

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 25-May-2000 08:53am

**From:** Scott Sheplak TAL  
SHEPLAK\_S

**Dept:** Air Resources Management

**Tel No:** 850/488-1344

**To:** Larry George TAL 850/921-9555 ( GEORGE\_L@A1 )  
**To:** Patricia Comer TAL ( COMER\_P@A1 )  
**To:** Wendy Alexander ( Wendy.Alexander@dep.state.fl.us )  
**To:** Ed Svec TAL ( SVEC\_E@A1 )

**Subject:** Re: More on Hillsborough RRF issue and Subpart EE issue

Larry,  
Thank you for researching this one. If Ogden Martin calls us we'll inform them.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 24-May-2000 04:13pm

**From:** Larry George TAL 850/921-9555  
GEORGE\_L@A1

**Dept:**

**Tel No:**

**To:** Patricia Comer TAL ( COMER\_P@A1 )  
**To:** Scott Sheplak TAL ( SHEPLAK\_S@A1 )  
**To:** Wendy Alexander ( Wendy.Alexander@dep.state.fl.us )  
**To:** Ed Svec TAL ( SVEC\_E@A1 )

**Subject:** More on Hillsborough RRF issue and Subpart EE issue

To all: In response to a question from the NE District, Pat asked me to look into what we are delegated, and not delegated, with respect to 40 CFR 60, Subpart EE. While researching that, I discovered a FR notice that somehow was missing from our files but is relevant to all NSPS delegations, including the Hillsborough RRF Subpart A issue that we were dealing with last week. In the 9/21/98 FR, EPA delegates NSPS authority to the state for all previously adopted NSPS subparts, and it prospectively delegates future NSPS subparts that we adopt by reference by approving our "mechanism" for adopting those subparts. In this notice, there is a list of all NSPS subparts, including the sections of each that EPA says are NOT delegated to the state. The list includes many undelegated sections which have not been identified as such in 62-204.800. For example, in Subpart A, EPA is now saying that 60.8(b)(1) through (5) are not delegated, not just (2) and (3) as originally stated. This reverses my last memo on the Hillsborough RRF issue--according to this, only EPA can waive a test.

Pat, as to subpart EE, only 60.316(d) is listed as not delegated. The notice does not mention 60.313, which may be an oversight on EPA's part.

Wendy, I'm assuming that the list of undelegated sections in the Federal Register notice came from EPA headquarters. Please check with the region (try Katy Forney, 404-562-9130) as to who we should contact regarding questions about the list. Once we get a name, we can check on Pat's question as to why the case-by-case approval of transfer efficiencies in 60.313 is not retained by the Administrator. I'm also curious as to why EPA "took back" all of 60.8 when, in earlier correspondence, they talked about states being in the best position to make minor decisions under 60.8(1). If this isn't clear, come see me. Thanks - Larry

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 19-May-2000 03:19pm  
**From:** Larry George TAL 850/921-9555  
GEORGE\_L@A1

**Dept:**  
**Tel No:**

**To:** Scott Sheplak TAL 850/488-1344 ( SHEPLAK\_S@A1 )  
**To:** Patricia Comer TAL 850/488-973 ( COMER\_P@A1 )  
**CC:** Wendy Alexander ( Wendy.Alexander@dep.state.fl.us )  
**CC:** Ed Svec TAL ( SVEC\_E@A1 )

**Subject:** Re: Hillsborough RRF question

Scott, Ed: I'm happy to let you guys handle this, whether it be by variance or not at all. Just so you know, in our adoption by reference at 62-204.800 of 40 CFR 60, Subpart A, we exclude 40 CFR 60.8(b)(2)&(3), which have to do with approval of "equivalent" and "alternate" test methods; i.e., we do not have the authority to approve those. This goes back to 1982 when EPA first delegated NSPS authority to us. In their letter of delegation, EPA retained the authority for those two paragraphs. However, we do have authority to implement 40 CFR 60.8(b)(4), which is the provision Ogden-Martin was asking about using. It allows the Administrator (us) to waive test requirements if we are satisfied by other means that compliance is being achieved. Larry

>FYI

>

>Ed Svec and I spoke with Becky Bigari (HCRRF) last week. We mentioned that  
>often the EPA does not delegate certain authorities to states. Often EPA will  
>state so in the 40CFR60 General Provisions and/or the specific federal rule.  
>We recommended that she research this further because we may not even have the  
>authority to act on her request.

>

>The company may not pursue this further; they're trying to save the company  
>some money.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 15-May-2000 09:58am

**From:** Scott Sheplak TAL  
SHEPLAK\_S

**Dept:** Air Resources Management

**Tel No:** 850/488-1344

**To:** Larry George TAL 850/921-9555 ( GEORGE\_L@A1 )  
**To:** Patricia Comer TAL 850/488-973 ( COMER\_P@A1 )  
**CC:** Wendy Alexander ( Wendy.Alexander@dep.state.fl.us )  
**CC:** Ed Svec TAL ( SVEC\_E )

**Subject:** Re: Hillsborough RRF question

FYI

Ed Svec and I spoke with Becky Bigari (HCRRF) last week. We mentioned that often the EPA does not delegate certain authorities to states. Often EPA will state so in the 40CFR60 General Provisions and/or the specific federal rule. We recommended that she research this further because we may not even have the authority to act on her request.

The company may not pursue this further; they're trying to save the company some money.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 12-May-2000 05:14pm

**From:** Larry George TAL 850/921-9555  
GEORGE\_L@A1

**Dept:**

**Tel No:**

**To:** Patricia Comer TAL 850/488-973 ( COMER\_P@A1 )  
**To:** Scott Sheplak TAL ( SHEPLAK\_S@A1 )  
**CC:** Wendy Alexander ( Wendy.Alexander@dep.state.fl.us )

**Subject:** Re: Hillsborough RRF question

Pat,

I was thinking that we could use the permit to render any case-by-case decision which we are authorized by rule to make, which would be an easier process than a separate variance. However, if we need to go the variance route, I will pass that along.

By the way, if you haven't heard, Wendy Alexander is moving from the Title V section into OPAPM to replace Michael, which I'm delighted about. (Sorry Scott, I know you hate to see her go).

Larry

>Why not a variance if we have been delegated the  
>authority to waive the test? The variance/waiver  
>procedure of 120.542 (or 403.201) is the way the  
>legislature told us to do that and we don't have any  
>specific authority under our statutes to do it any  
>other way.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 12-May-2000 08:11am

**From:** Patricia Comer TAL 850/488-973  
COMER\_P@A1

**Dept:**

**Tel No:**

**To:** Larry George TAL 850/921-9555

( GEORGE\_L@A1 )

**To:** Scott Sheplak TAL

( SHEPLAK\_S@A1 )

**Subject:** Re: Hillsborough RRF question

Why not a variance if we have been delegated the authority to waive the test? The variance/waiver procedure of 120.542 (or 403.201) is the way the legislature told us to do that and we don't have any specific authority under our statutes to do it any other way.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 10-May-2000 02:20pm  
**From:** Larry George TAL 850/921-9555  
GEORGE\_L@A1  
**Dept:**  
**Tel No:**

**To:** Scott Sheplak TAL ( SHEPLAK\_S@A1 )  
**To:** Patricia Comer TAL ( COMER\_P@A1 )

**Subject:** Hillsborough RRF question

Pat, Scott: I got a call from Becky Bigari with Ogden Martin in regard to the Hillsborough County RRF. As they complete the retrofits of the units there, they are doing initial compliance tests. They did one in February and will be doing others in July and September/October. Beginning in 2001, they would like to test all the units on the same schedule, say in April or May, to save a little money. That means one of the tests would be more than 12 months old, but the other units would be tested earlier than required. She wondered if they should apply for a variance to move that one test beyond the 12-month interval required by subpart Eb. I told her that I didn't think a variance was appropriate, but maybe something could be built into the Title V permit based on 40 CFR 60.8(h)(4) which allows the Administrator (us, in this case) to waive a test if we are satisfied by other means that the unit is in compliance. In any case, I told her I would run the question by you guys to see what you think. If the permit route is okay, it would probably be best for Scott to call her back at 813-684-5688. Larry

Ed,  
what do you think?  
Scott  
5/11

*Retain title*  
Annual testing within 12-calendar month

Delegated to state?

May send a letter to EPA Region 4.

5/11  
Telecon

March 23, 2000

Mr. Scott M. Sheplak, P.E.  
Administrator, Title V Section  
Department of Environmental Protection  
Twin Towers Office Building  
1600 Blair Stone Road  
Mail Station 5505  
Tallahassee, Florida 32399-2400

Subject: Hillsborough County Resource Recovery Facility Title V Permit  
Application Amendment

Dear Mr. Sheplak:

Hillsborough County wishes to amend its Title V Permit Application to correct descriptive statements relating to the ash handling system and the electric turbine generator capacity.

With respect to the ash handling system, the ash handling building is identified as Emissions Unit #4 in the Title V Permit Application. The Emissions Unit Control Equipment #2 description in III Part 3-2 states that the baghouse is provided for control of fugitive emissions and erroneously states that it keeps the facility under negative pressure. The statement concerning negative pressure should be deleted. Also for this Emissions Unit #4, the Emissions Unit Control Equipment #3 description in III Part 3-3 states that the ash handling system is completely enclosed to decrease potential fugitive emissions. This statement should say that the ash handling system is enclosed *or covered* to decrease potential emissions.

With respect to the turbine generator, it was described as having a rated capacity of 29 megawatts (MW). It has demonstrated the capability to produce 32.5 MW. We wish to describe the turbine generator as having a capacity of 32.5 MW.

All other statements in the Title V application remain unchanged. If you have any questions do not hesitate to contact me.

**RECEIVED**

**MAR 27 2000**

**BUREAU OF AIR REGULATION**



Mr. Scott M. Sheplak, P.E.

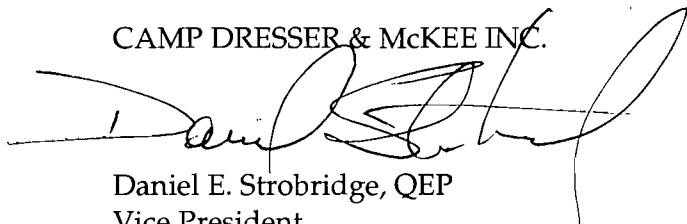
March 23, 2000

Page 2

Attached to this letter are (1) an updated owner/authorized representative or responsible official signature page, (2) an updated professional engineer certification, and (3) an updated compliance certification.

Very truly yours,

CAMP DRESSER & McKEE INC.

A handwritten signature in black ink, appearing to read "Daniel E. Strobridge", written over the company name.

Daniel E. Strobridge, QEP  
Vice President

cc: T. Smith, HCSWMD

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [  ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

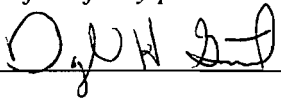
*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [  ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

Signature \_\_\_\_\_

Date 3/22/02

\* Attach any exception to certification statement.

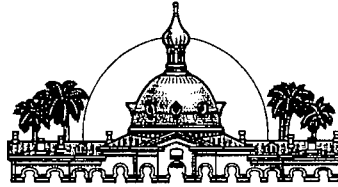
**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official:
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: ( ) - Fax: ( ) -
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature <u></u> Date <u>3/23/00</u>

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: <u>Doug Fredericks</u> Registration Number: <u>44261</u>
2. Professional Engineer Mailing Address: Organization/Firm: <u>CAMP DRESSER + McKEE INC.</u> Street Address: <u>1715 North Westshore Blvd.</u> City: <u>Tampa</u> State: <u>FL</u> Zip Code: <u>33607</u>
3. Professional Engineer Telephone Numbers: Telephone: <u>(813) 281-2900</u> Fax: <u>(813) 288-8787</u>



Hillsborough County  
Florida

Office of the County Administrator  
Daniel A. Kleman

BOARD OF COUNTY COMMISSIONERS

Pat Frank  
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Jim Norman  
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Deputy County Administrator  
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Assistant County Administrators  
Edwin Hunzeker  
Jimmie Keel  
Anthony Shoemaker

March 21, 2000

Mr. Scott M. Sheplak, P.E.  
Administrator, Title V Section  
Department of Environmental Protection  
Twin Towers Office Building  
1600 Blair Stone Road  
Mail Station 5505  
Tallahassee, Florida 32399-2400

Re: Hillsborough County Resource Recovery Facility  
Title V Authorized Representative

Dear Mr. Sheplak:

As the County Administrator for Hillsborough County, Florida, I am the responsible official for the above-referenced Title V source as defined in Rule 62-210.200 F.A.C. I hereby appoint Daryl H. Smith, Director, Hillsborough County Solid Waste Management Department, as the authorized representative for matters and certifications pertaining to the Title V permit for the Hillsborough County Resource Recovery Facility.

If you have any questions concerning this letter of authorization, please contact me at (813) 272-5750.

Sincerely,

Daniel A. Kleman, County Administrator  
Hillsborough County, Florida

COMPLIANCE CERTIFICATION

Compliance statements will be submitted to DEP on an annual basis, or as required throughout the permit term.

*I, the undersigned, am the responsible official as defined in Chapter 62-210. 200 F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.*

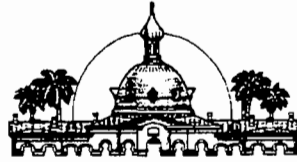
O. W. H. 21  
Responsible Official

3/23/00  
Date

# BOARD OF COUNTY COMMISSIONERS

## Office of the County Attorney

Emeline C. Acton, *County Attorney*  
Ronald G. McCord, *Chief Assistant*  
Donald R. Odom, *Chief Assistant*  
James J. Porter, *Chief Assistant*  
Jennie Granahan Tarr, *Chief Assistant*  
Guilène F. Theodore, *Chief Assistant*  
Beth Novak, *Administrator*



Hillsborough County  
Florida

County Center  
601 E. Kennedy Blvd. -- 27th Floor  
P.O. Box 1110  
Tampa, Florida 33601  
(813) 272-5670  
Fax (813) 272-5231

January 19, 2000

Via Telefax (850) 921-3000

Mr. Doug Beason  
Office of General Counsel  
Department of Environmental Protection  
3900 Commonwealth Blvd.  
Mail Station #35  
Tallahassee, FL 32399-3000

**RECEIVED**

**JAN 24 2000**

**BUREAU OF AIR REGULATION**

Re: Extension of Time to File Comments Regarding Hillsborough County's  
Resource Recovery Facility Permit

Dear Mr. Beason:

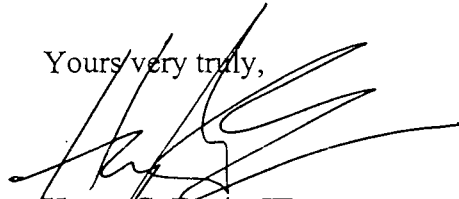
As you are aware, on November 8 Hillsborough County requested additional time to review DEP's proposed permit regarding our Resource Recovery Facility. We faxed a letter directly to you requesting the additional time after I spoke with you personally over the telephone. When we spoke on the telephone, you said that we would receive additional time to file our comments and if necessary file for an administrative hearing and your secretary would be sending us the approved order. Three weeks went by and we did not receive anything from you so we contacted your secretary Ms. Heather Chapman. She told us that she was faxing us a letter giving us 45 days from November 30, 1999 to file comments and if necessary file for an administrative hearing. Yet, we did not receive the order until December 29, 1999 which gave us until January 21<sup>st</sup> to file for an administrative hearing. The order did not reference an extension of time to file our comments and I called you immediately and you stated that this was not a problem. However when we filed our comments on January 14, Mr. Ed Svec of the Bureau of Air Regulation said that the County's comments were untimely since they were filed more than 30 days after publication of notice.

We don't understand this position. Based upon your representations to us, we understood we had until January 31 to file our comments. If our comments are not received and considered we will be forced to seek an administrative hearing on the permit which is something we would rather not have to do.

Mr. Doug Beason  
January 19, 2000  
Page Two

Please clarify this issue with Mr. Svec and me right away since we are now up against a January 31<sup>st</sup> deadline to file for an administrative hearing. Your prompt consideration of this is greatly appreciated.

Yours very truly,



Henry G. Ennis, III  
Senior Assistant County Attorney

/1

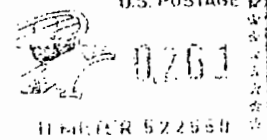
cc: Daryl H. Smith, Director, Solid Waste Management Department  
Marti Chumbler, Esquire, Carlton Fields  
Mr. Ed Svec, Bureau of Air Regulation

1/24/00 cc: Ed Svec  
Scott Sheplak

OFFICE OF THE COUNTY ATTORNEY  
HILLSBOROUGH COUNTY, FLORIDA  
POST OFFICE BOX 1110  
TAMPA, FLORIDA 33601  
1140

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01-20-88 FOR PRESORT BLUE TAMPA FL 33601

Mr. Ed Svec  
Department of Environmental Protection  
Bureau of Air Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

ADM3 32399





**RECEIVED**

**JAN 13 2000**

**BUREAU OF AIR REGULATION**

January 11, 2000

Mr. Scott M. Sheplak, P.E.  
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 DRAFT Permit

Dear Mr. Sheplak:

On behalf of Hillsborough County, Camp Dresser & McKee Inc. (CDM) is submitting written comments on the 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 October 26, 1999. These comments also reflect input from the Facility operator, Ogden Martin Systems of Hillsborough, Inc. Our comments are listed by page number in the DRAFT permit, below:

1. **General:** In the Statement of Basis and in the Permit itself, it is not clear that the facility is presently undergoing significant modifications to meet the requirements of 40 CFR Subpart Cb. This is manifested in portions of the permit and the Statement of Basis where it refers to the existing units. The existing units at the time of the permit application were, in fact, as represented in the application. However, at present, Unit 3 has been fully retrofitted, Unit 2 is in the shake-down and testing process using the new air pollution control train equipment. Unit 1 has yet to be retrofitted. (A revised Statement of Basis is provided in Attachment 1 for your consideration. It incorporates many of the specific and general comments which follow). Compliance dates for various requirements throughout the permit are confusing due to the retrofit construction schedule. Hillsborough County requests that all compliance dates, reporting dates, etc. be conformed to a single date, that begin when the final unit (i.e., Unit 1) is retrofitted or simply December 10, 2000 as is stipulated in the State 111(d) plan. Otherwise, the County may have to track three separate regulatory compliance/reporting schedules which is unnecessarily costly, and may even lead to administrative errors and subject the facility to unintended and unnecessary enforcement.

Mr. Scott M. Sheplak

January 11, 2000

Page 2

Also, please ensure that every permit condition that is "not federally enforceable" is identified as such throughout the document, consistent with USEPA's March 5, 1996 "White Paper #2 for Improved Implementation of the Part 70 Operating Permit Program" and Florida Regulation, F.A.C. 62-213.440. Many of the following comments stem from guidance contained in USEPA's July 10, 1995 guidance "White Paper for Streamlined Development of Title V Permit Applications" which encourages elimination or replacement of potentially obsolete or dated PSD permit/New Source Review (NSR) language. We have attempted to identify a number of these in our comments which follow, but we have not identified all of them.

We request that a brief explanation be included which addresses why Subsection A and Subsection C of Section III treats Units Nos. 1, 2, and 3 as though they are entirely different units which they are not. Only, the emissions controls and monitoring systems are different. The combustors (i.e. grates, fans, air controls, and boilers) are the same equipment.

Further, we are requesting affirmative language be included in Subsections A and B that these subsections are effectively deleted from the permit subsequent to December 10, 2000, the final compliance date for the Hillsborough Facility to meet 40 CFR 60 Subpart Cb requirements and Florida's Section 111(d) Plan.

We also suggest that to simplify the Title V permit, PSD-FL-121(B) dated June 29, 1998 be included by reference in lieu of including portions of that permit in this operating permit. In addition, each section of PSD-FL-121(B) clearly indicates the State and Federal authority underlying each permit condition; this level of documentation in this Title V permit effectively distinguishes State only requirements, provides useful long-term reference points and is consistent with Title V permits elsewhere in the country.

As a final general comment, it is requested that the Department use references to applicable federal test methods or equivalent rather than rewriting this language in the permit. This has a number of very significant advantages. It minimizes the potential for mistakes. It would allow use of test methods recognized to be more accurate without having to modify the Title V permit. It takes advantage of the due process and practical flexibility reflected in the text of the codes of State and Federal regulations and it avoids inconsistency between permit language and the actual test methods and requirements of F.A.C. 62-297. An example of this is that the draft permit states throughout that stack testing facilities must meet an 8 diameter and 2 stack diameter criteria. EPA Method 1 and F.A.C. 62-297 also allow testing with 2 and 0.5 stack diameter criteria. The Facility meets the latter criteria, but does not satisfy the 8 and 2 stack diameter criteria.

Mr. Scott M. Sheplak

January 11, 2000

Page 3

2. **Statement of Basis, first page, second paragraph:** In the fourth line the reference to a flyash handling building should be changed to “an ash handling building and system.” Fly ash and bottom ash are combined upstream in the process. (Note: the Department may wish to use the facility description contained in Attachment 1 as a template for the facility description).

Please modify the last sentence of the second paragraph as follows: “The facility will continue to have an ash building and handling system.” Please add a final sentence as follows: “A new lime storage silo and a new carbon storage silo will be provided.”

To eliminate any long-term confusion over the maximum charging rate, we request that it be stated the same throughout the permit and that it be consistent with the June 15, 1998 Final Order Modifying Conditions of Certification [Operational Requirements, No. 9.b(1)] and June 29, 1998 Air Construction Permit PSD-FL-121(B). Please use the following:

*“The maximum individual throughput shall not exceed 460 tons MSW per day (1380 tons per day entire facility), 172.7 MM Btu per hour and 102,000 pounds steam per hour (on a 4-hour block arithmetic average). The incinerator’s boilers shall not be loaded in excess of their maximum operating capacity, equivalent to 1380 tons MSW per day total, but no more than 1200 tons MSW per day on an annual (52 week) rolling average basis for the entire facility”*

3. **Statement of Basis, first page, third paragraph:** Reference to a 29-megawatt electric generator should be changed to “a 32.5 megawatt turbine-generator at a 0.85 power factor.”
4. **Statement of Basis, second page carryover paragraph:** The reference to NESHAP for beryllium should be deleted. Based on the regulatory language in 40 CFR 61, Subpart C, it is clear that the Beryllium NESHAP is not applicable to the Facility, because the Facility does not accept beryllium-containing waste generated by any of the source categories listed in the rule (extraction plant, ceramic plant, foundries, and propellant plants that process beryllium or beryllium compounds). Although incinerators are listed in the applicability criteria, it is only incinerators that accept beryllium-containing waste generated by the source categories listed above that are affected by the rule.

We request, therefore, that “NESHAP - 40 CFR 61, Subpart C . . . Rule 62-204.800(7), F.A.C.” be deleted from this list. (The Facility-specific beryllium emissions limit from its existing PSD permit would still apply.)

Mr. Scott M. Sheplak  
January 11, 2000  
Page 4

5. **Statement of Basis, second page first full paragraph:** In the fifth line, the sentence that states “The baghouse keeps the building under negative pressure.” should be deleted. The baghouse is not capable of this.
- 6. **Statement of Basis, second page, last paragraph:** We are requesting that the sentence “The net steam energy of 1,158 Btu/lb of steam shall not be exceeded.” be deleted. It is not possible or practical to calculate this value on a continuous or real-time basis. Net steam energy may be estimated, but it is just that, an estimate using historical operating data; it is not used in either Florida or Federal regulations as a practicably enforceable parameter. Further, the value of 1,158 Btu/lb is in conflict with PSD-FL-121(B) which cites the net steam energy as 1,378.86 Btu/lb. Please reconcile. Alternately, a sentence which states that: “The nominal design net steam energy is approximately 1,378.86 BTU/lb steam.” would be acceptable.  
PSD
7. **Statement of Basis, third page, carryover paragraph:** Contains another reference to NESHAP for beryllium which should be deleted (see Comment No.4).
8. **Statement of Basis, third page, first paragraph:** In the fifth line, the sentence which states that “The baghouse keeps the building under negative pressure.” should be deleted. See requested substitute text in Comment #5 above. The baghouse is not capable of this.
9. **Statement of Basis, third page, third and fourth paragraphs:** The lime and carbon silos are exempt emission units under 62-296.700 F.A.C. The lime storage silo and the carbon storage silo will each have a maximum potential emission rate of 0.67 tons per year of particulate matter, based on the specified performance of the baghouse of 0.015 grains per dry standard cubic foot. Since this is less than one ton per year, we request, pursuant to Rule 62-296.700(2)(c), that DEP exempt the lime and carbon storage silos from the PM RACT requirements.
10. **Page 2, first paragraph:** We are requesting that the sentence “The net steam energy of 1,158 Btu/lb of steam shall not be exceeded” be deleted. It is not possible or practical to calculate this value on a continuous or real-time basis. Net stream energy may be estimated, but it is just that, an estimate using historical operating data. The use of net stream energy is not based in either Florida or Federal regulations. Further, the value of 1,158 Btu/lb is in conflict with PS FL 121(B) which cites the net stream energy as 1,378.86 Btu/lb. As noted in Comment #6 above, alternately, a sentence which states that: “The nominal design net steam energy is approximately 1,378.86 BTU/lb steam.” would be acceptable.

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11. **Page 3.:** It may be very helpful to differentiate between emission unit ID Nos. for the retrofitted units versus the non-retrofitted units. This would help clarify when and what emission limitations apply to the respective MWCs. We would suggest descriptions of the retrofitted units be: Unit 1-B, Unit 2-C and Unit 3-D as the letter designations coincide with the APC train locations corresponding to each combustion unit and it is consistent with plant operating personnel nomenclature for the equipment.
12. **Page 4, Paragraph 2:** We believe that the odor standard is not federally enforceable because odor limitations are “unrelated to the purposes of the NSR program” (pursuant to USEPA’s March 5, 1996 “White Paper #2 for Improved Implementation of the Part 70 Operating Permit Program”) Please either delete this condition or add the words “Not federally enforceable” to this condition.
13. **Page 4, Paragraph 4:** The facility does not store any 112(r) materials in regulated quantities. Please delete this permit condition or add a permitting note that indicates this fact.
- 13A. **Page 5, Paragraph 7:** Please add the following permitting note: “The Department has not ordered any control devices or systems under the referenced Florida rule.”
14. **Page 6.:** The statement that each municipal waste incinerator is equipped with an American Air Filter is no longer correct. Units 2 and 3 now are now equipped with an SDA/FF. It may be helpful to add a permitting note here about the transition to the retrofitted APC trains.  
  
Also, the heading “Section III. Emissions Unit(s) and Conditions is repeated at the top of the page. One should be deleted. Also, please add a permitting note that these conditions in Parts A and B are applicable prior to December 10, 2000 only. After this date, Parts A and B are null and void and shall not be repeated in any subsequent revisions of this Title V permit.
15. **Page 6, A.1.:** Please add the following to the end of this condition: “demonstrated on the basis of 440 tons per day or 400 tons per day on a 52 week rolling average.” This language reflects the agreement reached with Hillsborough County EPC and was addressed in the PSD-FL-121(A) permitting action. Please refer to the permit file. It is not possible to demonstrate on a real-time basis, capacity in pounds per hour of refuse charged. The new federal regulations recognize this by identifying steam flow/rate [as a 4-hour block average] as a means of monitoring facility capacity.

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16. **Page 7.:** Conditions A.3.0, A.3.1, A.3.2, A.3.3, A.3.4, A.3.5, A.3.6, A.3.7 should be eliminated because this is not the fuel definition or the record keeping requirements for the non-retrofitted MWCs. The fuel definition for this portion of the permit should reflect that in PSD-FL-121. Such records have not been maintained for the existing units. The reference to Florida Statutes at Section 403.706.5 is a state only enforceable requirement; this should be noted.
17. Reserved
18. **Page 10, A.8.:** The reference to EPA should be changed to FDEP or the Department. Also, we are requesting that “two hours in any 24-hour period” be changed to “three hours per occurrence” for the duration of excess emissions due to equipment malfunction, consistent with the Emissions Guidelines (40 CFR 60.58b(a)(1)). The Department has previously granted three hours for this facility and for the Tampa facility. Also, note that two hours in any 24-hour period malfunction limitation is not a federally enforceable condition.
19. **Page 11, A.11.:** Please delete all of paragraphs (b), (2), and (3) as they are from Subpart E requirements which are not applicable to the existing units. The rule citation also needs to be corrected. Also please add “or equivalent” to each of the test methods listed in conditions A.11 to A.18 (if appropriate, given limited time frame for effectiveness), and to conditions C.37 to C.49 to allow for future test methods to be adopted by agreement between FDEP and the Facility without a potential need to amend the permit to allow for alternate test methods.
20. **Page 11, A.12.:** Please add test Method 6C as an acceptable test method. Also, strike “annually” and insert the words “upon initial operation of the unit” as that was the requirement of PA 83-19 and PSD-FL-108 which was the original PSD permit (dated 7/7/86). It only required annual tests for TSP, not SO<sub>2</sub>. No annual SO<sub>2</sub> test data exist for the facility.
21. **Page 12, A.13.:** Please add test Method 7E as an acceptable test method. Also, strike “annually” and insert the words “upon initial operation of the unit” as that was the requirement of PA 83-19 and PSD-FL-121(A). No annual NO<sub>x</sub> test data exist for the facility.
22. **Page 12, A.14.:** Please add test Methods 18 and 25 as an acceptable test methods. Also, strike “annually” and insert the words “upon initial operation of the unit” as that was the requirement of PA 83-19 and PSD-FL-121(A). No annual VOC test data exist for the facility.

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23. **Page 12, A.15.:** Please strike “annually” and insert the words “upon initial operation of the unit...” as that was the requirement of PA 83-19 and PSD-FL-121(A). No annual CO test data exist for the facility.
24. **Page 12, A.16.:** Please add test Method 29 as an acceptable test method. Also, strike “annually” and insert the words “upon initial operation of the unit” as that was the requirement of PA 83-19 and PSD-FL-121(A). These permits did not require every five-year testing. F.A.C. 62-296.146 stipulates that Method 29 be used for mercury inventory purposes.
25. **Page 12, A.17.:** Please add test Method 29 as an acceptable test method. Also, strike “annually” and insert the words “upon initial operation of the unit” as that was the requirement of PA 83-19 and PSD-FL-121(A). No annual Be test data exist for this facility. No permit required five-year testing for Be.
26. **Page 13, A.20.:** Please revise this condition to read as follows: “Testing of emissions shall be conducted with the emissions unit operation at plus or minus 10 percent of nominal capacity (150 MM Btu per hour).” The language that is presently there reflects the Emission Guideline and NSPS language which is not applicable to the existing units. The revised language reflects the current permit conditions for the existing units.
27. **Page 14, A.24.:** Paragraphs under (a) need to be renumbered (1 is missing as are 6, 7, and 8). We request that paragraph 2 be deleted as it is not applicable to the facility it is applicable only to fossil fuel steam generators.
- 27A. **Page 14, A.26.:** Because the cited rule, 62-297.310, F.A.C. applies to Monitoring of Operations during stack testing, we request that the heading be changed to “Stack Test Process Variables” alternate suggestion for heading is “Monitoring of Operations During Stack Tests” - which is closer to FDEP’s language to avoid any future confusion.
28. **Page 16, A.28.:** We request that the requirement for quarterly tonnage reporting be deleted as it is not a current permit condition, it was deleted in the PSD-FL-121(A) permit action whereby daily refuse charging rates are to be estimated on a 12 month rolling average. Tonnage data are maintained at the facility and are available for Department inspection. Also, please note that 40 CFR 60.53, Subpart E addresses daily charging rate. FAC Rule 22-213.440(1)b2.b addresses record retention requirements and is silent on any reporting requirements.

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29. **Page 20, A.37.:** Please delete this permit condition as it is not applicable to the existing units and is not contained in any of the applicable permits. This condition needs to be removed from Section A of the Title V permit to avoid any confusion as to when these recording keeping requirements become effective (i.e. following the completion of the retrofit). No such records exist for the existing units.
30. **Page 22, A.42.:** This condition refers to acid rain and is not applicable to the Facility. We request that it be removed. We would be required to revise our fuel usage beyond Subpart Db requirements and modify the "acceptable fuels" portions of this Title V permit in order to even achieve the 20% or more fossil fuel consumption.
31. **Page 23 Brief Description:** The description and emissions limitations for the ash conveyor and handling system provided in Subsection B are substantially different from those in the June 26, 1998 Air Construction Permit, PSD-FL-121(B) - Section III.C.1 to C.3) relative to the description of the ash conveyors and handling systems and testing thereof. Please reconcile.

The description given for the ash handling system is not entirely accurate. To make it accurate please make the following editorial changes:

- (1) In the first line, delete the word "flyash" and insert "bottom ash quench tanks and subsequently conveyed to the ash" handling building.
  - (2) In the second line, delete the word "completely" and insert "covered or."
  - (3) Delete the last sentence regarding the building is kept under negative pressure, it is not.
32. **Page 24, B.2.:** Please add the words "or covered" to the end of this condition to clarify that some ash handling facilities are covered but not necessarily fully enclosed.
33. **Pages 24 through 27; B.5, B.6., B.7., B.8., B.9., B.10., B.11., B.12., B.13., and B.15.:** In PSD-FL-121 there are no requirements for annual testing of the ash handling building or systems. Other than for an initial test, the facility has done no testing and has no records of such testing. We are requesting that all of these conditions be deleted from this portion of the permit to avoid confusion over what testing was required when (i.e. before or after the retrofit to comply with 40 CFR Subpart Cb).

The following Comments (Nos. 34, 35, 36, 37) are relevant only if our requests in Comment No. 33 are denied.



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- 33A. **Page 24, B.5.:** As noted in Comment 27, please reword the heading to specify that this permit condition addresses only "Determination of Process Variables During Stack Testing."
34. **Page 24, B.6.:** We are requesting that Particulate Emission from the ash handling system, including the baghouse, be determined using Method 9. The visible emission standard of five percent opacity is specified in B.4, but there is no explicit waiver of Method 5 testing exemption pursuant to FAC 62-297.620(4). We are requesting such a specific authorization here. The initial test was done based upon visual observation Specific Condition #5c(1) of air permit PSD-FL-121 specifically waives "compliance test requirements for the ash handling facility... in accordance with Rule 17-2.700(3)(d), FAC."
35. **Page 24, B.8.:** The waiver of the compliance test needs to be written into the permit as noted in this condition. The visible emission standard of five percent opacity is specified in B.4, but there is no explicit waiver authorized, consistent with PSD-FL-121 as noted above. We are requesting such an authorization. Further, a permitting note is needed to indicate that PSD-FL-121-(A) contains no annual requirement for demonstrating compliance with the limitations contained in B.3 or B. 4.
36. **Page 26, B.13.:** Paragraphs under (a) require renumbering. Also, we request that paragraph (a) 2. be deleted as it is not applicable to the facility or to the ash handling system.
37. **Page 27, B.14.:** We are requesting that the 45 day period for reporting test results be changed to 60 days, consistent with condition A.29.
38. **Page 29, III Subsection C, Brief Description:** We have the following comments:
- (1) It may be helpful to change the E.U. ID Numbers to reflect that these are the retrofitted MWC units. (See Comment No. 11).
  - (2) In the first paragraph the "s" should be removed following 102,000 and placed after the lb in lb/hr.
  - (3) reference to the NESHAP for Be should be deleted per our previous comments. (See Comment No. 4).
  - (4) See Comment Nos. 6 and 10 regarding net steam energy. We are requesting the same at this location.

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(5) The last sentence in the permitting note referencing Subpart Eb may be confusing to some. It is requested that it be deleted or restated that “any Reference to Subpart Eb is applicable only insofar as that regulation is referenced in Subpart Cb.”

39. **Page 30, C.1.:** To be consistent with the concept of “heat input” as verified by steam flow, we are requesting that the words “of 4500 Btu/lb” be inserted in the fifth line following 1200 tons. In the same line we are requesting that 52 week rolling average be changed to 12 month rolling average consistent with Condition C.87. Condition C.87 is word-for-word consistent with Condition B.14 of Air Construction Permit PSD-FL-121(B) and should either be paraphrased in Condition C.1 or cross-referenced.

Also, we are requesting that the combustion efficiency calculation requirement be deleted. It is not required under 40 CFR 60 Subpart Cb and it is not required in other MWC permits issued by the Department. Eliminating it would also be consistent with USEPA’s March 5, 1996 “White Paper #2 for Improved Implementation of the Part 70 Operating Permit Program.” which encourages elimination or replacement of potentially obsolete or dated PSD permit/NSR language. The Title V permit substantially tightens the carbon monoxide (CO) limit. USEPA and other states now use CO monitoring as the preferred measure of good operating practice to achieve good combustion efficiency.

40. **Page 30, C.2.:** We are requesting that all of this language be deleted and replaced with language that stipulates that the Hillsborough County MWC Units 1, 2, and 3 are large units pursuant to 40 CFR 60 Subpart Cb. Paragraph (2) is not applicable to the Hillsborough Facility, it is not a batch feed MWC.

41. **Page 33, (h):** Please add the following sentence to this paragraph. “Waste materials specifically authorized above do not require Department approval.” This will avoid any future confusion over what wastes need Department approval prior to processing.

42. **Page 33, C.6.8.:** Please strike the last sentence in the note, as it is inconsistent with condition B.8 on page 13, PSD-FL-121(B). Auxiliary burner operations occur primarily during start-up and shut-down, consequently an average hourly heat input from these is not appropriate to these facilities.

43. **Page 34/35, C.10.:** In (1) please place a period after “arithmetic average” and delete the remainder of the sentence because it is not applicable. Also, please delete Paragraph (2) as it is not applicable to the Hillsborough Facility.

44. **Pages 37 and 38, C.11., C.12., C.13 and C.14.:** We are requesting that in lieu of the obscure time schedules contained in these conditions, specific dates be identified to

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avoid confusion particularly in light of the retrofit construction schedule which will result in three separate dates when units are started-up. We are suggesting that December 10, 2000 be used for the start-up date for the facility because that is the due date for the retrofit construction in accordance with the state 111(d) plan. Also, when referencing to a time frame following an event (e.g. State Plan approval), please insert the actual date as it is known. This will also eliminate confusion in the future.

45. **Page 39, C.15., C.17., and C.18.:** We are requesting that the limitations expressed as lb/MM Btu be deleted, as they are not required by the Emission Guidelines. Also, the limitations stated in terms of lb/hr and lb/yr are state limitations only and as such should not be federally enforceable. We are requesting that a permit note to this effect be included. We are further requesting that the limitations in terms of lb/hr be deleted as these values are based upon air flow estimates and not actual measured airflow. We are confident that the annual emissions (tons/year) can be successfully demonstrated using lb/hr values multiplied by annual operating hours. We would stipulate to providing the Department with the lb/hr values from annual compliance testing, we do not however, think it should be a limitation.
46. **Page 39, C.19.:** This regulation is no longer applicable to the new MWC units, please delete it from the permit or move it to subsection A.
47. **Page 40, C.20.:** We are requesting that this condition be deleted or moved to subsection A because it is not applicable to the retrofitted Hillsborough Facility. The facility does not employ waste separation for mercury reduction.
48. **Page 40, C.21.:** We are requesting that this condition be deleted as it is not applicable to the retrofitted MWC units at the Hillsborough Facility.
49. **Page 40, C.22.:** We are requesting that the limitation expressed as lb/MM Btu and lb/hr be deleted as it is not required by the Emission Guidelines. (See Comment No. 45).
50. **Page 41, C.23., C.24., C.25., and C.26.:** We are requesting that the limitations expressed as lb/MM Btu and lb/hr be deleted as they are not required by the Emission Guidelines. (See Comment Number 45).
51. **Page 42, C.27., C.28., and C.29.:** We are requesting that the limitations expressed as lb/MM Btu and lb/hr be deleted as they are not required by the Emission Guidelines.(See Comment No. 45).

In **C.28.:** Please specify that the emission limitation is a three-hour average.

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- In **C.29.:** Please specify that the emission limitation is a three-hour average.
52. **Page 42, C.30.:** Please specify that the emission limitation is a three-hour average.
53. **Page 42, C.31.:** Please specify that the emission limitation is a three-hour average.  
Also, in the permitting note, please delete reference to acid rain because those provisions do not apply to the facility.
54. **Page 43, C.34.:** In the second line, we believe the reference to Subpart Eb should be Cb. This Subpart clearly states how malfunctions are limited to three hours per occurrence. We are requesting that “Except as provided by 40 CFR 60.56b” in the first line be deleted because it is applicable to air curtain incinerators. For clarification, we request that “malfunction” be included in the second sentence (i.e., Duration of startup or shutdown or malfunction periods.....).
- 54A. **Page 47, C.40.:** In (5), the reference to Condition C.82 should be C.81.(f).
55. **Page 51, (iii):** 7 nanograms should be **15** nanograms as specified in Subpart Cb. (This appears in four locations in this paragraph).
56. **Page 53, C.45.:** The Hillsborough Facility emits little or no detectable Fluoride and the Department recognizes that MWCs in Florida emit little or no detectable levels of Fluoride. We are requesting that the annual compliance test requirement be changed to a frequency of every five years, consistent with requirements for other MWC facilities.
57. **Page 53, C.46.:** The Hillsborough Facility emits little or no detectable Beryllium and the Department recognizes that MWCs in Florida emit little or no detectable levels of Beryllium. We are requesting that the annual compliance test requirement be changed to a frequency of every five years, consistent with requirements for other MWC facilities.
58. **Page 53, C.48. and C.49.:** Please specify that testing requirements for these pollutants (VOC and H<sub>2</sub>SO<sub>4</sub> mist) are for initial compliance demonstration only, consistent with PSD-FL-121(B). A note should also be added stating that “According to PSD-FL-121, the Facility is not subject to any emission limitations or testing requirements for sulfuric acid mist.
59. **Page 54, C.50.:** Please insert the words “Except as otherwise specified herein,” at the beginning of this condition.

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60. **Page 54, C.51.:** Please insert “(102,000 lb/hr 4-hour average)” at the end of the first sentence. This will avoid any future confusion that the permitted capacity is measured based upon steam flow. Please substitute the term “maximum demonstrated municipal waste combustor unit load” for “maximum operation rate” in the third sentence of this condition. Respectfully, maximum demonstrated MWC unit load is clearly defined in regulations and permits, operation rate is not.
61. **Page 55, C.55.(a):** Paragraphs require renumbering. (Paragraphs 1, 6, 7, and 8 are missing). Also, paragraph (2) should be deleted because it is not applicable to the Hillsborough Facility.
62. **Page 59, C.64.:** Please delete this condition because there are no combined effluents at this facility and it is not applicable. Also, please change the heading of Monitoring of Operations to “Stack Test Process Variables”. (See Comment No. 27).
63. **Page 60, C.66.:** Please make changes requested in Comment #27 to avoid confusion in the future since this this condition could be misread to imply that it applies at times other than during stack testing.
64. **Page 60, C.66.(b):** Because these devices are not applicable to the Hillsborough Facility and to avoid future confusion, please modify the first sentence as follows: “Equipment or instruments used to directly or indirectly determine process variable, including flow meters shall be calibrated... Eliminating the other language will avoid confusion on this issue in the future.
65. **Page 60, C.71.:** Figure 1 is referenced, but is not contained in the draft permit package.
66. **Page 63, C.74.:** Because this condition has already been satisfied, please delete it, or as an alternate, reword it to make it clear that it applies to any future MWC units not covered by this permit.
67. **Page 64/65, C.75.:** Please add a permitting note that states that the Hillsborough Facility will comply with this condition utilizing the gravimetric system or direct weigh system as the primary indicator of the carbon injection rate. Please clarify that the associated averaging period be a daily averaged lb/hr.
68. **Page 65.:** (11) is missing. We do not believe that the CFR language is applicable to the Hillsborough facility as it relates to maintenance of siting records. Simply add “(11) Reserved.”

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69. **Page 65, C.77.:** Please delete the parenthetical at the end of the first paragraph. It is not consistent with the requirements of 40 CFR 60.59b section (h) which provides that semiannual reporting is only necessary where an excess emission, not authorized under the permit, was recorded.
70. **Page 71, C.86.:** We are requesting that the following additional sentence be added: "These records shall be kept commencing December 1, 2000. This will avoid confusion vis-a-vis the retrofit construction schedule and will avoid issues associated with the ability to precisely track waste charging rates to individual MWC units. As a practical matter, the facility accepts few if any segregated loads at this time and has no plans to change operations between now and the completion of the retrofit, undertaken to comply with 40 CFR 60 Subpart Cb. Also, we are requesting that the 30-day rolling average in the last paragraph be changed to a 30-day or monthly average for record keeping purposes. This would more easily be integrated with the current tonnage recording system.
71. **Page 73, C.94.:** The Hillsborough County Facility is not subject to Acid Rain regulations. Please delete this condition.
72. **Page 74, Subsection D. Brief Description:** In the first sentence the reference to a "flyash handling building" should say "ash handling building" as the flyash and bottom ash are combined. In the second sentence, please insert the words "or covered" following the word "enclosed." Please strike the last sentence of the first paragraph because it is not factual. Please refer to earlier comments on the description of the residue handling system.
73. **Page 77, D.13.:** We request that the Department specifically grant the waiver to allow the use of Method 9 visible emissions test for the particulate matter compliance test referenced in this condition pursuant to F.A.C. 62-297.620(4).
74. **Pages 77 through 83, Conditions D.13., D.14., D.15., D.16., D.18., D.20., D.21., D.22., and D.23.:** With the exception of the basic reporting requirement in D.23, we are requesting that these conditions be deleted because they are not applicable to this emissions unit (e.g. the ash management system). Doing so would streamline the permit significantly and would pursue USEPA's policy in this regard. Given our request for use of Method 9 for PM compliance purposes, subsection D.23.(c) could be deleted to streamline the permit.

If our requests in Comment No. 74 are granted, Comment Nos. 75 and 76 may be ignored.

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75. **Page 78, D.16. (a):** We request that this condition, which relates to soot blowing, be deleted because it is not applicable to the ash handling system operation. Also, Paragraphs 1, 5, 6, 7, and 8 are missing. They should be marked "Reserved" if all of Condition D.16. (a) is not deleted.
76. **Page 79, D.16. (c):** We request that the Department specifically grant the waiver to allow the use of Method 9 visible emissions test for the particulate matter compliance test and state this in this condition. (See Comment No. 73).
77. **Page 82, D.23.(b):** We are requesting that the 45 day period be changed to 60 days to coincide with our other test reporting due dates.
78. **Page 85, E.8.:** We request that the Department specifically grant the waiver to allow the use of Method 9 visible emissions test for the particulate matter compliance test and state this in this condition for the lime silo baghouse. (See Comment No. 73).
79. **Page 86, E.10.:** Given the nature of this emission unit (baghouse on a pebble lime silo), this condition could simply specify that the observation period be 30 minutes. Everything else in this condition is not applicable. We request that it be modified in this regard.
80. **Page 86, E.11. (a):** We request that this condition, which relates to soot blowing, be deleted because it is not applicable to the lime silo baghouse operation. Also Paragraphs 1, 5, 6, 7, and 8 are missing. They should be marked "Reserved" if all of Condition E.11. (a) is not deleted.
81. **Page 87, E.11. (c):** We request that the Department specifically grant the waiver to allow the use of Method 9 visible emissions test for the particulate matter compliance test and state this in this condition. (See Comment No. 73).
82. **Page 88, E.12.:** We are requesting that the Department specify process variables for this emission unit or delete this condition because it is not applicable. The unit (e.g., lime silo baghouse) is either on or off (Please see Comment Nos. 63 and 64. They are applicable here also).
83. **Page 87, E.14.:** We are requesting that the 45 day period be changed to 60 days to coincide with our other test reporting due dates. Given our request for use of Method 9 for PM compliance purposes, subsection (c) could be deleted to streamline the permit.

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84. **Page 91, F.8.:** We request that the Department specifically grant the waiver to allow the use of Method 9 visible emissions test for the particulate matter compliance test and state this in this condition for the carbon storage silo baghouse. (See Comment No. 73).
85. **Page 91, F.9.:** This condition is not applicable to the carbon silo baghouse. All of the conditions for this emissions unit should mirror those for the lime silo baghouse.
86. **Page 92, F.10.:** Condition 2.a. is not applicable to this emissions unit. We request that it be deleted to streamline the permit.
87. **Page 92, F.11. (a):** We request that this condition, which relates to soot blowing, be deleted because it is not applicable to the carbon storage silo baghouse operation. Also, paragraphs 1, 5, 6, 7, and 8 are missing. They should be marked "Reserved" if all of Condition F.11. (a) is not deleted.
88. **Page 93, F.11. (c):** We request that the Department specifically grant the waiver to allow the use of Method 9 visible emissions test for the particulate matter compliance test and state this in this condition. (See Comment No. 84.).
89. **Page 94, F.12.:** We are requesting that the Department specify process variables for this emission unit or delete this condition because it is not applicable. The unit (e.g., carbon silo baghouse) is either on or off. (Please see Comment Nos. 63 and 64. They are applicable here also).
90. **Page 94, F.14.:** We are requesting that the 45 day period be changed to 60 days to coincide with our other test reporting due dates. Given our request for use of Method 9 for PM compliance purposes, subsection (c) could be deleted to streamline the permit.
91. **Appendix U-1, List of Unregulated Emissions Units and /or Activities:** Please add NaOH storage tank to this list.
92. **Appendix I-1, List of Insignificant Emissions Units and /or Activities:** Please add Aqueous Ammonia (19%) Storage Tank to this list. Also, the 1100-gallon fuel tank should be relabeled as a 449-gallon fuel tank.
93. **Appendix H-1, Permit History/ID Number Changes:** There are a number of PSD permits listed with expiration dates. PSD permits do not expire per se provided that the construction actually takes place. The construction of the listed facilities has taken place, therefore there should not be any expiration dates noted for the PSD permits.



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93A. **Table 1-1, Page 3 of 6:** The reference to PSD-FL-086 is incorrect. The emission limits identified for SO<sub>2</sub>, NO<sub>x</sub> and CO in this citation come from Subpart Cb. PSD-FL-086 is the City of Tampa's McKay Bay Facility PSD permit, an entirely different facility. Also, there is no "allowable emission limit for sulfuric acid mist." It and the reference to "equivalent emissions" should be eliminated.

94. **Table 2-1:** This table will require revision to conform it to any changes requested above.

95. **Table 2-1, Pages 3 and 4 of 6:** Indicates CMS for VOC and Sulfuric Acid Mist. There are no CMS for these pollutants. Please modify this table.

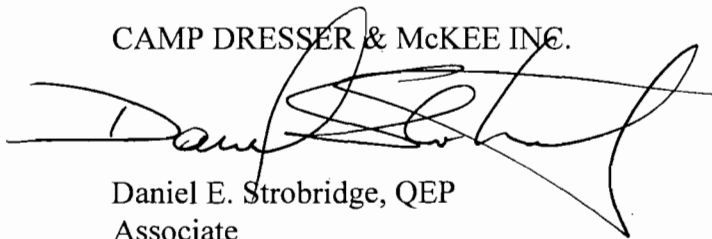
96. The Table indicates that Method 5 will be done upon renewal for the ash handling system, carbon and lime silos. This is inconsistent with PSD-FL-121(B) which only requires annual Method 9 testing. Please make this change to be consistent with PSD-FL-121(B) and our requests above.

We greatly appreciate your favorable consideration of these comments on the DRAFT Initial Title V Air Operation Permit for the Hillsborough County Solid Waste Energy Recovery Facility. We would appreciate the opportunity to meet with you to discuss these at your earliest convenience. In the meantime, please feel free to call me at (813) 281-2900 if you need any clarification, or would like to arrange a meeting to discuss our comments.

We also wish to review the next draft of the permit subsequent to its revision pursuant to our comments.

Very truly yours,

CAMP DRESSER & McKEE INC.



Daniel E. Strobridge, QEP  
Associate

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

Attachment No. 1

STATEMENT OF BASIS

Hillsborough County  
Hillsborough County Resource Recovery Facility  
**Facility ID No.: 0570261**  
Hillsborough County

Initial Title V Air Operation Permit  
**DRAFT Permit No.: 0570261-001-AV**

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Construction of this facility began in 1985 and was completed in 1987. It was originally granted air construction permit PSD-FL-104. The facility's air construction permit was later modified to PSD-FL-121 and later PSD-FL-121 (A). The Final Construction Permit Modification Number PSD-FL-121 (B) was issued on June 29, 1998; this permit updated and clarifies a variety of permitting topics, most specifically, the replacement and improvement of the air pollution control system.

The three incinerator emission units at Hillsborough were each equipped originally with an American Air Filter, three field electrostatic precipitator; details of the retrofit process are detailed herein. The incinerator emission units produce steam which drives a turbine which is connected to an electric generator that can produce 32.5 MW at a Power Factor of 0.85. Units 1, 2 and 3 exhaust through a 220 feet high multi-flue stack with each unit having its own flue.

The promulgation of 40 CFR 60, Subpart Cb, *Emission Guidelines and Compliance Times for Large Municipal Waste Combustors that are constructed on or before September 20, 1994* required the facility to make physical and operational changes to its MWC emission units for the primary purpose of complying with this subpart. Hillsborough County entered into a schedule of enforceable increments of progress as defined in 40 CFR 60, Subpart B - a schedule which is outlined in the State of Florida 111(d) Plan - and is presented in the body of this permit.

The necessary physical and operational changes to each incinerator emission unit needed to satisfy the requirements of 40 CFR 60, Subpart Cb, will either be completed prior to December 10, 2000 or be completed consistent with Hillsborough County's closure agreement. As part of these operational changes each incinerator emission unit (municipal waste combustor) will undergo a retrofit which replaces the original ESP with new air pollution control equipment.

The new air pollution control equipment on the retrofit units will consist of a spray dryer absorber, a fabric filter, and an activated carbon injection system. A selective non-catalytic reduction system (SNCR) will be utilized to control emissions of oxides of nitrogen. The new air

pollution control devices required the facility to install a lime storage silo and an activated carbon storage silo.

During the interim period between the present time (January 2000) and the end of the compliance schedule stipulated in Florida's 111(d) Plan (December 10, 2000 or concurrent with the closure agreement), each of the MWC emission units will be in various phases of the transition from the original ESPs to the installation of the new air pollution control devices. Since this transition is an ongoing process, the different stages of the transition process will not be detailed in this Statement of Basis since much of the information contained herein will become outdated as of December 10, 2000.

These MWC emissions units are regulated under NSPS – 40 CFR 60, Subpart E, Standards of Performance for Incinerators, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; Rule 62-212.400(5), F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT); Rule 62-212.500, F.A.C., Preconstruction Review for Nonattainment Areas; Rule 62-296.401(2), F.A.C., Incinerators; Rule 62-296.416, F.A.C., Waste-to-Energy Facilities; and NESHAP – 40 CFR 61, Subpart C, NESHAP for Beryllium, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C. These emissions units are subject to the requirements of NSPS – 40 CFR 60, Subpart Cb, Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors That Are Constructed on or Before September 20, 1994, adopted and incorporated by reference, subject to provisions, in Rule 62-204.800(8)(b), F.A.C., no later than December 10, 2000, applicable to Units 1, 2 and 3.

Fly ash is collected by screw conveyors along the flue gas path and transported to the proprietary Martin ash discharger where it is combined with the bottom ash. The ash discharger quenches and moistens the combined ash. The combined ash is then conveyed to the residue storage building where it is transferred to a truck for disposal. The ash handling system is completely covered to decrease the potential for fugitive emissions; the moistened ash minimizes potential for fugitive emissions as well. A baghouse is located on the ash handling building as an added precaution for fugitive emissions. The emissions unit on the ash handling building is regulated under Preconstruction Review for Nonattainment Areas; and, Rule 62-296.711, F.A.C., Reasonably Available Control Technology (RACT) – Materials Handling, Sizing, Screening, Crushing and Grinding Operations.

Once the facility becomes compliant with the requirements of 40 CFR 60, Subpart Cb, the facility will consist of the following emissions units:

Each of the three municipal waste combustors (MWCs) shall have a nominal design rated capacity each having a nominal design rate capacity of:

- 400 tons MSW per day
- 150 MMBtu per hour (excluding 9.9 MMBtu/hr from the combustion air preheaters) and 94,270 pounds steam per hour with the MSW having a heating value of 4,500 Btu per pound.

The “operating window” of 115 percent (%) over the nominal design rate of 150 MMBTU heat input corresponds to 172.5 MMBtu/hr heat input and 102,200 lbs steam/hour per each boiler [4 hour block average].

By letter dated March 17, 1998, D.B. Riley, Inc. (boilers' manufacturer) indicated that it performed an evaluation of each boiler's ability to operate at the proposed steam flow of 102,000

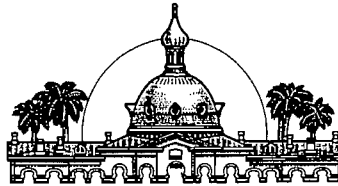
lbs steam/hr and concluded that each boiler can safely operate at an increased continuous steam generation rate of 103,700 lbs steam/hr. Short-term processing capacity is limited by limiting steam production (102,000 lbs/hr - 4 hour block average), which effectively limits heat input.

Lime used in the spray dryer absorbers for each municipal waste combustor is stored in a silo. Emissions from the silo are controlled by a baghouse. Carbon used in the mercury control system is stored in a silo; emissions are controlled by a baghouse. These emissions units are regulated under Rule 62-296.711, F.A.C, Reasonably Available Control Technology (RACT) – Materials Handling, Sizing, Screening, Crushing and Grinding Operations.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 17, 1996, this facility is a major source of hazardous air pollutants (HAPs).

1/14/00 cc: Ed Ivec



Hillsborough County  
Florida

Office of the County Administrator  
Daniel A. Kleman

BOARD OF COUNTY COMMISSIONERS

Pat Frank  
Chris Hart  
Jim Norman  
Jan K. Platt  
Thomas Scott  
Ronda Storms  
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Deputy County Administrator  
Patricia Bean

Assistant County Administrators  
Edwin Hunzeker  
Jimmie Keel  
Anthony Shoemaker

November 17, 1999

**RECEIVED**

**NOV 19 1999**

Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Mail Station # 5505  
Tallahassee, Florida 32329-2400

**BUREAU OF AIR REGULATION**

RE: Title V Draft Permit No. 0570261-001-AV

To Whom It May Concern:

Please find enclosed proof of publication for the above-referenced Title V draft permit. Please advise should you have any questions concerning this submittal. You may reach me at (813) 276-2909.

Sincerely,

Thomas G. Smith, Section Manager  
Management & Environmental Services  
Solid Waste Management Department

*12/8/99 cc: Ed Suer*

**THE TAMPA TRIBUNE**  
**Published Daily**  
**Tampa, Hillsborough County, Florida**



State of Florida }  
 County of Hillsborough } ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of \_\_\_\_\_

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of \_\_\_\_\_  
 NOVEMBER 7, 1999

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

*J Rosenthal*

Sworn to and subscribed before me, this \_\_\_\_\_ 8 \_\_\_\_\_ day  
 of \_\_\_\_\_ NOVEMBER \_\_\_\_\_ 99, A.D. 19 \_\_\_\_\_

Personally Known \_\_\_\_\_ or Product Identification \_\_\_\_\_  
 Type of Identification Produced \_\_\_\_\_

(SEAL)

*Susie Lee Slaton*

OFFICIAL NOTARY SEAL  
 SUSIE LEE SLATON  
 COMMISSION NUMBER  
 CC639424  
 MY COMMISSION EXP.  
 APRIL 16, 2001

PUBLIC NOTICE OF INTENT  
 TO ISSUE TITLE V AIR  
 OPERATION PERMIT  
 STATE OF FLORIDA  
 DEPARTMENT OF  
 ENVIRONMENTAL  
 PROTECTION

Title V DRAFT Permit No.:  
 0570261.001.AV  
 Hillsborough County Resource  
 Recovery Facility

Hillsborough County  
 The Department of Environ-  
 mental Protection (permitting  
 authority) gives notice of its  
 intent to issue a Title V air  
 operation permit to Hillsbor-  
 ough County for the Hillsbor-  
 ough County Resource Recov-  
 ery Facility located at 350 Fal-  
 kenburg Road, Tampa, Hills-  
 borough County. The appli-  
 cant's name and address are:  
 Hillsborough County, 601 East  
 Kennedy Boulevard, Tampa,  
 Florida 33602.

The permitting authority will  
 issue the Title V PROPOSED  
 Permit, and subsequent Title  
 V FINAL Permit, in accor-  
 dance with the conditions of  
 the Title V DRAFT Permit un-  
 less the following in-  
 formation is received in ac-  
 cordance with the following  
 procedures results in a differ-  
 ent decision or significant  
 change of terms or conditions.  
 The permitting authority will  
 accept written comments  
 concerning the proposed Title  
 V DRAFT Permit issuance ac-  
 tion for a period of 30 (thirty)  
 days from the date of publica-  
 tion of this Notice. Written  
 comments should be provided to  
 the Department's Bureau of  
 Air Regulation, 2600 Blair  
 Stone Road, Mail Station  
 #5505, Tallahassee, Florida  
 32399-2400. Any written com-  
 ments filed shall be made  
 available for public inspection.  
 If written comments received  
 result in a significant change  
 in this DRAFT Permit, the  
 permitting authority shall is-  
 sue a Revised DRAFT Permit  
 and require, if applicable, an-  
 other Public Notice.

A person whose substantial  
 interests are affected by the  
 proposed permitting decision  
 may petition for an adminis-  
 trative hearing in accordance  
 with Sections 120.569 and  
 120.57 of the Florida Statutes  
 (F.S.). The petition must con-  
 tain the information set forth  
 below and must be filed (re-  
 ceived) in the Office of Gen-  
 eral Counsel of the Department  
 of Environmental Protection,  
 3900 Commonwealth Boul-  
 evard, Mail Station #35, Talla-  
 hassee, Florida 32399-3000  
 (Telephone: 850/488-9730;  
 Fax: 850/487-4938). Petitions  
 filed by any persons other  
 than those entitled to written  
 notice under Section 120.60(3),  
 F.S., must be filed within four-  
 teen days of publication of the  
 public notice or within four-  
 teen days of receipt of the  
 notice of intent, whichever oc-  
 curs first. Under Section  
 120.60(3), F.S., however, any  
 person who asked the permit-  
 ting authority for notice of  
 agency action may file a peti-  
 tion within fourteen days of  
 receipt of that notice, regard-  
 less of the date of publication.  
 A petitioner shall mail a copy  
 of the petition to the applicant  
 at the address indicated  
 above, at the time of filing.  
 The failure of any person to  
 file a petition within the appli-  
 cable time period shall consti-  
 tute a waiver of that person's  
 right to request an adminis-  
 trative determination (hear-  
 ing) under Sections 120.569  
 and 120.57, F.S., or to inter-  
 vene in this proceeding and  
 participate as a party to it.  
 Any subsequent intervention  
 will be only at the approval of  
 the presiding officer upon the  
 filing of a motion in compli-  
 ance with Rule 28-106.205 of  
 the Florida Administrative  
 Code (F.A.C.).  
 A petition that disputes the  
 material facts on which the  
 permitting authority's action  
 is based must contain the fol-  
 lowing information:  
 (a) The name and address of  
 each agency affected and  
 each agency's file or identifi-  
 cation number, if known;

(b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination.

(c) A statement of how and when the petitioner received notice of the agency action or proposed action.

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state.

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief.

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive,  
Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979

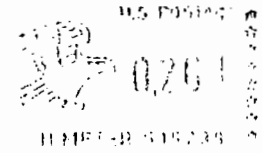
Affected District:  
Department of Environmental Protection  
Southwest District Office  
4807 Laurel Fair Circle  
Tampa, Florida 33619  
Telephone: 813/744-6100  
Fax: 813/744-6084

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplek, P.E., at the above address, or call 850/921-9532, for additional information.

**HILLSBOROUGH COUNTY  
SOLID WASTE MANAGEMENT DEPARTMENT**

COUNTY CENTER  
P.O. BOX 1110  
TAMPA, FLORIDA 33601-1110  
467301

U.S. POSTAGE  
METRO  
NOV 17 1999  
TAMPA FL 33601



00 11-17-99 FCM PRESORT BLUE TAMPA FL 33601

Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, FLORIDA 32329-2400

A

MU10 2232399





file original

copy to Ed Svec

COMMISSION

PAT FRANK  
CHRIS HART  
JIM NORMAN  
JAN PLATT  
THOMAS SCOTT  
RONDA STORMS  
BEN WACKSMAN



ADMINISTRATIVE OFFICES, LEGAL &  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960  
FAX (813) 272-5157

AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

EXECUTIVE DIRECTOR

ROGER P. STEWART

MEMORANDUM

DATE: December 1, 1999  
TO: Scott Sheplak, P.E.  
FROM: Steven S. Pak, P.E. *SP* THRU: Richard C. Kirby, IV, P.E. *RR*  
SUBJECT: Comments on Draft Title V Permit for Hillsborough County RRF

The Environmental Protection Commission of Hillsborough County (EPC) has reviewed the draft Title V Air Operation Permit for the Hillsborough County Resource Recovery Facility (0570261-001-AV) and has the following comments.

Facility-wide Conditions

- 1. The reasonable precautions to prevent unconfined emissions of particulate matter that are included in the initial Title V application but are not included in facility-wide condition 8 should be added.

Subsection A

- 2. Specific condition A.5 contains a nitrogen oxides limit of 6.4 pound per ton which is consistent with the limit in PSD-FL-121, but is less stringent than the 3 pound per ton limit in PA 83-19. The more stringent limit along with the corresponding concentration limit should be included in the permit.
- 3. Specific condition A.5 does not contain the beryllium limit of 10 grams per 24-hour period from 40 CFR 61, Subpart C.
- 4. Specific condition A.16 requires that the existing MWC units demonstrate compliance with the mercury emissions limit using EPA Method 101A prior to permit renewal and every five years thereafter. Method 101A is for sewage sludge incinerators and does not seem appropriate for a facility that is prohibited from burning sewage sludge. Instead, compliance should be demonstrated with EPA Method 29 which is the method required by Rule 62-296.416, F.A.C., and 40 CFR 60, Subpart Cb. In addition, mercury testing is required annually by Rule 62-296.416, F.A.C.

5. PSD-FL-121 requires that the compliance test for visible emissions be conducted simultaneously with the compliance test for particulate matter. This requirement does not appear to be included in the draft permit and should be added to specific condition A.18.
6. An Operation and Maintenance (O&M) plan, as required by Rule 62-296.700(6), F.A.C., needs to be included. At a minimum, the O&M plan should contain the same parameters and requirements as the O&M plan for the City of Tampa, McKay Bay Refuse to Energy Facility (0570127-001-AV).

#### Subsection B

7. Reference to Rule 62-296.711, F.A.C., should be added to the five percent opacity standard found at specific condition B.4.
8. An Operation and Maintenance (O&M) plan, as required by Rule 62-296.700(6), F.A.C., needs to be included.
9. The EPC believes that additional periodic monitoring must be added to satisfy the requirements of Rule 62-213.440(1)(b)1.b., F.A.C. For this emissions unit, we recommend that requirements be added to 1) check and record the pressure drop on the baghouse on a daily basis, 2) perform and record the results of an instantaneous visual emissions determination on the baghouse on a daily basis, and 3) take immediate corrective action and submit a deviation report if visual emissions are observed or the baghouse is found to be operating outside of the pressure range specified in the O&M plan. For an example of how the EPC has incorporated such requirements into an O&M plan, see the draft Title V permit for Lafarge Florida, Inc. (0570018-002-AV).

#### Subsection C

10. Our most significant comment is the manner in which the draft permit handles the upgrades to the facility to comply with 40 CFR 60, Subpart Cb, as authorized by PSD-FL-121(B). The draft Title V permit includes Subsection A which applies to the three existing municipal waste combustor (MWC) units and Subsection C which would apply to the same units after construction is completed and compliance is demonstrated. While we agree with the need for the Subpart Cb compliance schedule in the draft permit, we feel that the actual Subpart Cb requirements should not be incorporated into the permit until after construction is completed, compliance is demonstrated, and an application to revise the Title V permit is submitted. This would be consistent with Rule 62-210.300(2), F.A.C., and the manner in which we process non-Title V operating permits. In addition, waiting to incorporate the Subpart Cb requirements into the Title V permit would allow us to include only the compliance requirements that apply to the facility rather than all the requirements that may apply in the future.

#### Subsections D, E, and F

11. The draft permit includes Subsection D for ash handling and storage, Subsection E for one lime storage silo, and Subsection F for an activated carbon storage silo. All of these emissions

units are a part of the facility upgrades to come into compliance with CFR 60, Subpart Cb. We believe that these unconstructed emissions units should not be included in the Title V permit at this time for the same reasons presented in comment 10 above.

While we have done a detailed review of Subsection C, D, E, and F, we are not providing any specific comments on these subsections because of our position that they should not be included in the permit at this time. If you would like to have our detailed comments on these subsections, or if I can be of any other assistance, please contact me.

12/7/99 cc: Ed SEC