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BUREAU OF AIR REGULATION

August 8, 2000

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

VIA FEDERAL EXPRESS

Subject: Hillsborough County Resource Recovery Facility
Revised DRAFT Permit No. 0570261-001-AV
Written Comments on Revised DRAFT Permit

Dear Mr. Sheplak:

On behalf of Hillsborough County, Camp Dresser & McKee Inc. (CDM) 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), undated, but received in the County Administrator's office July 25, 2000. Thank you for taking the time to discuss our concerns with us on July 31, 2000. Our comments are listed by page number in the DRAFT permit, below:

1. **Page 6, Subsection A:** Specific Condition A.44 specifies that Subsection A will become null and void in its entirety upon demonstration of final compliance. The Facility has recently completed compliance testing for all three retrofitted units. It is anticipated that the results of such testing will fully demonstrate final compliance with 40 CFR 60 Subpart Cb. Accordingly, we have not conducted an in depth review of this section in anticipation that it will become moot within the next 45 days.
2. **Page 30, Specific Condition C.6.1.:** Two new categories have been added to the list of materials that are prohibited. We are concerned that category (j), "untreated biomedical waste", may result in unnecessary confusion when assessing compliance. Rule 62-210.200(45), F.A.C. defines "biomedical waste" as follows:

"Biomedical Waste" - Any solid or liquid waste which may present a threat of infection to humans, including nonliquid tissue, body parts, blood, blood products, and body fluids from humans and other primates; laboratory and veterinary wastes which contain human disease-causing agents; and discarded sharps. The following are also included:

(a) Used absorbent materials saturated with blood, blood products; body fluids, or excretions or secretions contaminated with visible blood; and absorbent materials saturated with blood or blood products that have dried.

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(b) Non-absorbent, disposable devices that have been contaminated with blood, body fluids, or secretions or excretions visibly contaminated with blood, but have not been treated by a method listed in Section 381.0098, F.S., or a method approved pursuant to Rule 64E-16, F.A.C

Hillsborough County has no intention of accepting segregated loads of the materials described above. However, many materials received in the normal municipal solid waste stream could reasonably fall within the above definition, creating a non-compliant situation. As an alternative, we suggest that the condition read as follows:

(j) untreated biomedical waste from "biomedical waste generators" regulated pursuant to Chapter 64E-16 of the Florida Administrative Code.

3. **Page 32, Specific Condition C.6.7:** Hillsborough County's previous request to add the following sentence: "Waste materials specifically authorized above do not require Department approval" was not incorporated. Our concern is that materials described in (a) through (g) could also fall within the category labeled (h), thus creating confusion as to whether or not prior Department approval was required. This request has been incorporated into other WTE Title V permits, as well as PSD-FL-121(C), and we respectfully request that it be included in this Title V permit.
4. **Page 32, Specific Condition C.6.7:** The averaging period for demonstrating compliance with the percentage limitation is inconsistent with PSD-FL-121(C). We request that the rolling 30-day average be changed to a calendar month basis to be consistent with PSD-FL-121(C). See also Specific Condition C.86., a conforming change is requested there.
5. **Page 39, Specific Conditions C.22, C.23, C.24, C.25, C.26, C.27, C.28, C.29, C.30, and C.31:** The inclusion of "equivalent" lb/MMBtu and lb/hr statements remain problematic. We appreciate your comment during our teleconference that Department compliance personnel understand the difference between the actual limitation and the "equivalent" stated parenthetically in the above conditions. However, third parties may not understand that the "equivalents" are not truly limitations, thus creating compliance questions for Hillsborough County. We request that the following permitting note be added to each condition, as was done in PSD-FL-121(C):

Permitting Note: These equivalent emissions (lb/hr and lb/MMBtu) are listed for the purposes of providing information, to indicate the potential to emit (TPY) and are not emission compliance standards.

6. **Page 74, Emission Unit Description:** Hillsborough County's previous request to insert "or covered" after "completely enclosed" was not incorporated. As addressed in a March 23, 2000 amendment to the Title V application, not all areas of the Ash Handling System are "completely enclosed", rather, they are "covered."

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The current language does not correctly describe the existing Facility configuration, and we respectfully request the following change:

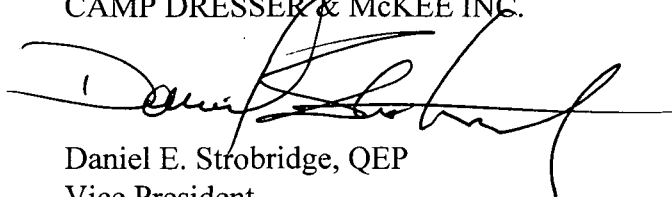
<u>ID No.</u>	<u>Brief Description</u>
-100	Ash Building and Handling System

Flyash and bottom ash is collected and conveyed to the ash handling building. The ash handling system is completely enclosed or covered to decrease the potential for fugitive emissions. The ash is quenched ...

As you indicated in our telephone conversation on July 31, 2000, we can expect your favorable consideration of these comments on the Revised DRAFT Initial Title V Air Operation Permit for the Hillsborough County Solid Waste Energy Recovery Facility. We greatly appreciate your and the Department's cooperation. Please feel free to call me at (813) 281-2900 if you need any clarification, or would like to arrange an additional meeting or teleconference to discuss our comments.

Very truly yours,

CAMP DRESSER & MCKEE INC.



Daniel E. Strobridge, QEP
Vice President

c: T. Smith, Hillsborough County
J. Campbell, Hillsborough County EPC
D. Elias, RTP
C. Hibbard, CDM
J. Burbridge, OMSH
J. Gorrie, CDM

8/9/00 cc: Scott Sheplak
Ed Ives

Florida's DRAFT Permit Electronic Notification Cover Memorandum

TO: Elizabeth Bartlett, U.S. EPA Region 4
CC: Gregg Worley, U.S. EPA Region 4
THRU: Scott Sheplak P.E., Bureau of Air Regulation *sm*
FROM: Edward J. Svec, Permit Engineer *E. Svec*
DATE: 07/24/00
RE: U.S. EPA Region 4 Revised DRAFT Title V Operation Permit Review

The following Revised DRAFT Title V operation permit(s) and associated documents have been posted on the DEP World Wide Web Internet site for your review. The Revised DRAFT permit is for the addition of requirements in the newly issued permit PSD-FL-121(C), at the Hillsborough County Resource Recovery Facility. Please provide any comments via Internet E-mail, to Scott Sheplak, at "Sheplak_S@dep.state.fl.us".

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Hillsborough County Hillsborough County Resource Recovery Facility	Hillsborough	INTERNET	0570261Rd.zip

This zipped file contains the following electronic files:

sob.doc
0570261i.doc
0570261Rd.doc
05702611.xls
05702612.xls
0570261g.doc
0570261u.doc
0570261h.doc