

Covanta Energy Corporation
350 North Falkenburg Road
Tampa, FL 33619
Phone: (813) 684-5688

RECEIVED

OCT 20 2011

DIVISION OF AIR
RESOURCE MANAGEMENT



October 19, 2011

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
2200 Blair Stone Road
MS 5505
Tallahassee, FL 32399

SUBJ: Hillsborough County Resource Recovery Facility
Draft Permit No. 0570261-013-AC/PSD-FL-369C

Dear Mr. Sheplak:

On August 3, 2011, the Florida Department of Environmental Protection issued Draft Permit No. 0570261-013-AC/PSD-FL-369C (the "Draft Permit") to Hillsborough County Public Utilities, Solid Waste Management Group, incorporating certain revisions related to the installation and field testing of a continuous mercury monitoring system ("Hg CEMS") to be installed at the Hillsborough County Resource Recovery Facility. On September 20, 2011, CDM, acting on behalf of Hillsborough County, provided several comments for the Department's consideration related to certain conditions contained within the Draft permit (copy attached). Additionally, a follow-up discussion related to the comments in CDM's September 20 letter was held between CDM, the Department, and Covanta Energy (the contract operator of the Hillsborough County Resource Recovery Facility) on September 27th, where it was agreed that Hillsborough County (through its authorized agents) would be given the opportunity to propose specific permit language.

Attached, please find an edited version of the Draft Permit for your consideration. The language that we are requesting changes to is indicated by red single underline for additions and ~~red strikethrough~~ for deletions. We believe that these proposed revisions more accurately capture the requirements and expectations of the field testing concept that we have been discussing with the Department since our meeting with you on April 6 earlier this year.

Mr. Scott Sheplak, P.E.

October 19, 2011

Page 2

On behalf of the entire Hillsborough County team (Hillsborough County Public Utilities, CDM, and Covanta), I would like to express our appreciation to you and others at the FDEP for your assistance in advancing the effort to install the first ever Hg CEMS on a Municipal Waste Combustor in the United States. If you would like to further discuss these proposed revisions, please do not hesitate to contact me at (813) 684-5688, extension 3015.

Sincerely,



Jason M. Gorrie, P.E., BCEE
Regional Environmental Manager
Covanta Energy Corporation

ATTACHMENTS

- September 20, 2011 letter to Scott Sheplak
- suggested edits to PSD-FL-369C

c: Nate Johnson, Hillsborough County
Dan Strobridge, CDM
Glenn Hoag, Covanta Hillsborough
Tyler Huffman, Covanta Hillsborough



1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
tel: +1 813 281-2900
fax: +1 813 288-8787

September 20, 2011

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
Draft Permits Nos. 0570261-013-AC/PSD-FL-369C and 0570261-012-AV

Dear Mr. Sheplak:

Hillsborough County is in receipt of Draft Permit No. 0570261-013-AC/PSD-FL-369C and 0570261-012-AV related to the Hillsborough County Resource Recovery Facility. CDM, on behalf of Hillsborough County, hereby provides the following comments on the Draft Permit for the Department's consideration:

- 1) The Facility Description on page 3 of 7 states an incorrect average heating value of 4,500 Btu/lb of refuse. Units 1, 2, and 3 were designed with an average heating value of 4,500 Btu/lb. Unit 4 was designed with an average heating value of 5,000 Btu/lb. The facility-wide pro-rated average heating value is 4,667 Btu/lb.
- 2) Specific Condition No. 35 has been modified to define "Hg CEMS Field Test and Success Criteria". The first of these criteria states that "the Hg CEMS shall accurately measure the Hg concentrations in the stack emissions". The phrase "accurately measure" is subjective and needs to be modified to provide a substantive quantification. We request that the Department modify this language to specify that the monitor must pass Relative Accuracy criteria defined in Section 3 of Performance Specification 12A entitled "Specifications and Test Procedures for Total Vapor Phase Mercury Continuous Emission Monitoring Systems in Stationary Sources" before declaring the field test successful.
- 3) We note in the associated Technical Evaluation and Preliminary Determination document that the Department "concur[s] with the idea behind a cost criterion" but has chosen not to include cost as a "success criteria" for the field test. Rather, the Department is requiring the compilation, tracking, and monthly reporting of





Scott Sheplak, P.E.
September 20, 2011
Page 2

operations & maintenance (O&M) man-hours dedicated to the Hg CEMS field test. If cost to Hillsborough County (both capital and O&M) is not a success criterion, then what value is there in the preparation and submittal of monthly reports related to cost?

It is important to reiterate that Hillsborough County and their contract operator, Covanta, have worked in good faith toward achieving the worthwhile goal of commissioning the first ever Hg CEMS on a municipal waste combustor in the United States. To that end, Hillsborough County voluntarily accepted a permit requirement to install an Hg CEMS in spite of the absence of any underlying regulatory requirement to do so, and Covanta has incurred significant expense as documented in their January 2011 Report entitled "Continuous Monitoring of Mercury Emissions at a Municipal Waste Combustor." Accordingly, we are dismayed that the Department has chosen to not include cost as a criterion to evaluate the overall success during the 1 year field demonstration as agreed to in principal during our meeting on April 6, 2011, and request that you reconsider the wording of Specific Condition No. 35 to include cost.

- 4) The revised permit continues to be silent with respect to the averaging time to be used on data collected by the Hg CEMS. The original Technical Evaluation and Preliminary Determination document associated with Permit No. PSD-FL-369 states: "To insure that PSD is not triggered, the Department will set an annual emission limit of 190 lb Hg/year to be monitored by use of a mercury CEMS." The same document goes on to state: "The required use of the Hg CEMS for the purpose of demonstrating annual emissions ..." (emphasis ours). Because it is clear that the Department intended for the monitor to be used to demonstrate that PSD significance thresholds (in tons/yr) were not exceeded, we suggest that you modify the second paragraph of Specific Condition No. 19 to state that all valid data collected by the Hg CEMS shall be used to calculate the emission rate in tons/year.
- 5) The Hg monitor availability requirements added to Condition No. 34 appear to be reasonable, but until real life experience is gained during the 1 year field trial, it is impossible to predict how realistic it is to achieve these requirements. Hillsborough County is willing to accept aggressive monitor availability requirements, but questions the wisdom of assigning hard percentages (80% for 3rd year, 90% for 4th year, 95% goal thereafter) before obtaining the operational experience envisioned by the 1 year field test. For instance, a scenario could arise whereby the monitor achieves 75% availability during the 1-year field test (thus passing the success criteria), but is





Scott Sheplak, P.E.
September 20, 2011
Page 3

incapable of achieving any higher availability. Such a scenario would place Hillsborough County in non-compliance with the condition. When one considers that Hillsborough County voluntarily agreed to accept an Hg CEMS when there was no regulatory requirement for them to do so, it seems unreasonable for them to have to accept monitor availability requirements that have not been demonstrated to be achievable in the field.

We look forward to the Department's response.

Sincerely,

A handwritten signature in black ink that reads "Wm. R. Crellin Jr., P.E.".

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)





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

(Draft)

(Signature)

(Date)

(Printed Name of Above Designee)

JFK/jkh/sms

PERMIT REVISION

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 _____ (Draft) _____ to the persons listed below.

- Ms. Patricia V. Berry, Hillsborough County: berryv@hillsboroughcounty.org
- 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. Daniel E. Strobridge, QEP, CDM: strobridgedede@cdm.com
- 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. Cindy Mulkey, DEP Siting Office: cindy.mulkey@dep.state.fl.us
- Ms. Heather Abrams, U.S. EPA Region 4: abrams.heather@epa.gov
- Ms. Katy R. Forney, U.S. EPA Region 4: forney.kathleen@epa.gov
- Ms. Ana Oquendo-Vazquez, U.S. EPA Region 4: oquendo.ana@epa.gov
- Ms. Barbara Friday, DEP OPC: 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 (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.

(Draft)

Clerk

Date

SECTION 1. GENERAL INFORMATION

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 with an average heating value of 4,500 Btu/lb. 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 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.

{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_x, CO, SO₂, HCl, PM/PM₁₀, 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_x, and SO₂ 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 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 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.

[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_x, Hg and SO₂ 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 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.

SECTION 2. PERMIT REVISIONS

- b. *NO_x Monitor*: The NO_x 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_x monitor span values shall be set appropriately, considering the allowable methods of operation and corresponding emission standards.
 - c. *SO₂ Monitor*: The SO₂ 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 SO₂ 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 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 3rd year of operation of the Hg CEMS shall be 80% annually and for the 4th year of operation of the Hg CEMS shall be 90% annually, with a goal to achieve 95% annually afterwards unless the Conclusions and Recommendations

SECTION 2. PERMIT REVISIONS

of the Field Test Report outlined in Specific Condition No. 35 below indicate that the monitor is incapable of achieving these data availability requirements, the Hg CEMS is requested by the permittee to be used for compliance under 40 CFR 60, Subpart Eb. 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, Subparts 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 and Success Criteria. The permittee shall field test the application of a Hg CEMS on Unit 4 for 1-year. The criteria for judging the success of the field test are defined as follows:

1. The Hg CEMS shall accurately measure the Hg concentrations in the stack emissions. The procedures and methods described in Performance Specification 12A in 40 CFR 60, Appendix B shall be used to determine relative accuracy of the instrument. The permittee shall submit a quality assurance/quality control (QA/QC) plan for the Hg CEMS to be field tested to the Office of Permitting & Compliance in Tallahassee for review and approval; and,
2. The data availability over a 12-month period shall be at least 70%. The permittee shall maintain a log of the Hg CEMS downtime along with the reason(s) why and shall make it available upon request by the Department.
3. The total operations and maintenance (O&M) costs incurred by Hillsborough County to achieve the accuracy criteria described in 1) above and the availability criteria described in 2) above shall not exceed the estimate provided by the instrument manufacturer by a factor of 1.2¹. The permittee and Department staff shall jointly review the operations and maintenance costs at the end of the 1-year trial period.

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

The permittee shall track and report on a monthly basis the man-hours for operation & maintenance (O&M) of the Hg CEMS during the field test. The monthly O&M man-hours and replacement parts costs shall be reported to the Office of Permitting & Compliance in Tallahassee within 14 days after the end of each month.

¹ Sick-Maihak has provided a quotation for a MERCEM 300Z that anticipates less than 15 man-hours of maintenance per month.

SECTION 2. PERMIT REVISIONS

AllBoth criteria (1., and 2., and 3.) shall be met in order for the Hg CEMS field test to be considered a success.

Within 60 days of the conclusion of the field test period, the permittee shall submit a Field Test Report for the Hg CEMS which addresses criteria 1., and 2., and 3.

As part of the Field Test Report the permittee shall prepare and submit an updated cost estimation for the commercial application of a Hg CEMS on HCRRF Unit 4. The costing estimate techniques from U.S. EPA (similar to what had been provided in Attachment A) shall be used. The permittee shall include documentation from the vendor to support Hg CEMS purchase prices. Actual O&M costs like Hg CEMS labor tracked during the field testing of the Hg CEMS shall be used in estimating the projected O&M costs for the Hg CEMS.

In the Field Test Report the permittee shall provide its conclusions and recommendations regarding Hg CEMS suitability for commercial application on HCRRF Unit 4. The Field Test Report shall be certified by the responsible official (R.O.) and by a Florida professional engineer (P.E.) using the certification statements from DEP Form No. 62-210.900(1). The completed R.O. and P.E. certification statements shall be included with the Field Test Report. The complete Field Test Report shall be submitted to the Office of Permitting & Compliance in Tallahassee for review and approval.

Should the field test of the Hg CEMS be determined not to be a success, the permittee shall submit an alternative Hg monitoring plan using an Hg continuous sorbent trap monitoring system to the Office of Permitting & Compliance in Tallahassee for review and approval within 120 days of the conclusion of the Hg CEMS field test period.

The Compliance Authority shall be copied on all reports.

[Rules 62-4.070(1) and (3), and 62-210.200(BACT), 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)]