

OGDEN



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Mr. Scott M. Sheplak, P.E. **BUREAU OF AIR REGULATION**
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

VIA FEDERAL EXPRESS

SUBJECT: Hillsborough County Resource Recovery Facility
DRAFT Initial Title V Air Operation Permit No. 0570261-001-AV
Written Comments on Revised DRAFT Permit

Dear Mr. Sheplak:

Ogden Martin Systems of Hillsborough, Inc. is submitting written comments on the Revised DRAFT Initial Title V Air Operation Permit for the Hillsborough County Resource Recovery Facility (Permit No. 0570261-001-AV), which was received, undated, by OMSH on or about July 26, 2000. It is our understanding that a separate comment letter on the draft permit was submitted by CDM on behalf of Hillsborough County. Please understand that the views expressed in this letter are solely those of OMSH, as facility operator.

The Hillsborough County Resource Recovery Facility (HC-RRF) has fully demonstrated compliance with 40 CFR 60, Subpart Cb on all three of its three MWC units. Enclosed with this letter is a copy of the complete test report on the last of the three retrofitted MWC units. This letter therefore documents that the HC-RRF has demonstrated achievement of full compliance with 40 CFR 60, Subpart Cb and is fully subject to PSD-FL-121(C) and PPSC 83-19(B). Thus, OMSH will now begin full reporting required under Subpart Cb.

The language in Subsection A and Subsection B of the proposed Title V permit are intended to primarily summarize and restate permit language contained in PSD-FL-104, PSD-FL-121, PSD-FL-121(A), and PPSC 83-19, and applicable regulations. As detailed below, OMSH remains concerned that certain permit conditions in this draft permit are inconsistent with its reading and understanding of the facility's written permit history. The department's consideration of the changes requested below is appreciated.

It is OMSH's understanding that the first 28 pages of the proposed draft Title V permit (subsections A and B) refer to specific conditions that become null and void upon this final demonstration of compliance with 40 CFR 60, Subpart Cb. Since the HC-RRF has successfully documented full compliance with Subpart Cb and the Florida 111(d) plan



requirements, Ogden respectfully restates its prior request that the Subsection A and Subsection B be deleted from the final Title V operating permit document as obsolete. The deletion of these obsolete sections will streamline this permit for all affected parties.

If the Department is unable to remove those portions of draft Title V permit specifically Subsection A and B, please understand that many of the following comments are being entered into the public record to avoid potential misunderstanding. Since, in Ogden's opinion, these sections could be misread as being retroactively effective back to the originally permitting of the plant.

1. **Page 2, Subsection A -Facility Description:** This permit condition states that " the net steam energy of 1158 Btu/lb shall not be exceeded". This is inconsistent with the recently amended PSD # 121(C) which states (on page 7 of 28) that " the facility has a design net steam energy of 1158 Btu/lb." . It is respectfully requested that this reference be modified for consistency with the amended PSD permit.
2. **Page 7, Specific Condition A.3.0 through A.3.7:** These specific conditions that address segregated waste loads and other fuel definitions were not included in the baseline air/PSD permits for the HC-RRF (i.e., PSD-FL-121, PSD-FL-121(A) and PPSC 83-19). These conditions came into effect only after the HC-RRF had been operating for nearly a decade and were integrated into the permit documents only in the development of the 1998 amendment cited as PSD-FL-121(B). Subsection B, page 7 of 28, of that PSD-FL-121(B) states the specific conditions cited above should apply only after improvements to comply with 40 CFR 60, Subpart Cb have been completed. As noted above, OMSH is concerned that having these conditions remain in Subsection A without a clarifying footnote could lead to a future misunderstanding since these conditions were never applicable to OMSH prior to completion of the retrofit to comply with the Subpart Cb Emissions Guidelines. As before, OMSH's feels it is appropriate to be on record with a statement of concern that - if the FDEP is unable to delete or reword Subsection A to clarify the effective date of conditions - there is potential for misunderstanding as to when these record keeping requirements took effect.
3. **Page 10, Specific Condition A.12:** This condition states that "compliance with the sulfur dioxide limit shall be demonstrated annually. As noted in prior Title V and PSD comment letters, OMSH's review of the permit record indicates that there was no permit requirement to do so in its baseline permits and that this statement is inconsistent with the permit history for this facility. As before, to avoid potential misinterpretation, OMSH respectfully requests - for the record - that this language either be stricken or amended for consistency with the permit history for this facility.
4. **Page 11, Specific Condition A.13:** This condition states that " compliance with the nitrogen oxides limit shall be demonstrated annually. "As noted above and as has been noted in prior comment letters, OMSH's review of the permit record indicates that there was no permit requirement to do so in its baseline permits and that this statement is inconsistent with the permit history for this facility. As before, to avoid potential misinterpretation, OMSH respectfully requests - for the record - that this

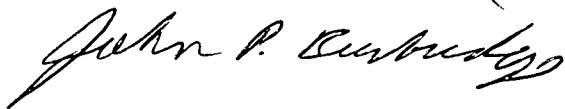
language either be stricken or amended for consistency with the permit history for this facility.

5. **Page 11, Specific Condition A.15:** This condition requires annual testing for carbon monoxide. As noted above and as has been noted in prior comment letters, OMSH's review of the permit record indicates that there was no permit requirement to do so in its baseline permits and that this statement is not consistent with the permit history for this facility. As before, to avoid potential misinterpretation, OMSH respectfully requests - for the record - that this language either be stricken or amended for consistency with the permit history for this facility.
6. **Page 11, Specific Condition A.14 , A.16, and A. 17:** A.14 relates to VOC and states testing was required every 5 years. A.15 relates to mercury and states that annual compliance testing was required. A.17 relates to Beryllium and states that annual testing was required. As noted above and as has been noted in prior comment letters, OMSH's review of the permit record indicates that there was no permit requirement to do so in its baseline permits and that this statement is not consistent with the permit history for this facility. As before, to avoid potential misinterpretation, OMSH respectfully requests - for the record - that this language either be stricken or amended for consistency with the permit history for this facility.
7. **Page 22, Emission Unit Brief Description:** Please exchange the words "completely enclosed" to "completely covered". As noted in prior comment letters on the draft Title V permit, Ogden believes this is a more accurate description of the ash handling operations.

We appreciate your consideration of these comments on the Revised DRAFT Initial Title V Air Operation Permit for the Hillsborough County Solid Waste Energy Recovery Facility.

Please feel free to contact me or Ms. Becky Macionski of my staff if you have any further questions on this matter. We can be reached at (813) 684-5688.

Sincerely,



John Burbridge
Facility Manager

Cc: D. Strobridge, CDM
T. Smith, CDM
B. Macionski, OMSH

8/29/00 cc: Scott Sheplak
Ed Sore