately, considering the allowable methods of operation and corresponding emission standards.

- b. *NO<sub>x</sub> Monitor:* The NO<sub>x</sub> monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 2 and shall comply with all requirements of 40 CFR 60.58b. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of Section 7 shall be made each calendar quarter, and reported semiannually to the Compliance Authority. The required RATA tests shall be performed using EPA Method 7E in Appendix A of 40 CFR 60. The NO<sub>x</sub> monitor span values shall be set appropriately, considering the allowable methods of operation and corresponding emission standards.
  - c. *SO<sub>2</sub> Monitor:* The SO<sub>2</sub> monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 2 and shall comply with all requirements of 40 CFR 60.58b. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F. The required RATA tests shall be performed using EPA Method 6C in Appendix A of 40 CFR 60. The SO<sub>2</sub> monitor span values shall be set appropriately, considering the expected range of emissions and corresponding emission standards.
  - d. *Diluent Monitor:* A continuous emission monitoring system for measuring the oxygen content of the flue gas at each location where carbon monoxide, sulfur dioxide, nitrogen oxides emissions are monitored shall be installed, calibrated, maintained, and operated in accordance with the requirements of 40 CFR 60.58b.
  - e. *Mercury Monitor:* A mercury monitor (Hg CEMS) shall be installed, certified and operated as described in **Specific Condition 35**, below.
32. **CEMS/COMS Certification and Initial Startup:** Each CEMS/COMS, other than the Hg CEMS, required by this permit shall be installed prior to startup. Within 60 calendar days of achieving the maximum production rate, but no later than 180 calendar days after initial startup, the owner or operator shall certify each CEMS/COMS. Upon certification of each CEMS/COMS, the owner or operator shall demonstrate compliance with all applicable standards as specified in this permit. The Hg CEMS shall be installed and functioning within the required performance specifications within the first ~~two~~three years of operation as specified in **Specific Condition 35**. [Rules 62-4.070(3), 62-210.800, 62-210.200(BACT) and 62-297.520, F.A.C.; 40 CFR 60.7(a), 60.13(b), and 60.58b, and Appendix B]
33. **CEMS Data Requirements:** The CEMS shall express the results in the units of the applicable standard and in accordance with 40 CFR 60 subparts A, and Eb.
- a. *Data Exclusion:* Except for monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, each CEMS shall monitor and record emissions during all operations including episodes of startups, shutdowns, and malfunctions. Limited amounts of CEMS emissions data (other than mercury data) recorded during some of these episodes may be excluded from the corresponding compliance demonstration subject to the provisions of **Specific Conditions 28**, and **29**, in this subsection. The permittee shall minimize the duration of data excluded for such episodes to the extent practicable.
  - b. *Availability:* Monitor availability for each CEMS used to demonstrate compliance shall be 95% or greater in any calendar quarter. Monitor availability shall be reported in the quarterly excess emissions report. In the event 95% availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit, except as otherwise authorized by the Compliance

## SECTION 2. PERMIT REVISIONS

Authority. The monitor availability requirements of this condition do not apply to the Hg CEMS for the first two years of operation of the CEM system. (This is consistent with the Hg CEMS availability requirement of subpart Eb.) For the Hg-CEMS, the monitor availability for the 2<sup>nd</sup> year of operation of the Hg-CEMS shall be 80% annually and for the 3<sup>rd</sup> year of operation of the Hg-CEMS shall be 90% annually, with a goal to achieve 95% annually afterwards unless the permittee indicates that the monitor is incapable of achieving these data availability requirements. If the Hg-CEMS is requested by the permittee to be used for compliance under 40 CFR 60, Subpart Eb then the applicable % monitor availability from 40 CFR 60, Subpart Eb must be met.

35. Mercury Continuous Emissions Monitoring System (Hg-CEMS): Within 2436 months of commencing operation, the owner or operator shall install and certify a mercury CEMS demonstrated to meet the requirements in Performance Specification 12A (PS-12A), "Specifications and Test Procedures for Total Vapor Phase Mercury Continuous Monitoring Systems in Stationary Sources," or that has passed verification tests conducted under the auspices of the U.S. Environmental Protection Agency's (EPA) Environmental Technology Verification (ETV) Program. If the vendor provides to the Department verification of certification difficulties such that the CEMS cannot be certified by the certification deadline, and every reasonable effort has been made to do so, the Department shall grant a reasonable extension of time to certify the CEMS. After certification the owner or operator will begin reporting Hg mass emissions data. The owner or operator shall adhere to the calibration drift and quarterly performance evaluation procedures and ongoing data quality assurance procedures in 40 CFR Part 60, Appendix F or 40 CFR Part 75, Appendix B. The mass emissions shall be estimated based on the actual data collected no later than 10 days following the end of the month. The mercury monitoring data results shall be submitted quarterly. The CEMS shall only be used as the method of compliance if the owner or operator, at a minimum, meets the requirements of 40 CFR 60.58b(n). Prior to use of the Hg-CEMS as the method to demonstrate compliance, the owner or operator shall submit written notice to the Department, and receive approval for missing data substitution and a data calculation approach plans.

Hg-CEMS Field Test. The permittee shall field test the application of a Hg-CEMS on Unit 4 for 1-year (12-months). After the 1-year of field testing of the Hg-CEMS, the permittee may keep or replace the Hg-CEMS with a mercury continuous automated sampling system (Hg-CASS) such as a sorbent trap system. The permittee shall provide the Department with its review and justification if the Hg-CEMS is replaced with a Hg-CASS.

Hg emissions data shall be made available upon request by the Department.

The Compliance Authority shall be copied on all notifications and reports.

[Rules 62-4.070(1) and (3), and ~~62-210.200(BACT)~~62-212.400(12) (Source Obligation, escape PSD), F.A.C., 40 CFR 60.58b, and, Hillsborough County Environmental Protection Commission Local Ordinance 1-3.53.1(f), *Municipal Solid Waste Incinerators* (for Hg monitoring)]

## Friday, Barbara

---

**From:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:12 PM  
**To:** 'berryp@hillsboroughcounty.org'  
**Cc:** 'ghoag@covantaenergy.com'; 'jgorrie@covantaenergy.com'; 'hauckpl@cdm.com'; 'strobridgede@cdm.com'; 'lee@epchc.org'; Zhang-Torres; Mulkey, Cindy; 'ceron.heather@epa.gov'; 'forney.kathleen@epamail.epa.gov'; Searce, Lynn; Sheplak, Scott; Arif, Syed  
**Subject:** HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)  
**Attachments:** 0570261-012-AV&013-ACSignedCoverLetter&WrittenNoticeofIntent.pdf

Tracking:	Recipient	Delivery	Read
	✓ berryp@hillsboroughcounty.org'		
	✓ ghoag@covantaenergy.com'		
	✓ jgorrie@covantaenergy.com'		
	✓ hauckpl@cdm.com'		
	✓ strobridgede@cdm.com'		
	✓ lee@epchc.org'		
	✓ Zhang-Torres	Delivered: 11/15/2011 2:12 PM	
	✓ Mulkey, Cindy	Delivered: 11/15/2011 2:12 PM	Read: 11/15/2011 2:19 PM
	'ceron.heather@epa.gov'		
	'forney.kathleen@epamail.epa.gov'		
	✓ Searce, Lynn	Delivered: 11/15/2011 2:12 PM	
	✓ Sheplak, Scott	Delivered: 11/15/2011 2:12 PM	
	✓ Arif, Syed	Delivered: 11/15/2011 2:12 PM	

Dear Ms. Berry:

Attached is the official **Revised Notice of Draft/Proposed Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

Attention: Scott Sheplak

Owner/Company Name: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY  
Facility Name: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY  
Project Number: 0570261-012-AV/0570261-013-AC(PSD-FL-369C)  
Permit Status: REVISED DRAFT/PROPOSED  
Permit Activity: PERMIT REVISION  
Facility County: HILLSBOROUGH

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0570261.012.AV.R\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0570261.012.AV.R_pdf.zip)



**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** 'berryp@hillsboroughcounty.org'  
**Sent:** Tuesday, November 15, 2011 2:13 PM  
**Subject:** Relayed: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

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

'berryp@hillsboroughcounty.org'

Subject: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

---

Sent by Microsoft Exchange Server 2007

**Friday, Barbara**

---

**From:** Berry, Patricia [BerryP@HillsboroughCounty.ORG]  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:31 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:31:13 PM (GMT-05:00) Eastern Time (US & Canada).

**Friday, Barbara**

---

**From:** Berry, Patricia [BerryP@HillsboroughCounty.ORG]  
**Sent:** Tuesday, November 15, 2011 4:44 PM  
**To:** Friday, Barbara  
**Cc:** Johnson, Nate; Caride, E. JoAnn  
**Subject:** RE: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Please note, I am able to open and view the documents. Thank you.

**Patricia V. Berry**

Solid Waste Management Group Manager  
Public Utilities Department  
Hillsborough County BOCC  
p: 813.272.5977 ext. 43338 | f: 813.272.6224  
c: 813.323.6557  
e: [berryP@hillsboroughcounty.org](mailto:berryP@hillsboroughcounty.org)  
w: <http://www.hillsboroughcounty.org>

Please note: all correspondence to or from this office is subject to Florida's Public Records laws.



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**From:** Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]  
**Sent:** Tuesday, November 15, 2011 2:12 PM  
**To:** Berry, Patricia  
**Cc:** 'ghoag@covantaenergy.com'; 'jgorrie@covantaenergy.com'; 'hauckpl@cdm.com'; 'strobridged@cdm.com'; Lee, Diana; Zhang-Torres; Mulkey, Cindy; 'ceron.heather@epa.gov'; 'forney.kathleen@epamail.epa.gov'; Scearce, Lynn; Sheplak, Scott; Arif, Syed  
**Subject:** HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Dear Ms. Berry:

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*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

Attention: Scott Sheplak

**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** 'ghoag@covantaenergy.com'; 'jgorrie@covantaenergy.com'  
**Sent:** Tuesday, November 15, 2011 2:13 PM  
**Subject:** Relayed: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

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

'ghoag@covantaenergy.com'

'jgorrie@covantaenergy.com'

**Subject:** HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

---

Sent by Microsoft Exchange Server 2007

## Friday, Barbara

---

**From:** Hoag, Glenn [GHoag@CovantaEnergy.com]  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:14 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:14:16 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

---

**From:** Gorrie, Jason [jgorrie@CovantaEnergy.com]  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:50 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:50:29 PM (GMT-05:00) Eastern Time (US & Canada).

**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** 'hauckpl@cdm.com'; 'strobridged@cdm.com'  
**Sent:** Tuesday, November 15, 2011 2:14 PM  
**Subject:** Relayed: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

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

'hauckpl@cdm.com'

'strobridged@cdm.com'

Subject: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

---

Sent by Microsoft Exchange Server 2007

**Friday, Barbara**

---

**From:** Hauck, Paul [HauckPL@cdm.com]  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:23 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:23:18 PM (GMT-05:00) Eastern Time (US & Canada).



## Friday, Barbara

---

**From:** Strobridge, Daniel [StrobridgeDE@CDM.com]  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:45 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:45:15 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

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**From:** Strobridge, Daniel [StrobridgeDE@CDM.com]  
**Sent:** Tuesday, November 15, 2011 2:46 PM  
**To:** Friday, Barbara  
**Subject:** RE: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

I have access to the below referenced documents

**From:** Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]  
**Sent:** Tuesday, November 15, 2011 2:12 PM  
**To:** 'berryp@hillsboroughcounty.org'  
**Cc:** 'ghoag@covantaenergy.com'; 'jgorrie@covantaenergy.com'; Hauck, Paul; Strobridge, Daniel; 'lee@epchc.org'; Zhang-Torres; Mulkey, Cindy; 'ceron.heather@epa.gov'; 'forney.kathleen@epamail.epa.gov'; Searce, Lynn; Sheplak, Scott; Arif, Syed  
**Subject:** HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Dear Ms. Berry:

Attached is the official **Revised Notice of Draft/Proposed Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

Attention: Scott Sheplak

Owner/Company Name: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY  
Facility Name: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY  
Project Number: 0570261-012-AV/0570261-013-AC(PSD-FL-369C)  
Permit Status: REVISED DRAFT/PROPOSED  
Permit Activity: PERMIT REVISION  
Facility County: HILLSBOROUGH

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0570261.012.AV.R\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0570261.012.AV.R_pdf.zip)

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0570261.013.AC.R\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0570261.013.AC.R_pdf.zip)

The Office of Permitting and Compliance 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. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise

**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** 'lee@epchc.org'  
**Sent:** Tuesday, November 15, 2011 2:13 PM  
**Subject:** Relayed: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

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

'lee@epchc.org'

**Subject:** HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

---

Sent by Microsoft Exchange Server 2007

## Friday, Barbara

---

**From:** Lee, Diana [Lee@epchc.org]  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 4:03 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 4:03:00 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

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**From:** Microsoft Exchange  
**To:** Zhang-Torres; Mulkey, Cindy; Searce, Lynn  
**Sent:** Tuesday, November 15, 2011 2:12 PM  
**Subject:** Delivered: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

**Your message has been delivered to the following recipients:**

Zhang-Torres

Mulkey, Cindy

Searce, Lynn

Subject: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

---

Sent by Microsoft Exchange Server 2007

## Friday, Barbara

---

**From:** Zhang-Torres  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:58 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:57:54 PM (GMT-05:00) Eastern Time (US & Canada).

**Friday, Barbara**

---

**From:** Mulkey, Cindy  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:19 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:18:33 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

---

**From:** Searce, Lynn  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 3:28 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 3:27:35 PM (GMT-05:00) Eastern Time (US & Canada).



**Friday, Barbara**

---

**From:** Microsoft Exchange  
**To:** Sheplak, Scott; Arif, Syed  
**Sent:** Tuesday, November 15, 2011 2:12 PM  
**Subject:** Delivered: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

**Your message has been delivered to the following recipients:**

Sheplak, Scott

Arif, Syed

Subject: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

---

*Sent by Microsoft Exchange Server 2007*

## Friday, Barbara

---

**From:** Sheplak, Scott  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 2:27 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 2:27:04 PM (GMT-05:00) Eastern Time (US & Canada).

## Friday, Barbara

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**From:** Arif, Syed  
**To:** Friday, Barbara  
**Sent:** Tuesday, November 15, 2011 3:36 PM  
**Subject:** Read: HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY; 0570261-012-AV/0570261-013-AC(PSD-FL-369C)

Your message was read on Tuesday, November 15, 2011 3:36:10 PM (GMT-05:00) Eastern Time (US & Canada).