


Memorandum

Florida Department of Environmental Protection

TO: Trina L. Vielhauer
FROM: A.A. Linero 
DATE: August 2, 2007
SUBJECT: Hillsborough County RRF Unit 4
DEP File No. 0570261-009-AC (PSD-FL-369A)
Modification of Permit No. 0570261-007-AC (PSD-FL-369)

Attached is the draft permit modification package for Hillsborough County Resource Recovery Facility Unit 4. The project is to modify the planned nitrogen oxides (NO_x) control equipment for the previously approved Unit nominal 600 TPD mass-burn municipal waste combustor (MWC). The site is located southeast of Tampa near Brandon.

Unit 4 is a nominal 600 tons per day MWC and is presently under construction. The Department previously determined that best available control technology (BACT) for NO_x is 110 parts per million by volume, dry corrected to 7 percent oxygen (ppmvd @7% O₂) of NO_x on a 24-hour average and 90 ppmvd @7% O₂ on a 12-month average, rolled monthly. The previously approved controls to achieve these values included a flue gas recirculation (FGR) system and a urea-based selective non catalytic reduction (SNCR) system.

The operator, Covanta, supplies much of the equipment used at the facility. Covanta now proposes to meet the approved BACT limits for NO_x by installing its recently developed Low NO_x (LN) combustion system in lieu of the FGR system. They propose to install an ammonia-based SNCR system instead of one based on urea. One benefit is that Covanta will guarantee the performance of the system to meet the long-term permitted NO_x limit. They were previously unwilling to provide such a guarantee and claimed that Fueltech would not provide a guarantee for the urea-based SNCR system.

For reference, the overall pollution control equipment will now consist of: a spray dryer (SD) with lime injection to absorb MWC acid gases; an activated carbon injection (ACI) system to adsorb MWC organics and mercury (Hg); a fabric filter (FF) baghouse to remove particulate matter, including absorption/adsorption reagent; an LN system to limit NO_x formation; and an ammonia based SNCR system to destroy NO_x. Continuous emissions monitoring systems (CEMS) are required for CO, NO_x, SO₂ and Hg are required as well as a continuous opacity monitoring system (COMS).

The County also requests a modification of the maximum steam production limit from 190,000 to 200,000 pounds per hour. Covanta provided a reasonable explanation (incorporated into the write-up) for their ability to increase steam production without increasing heat input or emissions. There are no changes proposed in the approved emission limitations. No additional ambient air quality analysis is required.

AAL/th

Attachments

DRAFT

August XX, 2007

Electronically Sent – Received Receipt requested

boldissarb@hillsboroughcounty.org

Mr. Barry M. Boldissar, Director

Hillsborough County Department of Solid Waste Management

601 East Kennedy Boulevard

Tampa, Florida 33602

Re: Hillsborough County Resource Recovery Facility

DEP File No. 0570261-009-AC (PSD-FL-369A)

Installation of the Covanta Low NO_x Process in Unit No. 4

Dear Mr. Boldissar:

The Department is in receipt of your modification request submitted by Covanta Inc to modify the Air Construction (PSD) Permit to allow installation of the Covanta Low NO_x Process. The request is acceptable to the Department and the permit is hereby modified. The changes are shown ~~striketrough~~ and double-underlined as follows:

PROJECT

The permittee, Hillsborough County, proposes to construct a new 600 ton per day (TPD) Municipal Waste Combustor referred to as Unit 4 at the existing facility. The nominal design rate capacity is 600 tons MSW per day, with a nominal heat input of 288 MMBtu per hour and nominal steam production of ~~163,780~~ 170,790 pounds per hour (maximum ~~190,000~~ 200,000 lb/hr). The new unit will be equipped with two natural gas-fired auxiliary burners, each with a nominal heat input of 50 MMBtu per hour. The new unit will be installed at the existing site. The flue for the new boiler is already encased in the existing stack. With the addition of the fourth unit, the existing 220 feet tall stack will contain four active flue streams. With the addition of this unit, the site capacity will increase from approximately 1,200 TPD to 1,800 TPD. The site's steam electric generating capacity will be increased from 39 MW to 47 MW (nominal).

The existing ash building and handling system will be expanded. Two new lime storage silos and a new activated carbon storage silo will be constructed for Unit 4.

Unit 4 will be a mass burn unit incorporating much of the same technology as the existing units including: combustion on a reverse-reciprocating grate system; ash discharge system; energy recovery through the furnace waterwall, superheater and economizers; electrical power production; and a pollution control system consisting of a spray dryer, fabric filter, activated carbon injection system and a selective non-catalytic reduction (SNCR). In addition, the new

unit will incorporate combustion controls or (Covanta LN™ system) flue gas recirculation for energy efficiency and pollution reduction.

SECTION III. EMISSION UNIT SPECIFIC CONDITIONS
B. Municipal Waste Combustor & Auxiliary Burners - Unit 4

Emissions Unit 107

Description: Emissions unit 107 consists of a nominal 600 TPD mass-burn municipal waste combustor (MWC) with two nominal 50 mmBtu/hr natural gas-fired auxiliary burners. The project will also include: a new nominal 17 megawatt (MW) steam turbine-electrical generator; expansion of the ash handling and refuse building; a new transformer yard; a new lime silo; an ammonia or urea reagent storage tank; and a new settling basin. Exhaust from the new unit will be directed to a separate flue already constructed within the existing 220 foot stack.

Steam Capacity: The nominal steam production rate is 163,780 pounds of steam per hour. The maximum steam production limit is ~~190,000~~ 200,000 lb steam/hr (4-hour block average). The nominal heat input is approximately 288 mmBtu/hour.

Controls: Controls consist of: efficient combustion on the grate and furnace; strategic management of combustion air (Covanta LN™ system) or flue gas recirculation (FGR); a spray dryer/absorber in conjunction with a fabric filter (SD/FF) for control of acid gases, particulate matter, and most metals; activated carbon injection (ACI) to enhance mercury (Hg) removal; selective non-catalytic reduction (SNCR) by ammonia or urea injection for NO_x control.

Stack Parameters: The Department may require the permittee to perform additional air dispersion modeling should the actual specified stack dimensions change. The following summarizes the exhaust characteristics:

<u>Fuel</u>	<u>Heat Input Rate</u>	<u>Exhaust Temp., °F</u>	<u>Flow Rate ACFM</u>
MSW	~288 mmBtu/hour	270° F	~125,000

Continuous Monitors: The unit is equipped with continuous emissions monitoring systems (CEMS) to measure and record NO_x, CO, SO₂, and Hg as well as instrumentation to monitor steam flow, flue gas flow rate, oxygen, temperature, and opacity.

Specific Condition No. 4

Control Equipment: The owner or operator shall install, operate and maintain the following air pollution control equipment consistent with the manufacturers' specifications.

NO_x Controls: Combustion air management system (Covanta LN™ system) or a flue gas recirculation system (FGR) will be used to limit NO_x formation. An ammonia or urea-based selective non-catalytic reduction (SNCR) system will be employed for the destruction of NO_x.

MWC Acid Gas Control: A spray dryer (SD) with lime injection will be installed to absorb MWC acid gases.

MWC Organics and Mercury (Hg): An activated carbon injection (ACI) system will be installed to adsorb MWC organics and mercury (Hg).

Particulate Matter (PM/PM₁₀): A fabric filter (FF) baghouse, including absorption/adsorption reagent, will be installed to remove particulate matter.

[BACT Determination, and Rules 62-4.070(1), and (3), F.A.C.]

Specific Condition No.7

Permitted Capacity. The maximum steam production rate shall not exceed ~~190,000~~ 200,000 pounds steam per hour (on a 4-hour block arithmetic average).

{Permitting Note: The nominal capacity of Unit 4 is 600 tons per day and has been determined to be greater than 250 tons per day, thus classifying the unit as a "large MWC unit" under NSPS - 40 CFR 60, Subpart Eb.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., 40 CFR 60, Subpart Eb, and Design]

A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

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

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Modification and all copies were sent electronically (with Received Receipt) before the close of business on _____ to the persons listed below:

- Barry M. Boldissar, Hillsborough County DSWM: boldissarb@hillsboroughcounty.org
Thomas Smith, Hillsborough County DSWM: smitht@hillsboroughcounty.org
Jim Little, U.S. EPA Region 4, Atlanta GA: little.james@epa.gov
Katy Forney, U.S. EPA Region 4, Atlanta GA: forney.kathleen@epa.gov
Mike Halpin, DEP Siting Office: mike.halpin@dep.state.fl.us
Mara Nasca, DEP SWD: mara.nasca@dep.state.fl.us
Jerry Campbell, Hillsborough County EPC: Campbell@epchc.org
Joseph Treshler, P.E., Covanta: joseph_treshler@covantaenergy.com
Steve Goff, Covanta: sgoff@covantaenergy.com
Brian Bahor, Covanta: brian_bahor@covantaenergy.com
Peter Young, Covanta: pyoung@covantaenergy.com
Dan Strobridge, CDM: strobridge@cdm.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 3, 2007

Electronically sent – Received Receipt requested.

boldissarb@hillsboroughcounty.org

Mr. Barry M. Boldissar, Director
Hillsborough County Department of Solid Waste Management
601 East Kennedy Boulevard
Tampa, Florida 33602

Re: Hillsborough County Resource Recovery Facility
DEP File No. 0570261-009-AC (PSD-FL-369A)
Modifications to Control Equipment on Unit No. 4


Dear Mr. Boldissar:

Enclosed are documents indicating the Department's intent to issue an air construction permit to modify certain specific conditions of the previously issued air construction permit (0570261-008-AC) for Unit 4 at the Hillsborough County Resource Recovery Facility. The documents include: the "Intent to Issue Air Construction Permit Modification"; the "Public Notice of Intent to Issue Air Construction Permit Modification"; the "Technical Evaluation and Preliminary Determination"; and the "Draft Permit Modification."

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven (7) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any other written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero, Program Administrator, South Permitting at the above letterhead address. If you have any questions, please call Teresa Heron at 850/921-9529 or Mr. Linero at 850/921-9523.

Sincerely,


for Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/th

Enclosures

In the Matter of an
Application for Permit by:

Hillsborough County
Department of Solid Waste Management
601 East Kennedy Boulevard
Tampa, Florida 33602

Authorized Representative:

Mr. Barry M. Boldissar, Director

DEP File No. 0570261-009-AC
Draft Permit Modification No. PSD-FL-369A
Modification of Permit No. 0570261-007-AC
Hillsborough County Resource Recovery Facility
Modification of Control Equipment - Unit 4

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of draft permit modification attached) for the project, detailed in the application specified above, for the reasons stated below.

The applicant, Hillsborough County (the County), operates the Hillsborough County Resource Recovery Facility located at 350 North Falkenburg Road in Tampa. The County currently holds an Air Construction Permit No. 0570261-007-AC (PSD-FL-369) pursuant to the Rules for the Prevention of Significant Deterioration (PSD) to install Unit 4 (a municipal waste combustor presently under construction) at the facility. On June 11, 2007 the County submitted an application to modify the Air Construction (PSD) Permit to allow installation of the Covanta Low NO_x Process and to increase steam production. There are no air pollution emissions increases associated with the request.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification is required.

The Department intends to issue this air construction Permit Modification based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit Modification. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final air construction permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of the enclosed Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed Permit Modification and require, if applicable, another Public Notice.

The Department will issue the Permit Modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless 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 appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention in a proceeding (initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

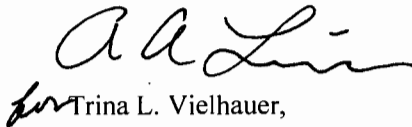
A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the 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 the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when 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 indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department 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 in this proceeding.

Executed in Tallahassee, Florida.


for Trina L. Vielhauer,
Chief Bureau of Air Regulation

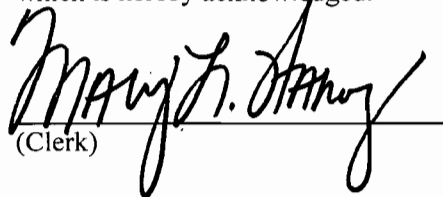
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Draft Air Construction Permit Modification, Technical Evaluation and Preliminary Determination, Intent to Issue an Air Construction Permit Modification, and Public Notice of Intent to Issue an Air Construction Permit Modification, and all copies were sent electronically (with Received Receipt) before the close of business on **August 3, 2007** to the person(s) listed below.

Barry M. Boldissar, Hillsborough County DSWM boldissarb@hillsboroughcounty.org
Thomas Smith, Hillsborough County DSWM smitht@hillsboroughcounty.org
Jim Little, U.S. EPA Region 4: little.james@epa.gov
Katy Forney, U.S. EPA Region 4: forney.kathleen@epa.gov
Mike Halpin, DEP Siting Office mike.halpin@dep.state.fl.us
Mara Nasca, DEP SWD mara.nasca@dep.state.fl.us
Jerry Campbell, Hillsborough County EPC campbell@epchc.org
Joseph Threshler, P.E., Covanta joseph_treshler@covantaenergy.com
Steve Goff, Covanta, sgoff@CovantaEnergy.com
Brian Bahor, Covanta, brian_bahor@covantaenergy.com
Peter Young, Covanta, pyoung@covantaenergy.com
Dan Strobridge, CDM, strobridgeDE@CDM.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.


(Clerk)

8/3/07
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Hillsborough County Resource Recovery Facility Unit 4

DEP File No. 0570261-009-AC (PSD-FL-369A)

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to modify the planned nitrogen oxides (NO_x) control equipment for the previously approved Unit 4 at the Hillsborough County Resource Recovery Facility located southeast of Tampa, west of I-75 and near Brandon. A review under the Rules for the Prevention of Significant Deterioration (PSD) of Air Quality and a determination of best available control technology (BACT) were previously conducted. The applicant's address is Hillsborough County Department of Solid Waste Management, 601 East Kennedy Boulevard, Tampa, Florida 33602.

Unit 4 is a nominal 600 tons per day municipal waste combustor and is presently under construction. The Department previously determined that BACT for NO_x is 110 parts per million by volume, dry corrected to 7 percent oxygen (ppmvd @7% O₂) of NO_x on a 24-hour average and 90 ppmvd @7% O₂ on a 12-month average, rolled monthly. The previously approved controls to achieve these values included a flue gas recirculation (FGR) system and a urea-based selective non catalytic reduction (SNCR) system.

The operator, Covanta, supplies much of the equipment used at the facility. Covanta now proposes to meet the approved BACT limits for NO_x by its recently developed Low NO_x (LN) combustion system in lieu of the FGR system and employing an ammonia-based SNCR system instead of one based on urea.

For reference, the overall pollution control equipment will now consist of: a spray dryer (SD) with lime injection to absorb MWC acid gases; an activated carbon injection (ACI) system to adsorb MWC organics and mercury (Hg); a fabric filter (FF) baghouse to remove particulate matter, including absorption/adsorption reagent; an LN system to limit NO_x formation; and an ammonia based SNCR system to destroy NO_x. Continuous emissions monitoring systems (CEMS) are required for CO, NO_x, SO₂ and Hg are required as well as a continuous opacity monitoring system (COMS).

The County also requests a modification of the maximum steam production limit from 190,000 to 200,000 pounds per hour based on improved cycle efficiency related to the project changes. There are no changes proposed in the approved emission limitations. No additional ambient air quality analysis is required.

The Department will issue the Final Air Construction Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of the enclosed Public Notice of Intent to Issue Air Construction Permit Modification. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed Permit Modification and require, if applicable, another Public Notice.

The Department will issue the Permit Modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee,

Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless 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 appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention in a proceeding (initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the 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 the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when 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 indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Department'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.

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

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:

Dept. of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32399-2400 Telephone: 850/488-0114 Fax: 850/921-9533	Dept. of Environmental Protection Southwest District Office 13051 North Telecom Parkway Temple Terrace, Florida 33637-0926 Telephone: 813/632-7600 Fax: 813/744-6458	Hillsborough County Environmental Protection Commission 3629 Queen Palm Drive Tampa, Florida 33619-1309 Telephone: 813/627-2600 Fax: 813-627-2660
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The complete project file includes the permit application, draft air construction permit modification, technical evaluation, and the information submitted by the authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Program Administrator, South Permitting Section at 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 or call 850/488-0114 for additional information. Key correspondence, the draft permit modification and the technical evaluation can be accessed at the following web page:
www.dep.state.fl.us/Air/permitting/construction/hillsborough.htm

**ADDENDUM TO
TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Hillsborough County Resource Recovery Facility Unit 4
Nominal 600 Tons per Day Municipal Waste Combustor
Modification of Nitrogen Oxides Control Equipment

DEP File No. 0570261-009-AC (PSD-FL-369A)



Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

August 3, 2007

(Addendum to Document issued May 24, 2006)

**ADDENDUM TO
TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Hillsborough County Resource Recovery Facility Unit 4
Nominal 600 Tons per Day Municipal Waste Combustor
Modification of Nitrogen Oxides Control Equipment

DEP File No. 0570261-009-AC (PSD-FL-369A)



Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

August 3, 2007

(Addendum to Document issued May 24, 2006)

1. BACKGROUND

Hillsborough County (the County) owns and Covanta Energy operates the resource recovery facility (HCRRF), which is located southeast of Tampa, west of I-75, and north of the Crosstown Expressway near Branford. The existing facility consists of three municipal waste combustors (MWCs), each having a nominal design rate capacity of 400 tons per day (TPD) of municipal solid waste (MSW). The location of the Hillsborough County RRF is shown in Figure 1.



Figure 1. Location and Aerial View from Southeast of the Hillsborough County RRF

On October 3, 2006 the Department issued the Final Permit to the County to construct a nominal 600 tons per day municipal waste combustor (MWC) designated as Unit 4 at HCRRF. The permit and the associated documents including the previous Technical Evaluation and Preliminary Determination are accessible at: www.dep.state.fl.us/Air/permitting/construction/hillsborough.htm

The previously issued Technical Evaluation and Preliminary Determination (TEPD) includes an assessment of the best available control technology (BACT) for key pollutants as well as technology to comply with the requirements of 40 CFR 60, Subpart Eb - Standards of Performance for Large Municipal Waste Combustors.

The permitted emission limitations are given in the table on the following page. The equipment originally proposed by the County and approved by the Department to meet the BACT and Subpart Eb requirements or to avoid triggering a review under the Rules for the Prevention of Significant Deterioration (PSD) consists of:

- A spray dryer (SD) with lime injection to absorb MWC acid gases;
- An activated carbon injection (ACI) system to adsorb MWC organics and mercury (Hg)
- A fabric filter (FF) baghouse to remove particulate matter, including absorption/adsorption reagent
- A flue gas recirculation (FGR) system to limit NO_x formation; and
- A urea-based selective non-catalytic reduction (SNCR) system to further destroy NO_x.

Continuous emissions monitoring systems (CEMS) are required for CO, NO_x, SO₂ and Hg as well as a continuous opacity monitoring system (COMS).

Table 1. Emission Limits Applicable to Hillsborough County RRF Unit 4

Pollutant	Emission Limit	Measurement Basis	Limit Basis
NO _x	110/90 ppmvd	24-hr/12-month CEMS	BACT
CO	100/80 mg/dscm	4-hr/30-day CEMS	BACT/Eb
MWC Acid Gases (SO ₂ /HCl)	26/25 ppmvd*	24-hr CEMS/Stack Test	BACT/Eb
MWC Metals/PM/PM ₁₀	12 mg/dscm	Stack Test	Avoid PSD
Ozone as VOC	NA	NA	NA
Sulfuric Acid Mist	NA	NA	NA
Fluorides (F)	NA	NA	NA
Lead (Pb)	140 µg/dscm	Stack Test	Subpart Eb
Mercury (Hg)	28 µg/dscm*	Quarterly Stack Test	Avoid PSD
Cadmium (Cd)	10 µg/dscm	Stack Test	Subpart Eb
MWC Organics (dioxin/furan)	13.0 ng/dscm	Stack Test	BACT/Eb
Ammonia (NH ₃)	15/10 ppmv	260/195 mmBtu/hr Stack Test	PM, Opacity
Opacity	10 percent	6-minute COMS	Subpart Eb

* Alternative 85 percent removal requirement applies.

2. NEW REQUEST

On June 11, 2007 the Department received a request from the County to modify the approved equipment required to meet the BACT limitation for NO_x. The previously approved equipment consists of a FGR system and a urea-based SNCR system. The rationale for the previously selected equipment is given in Section 4.3 of the previously issued TEPD dated May 24, 2006.

The County proposes to replace the FGR requirement with a system called Low NO_x (LNTM) that was recently developed and tested at other facilities by Covanta. The County also proposes to install an ammonia based SNCR system to be supplied by Covanta in lieu of a urea based SNCR system that would have been supplied by Fueltech.

With the changes, Covanta will accept responsibility for meeting the permitted emission limitation to which it did not previously agree. According to Covanta, Fueltech was not willing to guarantee the permitted NO_x limitation of 90 ppmvd on a 12-month basis. The following analysis is an update to Section 4.3 of the previously issued TEPD. Most of the write-up in the first section below was provided by Covanta. A second section includes an update prepared by the Department following further research since issuance of the earlier review.

3. NO_x Formation and Control Update

Combustion Management

The quantity of excess air for combustion and where it is used in a combustion process are both known to have an impact on the amount of fuel NO_x and thermal NO_x. The strategic management of the combustion process is a known method to reduce NO_x emissions.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION ADDENDUM

Conventional mass burn combustion uses between 80 and 100 % excess air with the majority of this excess air being supplied as underfire air (introduced below the grate). Overfire air is typically introduced immediately above the grate to promote combustion of volatile gases. This approach provides good combustion efficiency as indicated by low carbon monoxide levels however NO_x is relatively high due to elevated fuel NO_x and thermal NO_x .

A combustion management system that uses less excess air in strategic locations can reduce both fuel NO_x and thermal NO_x . Less underfire air can promote effective conversion of carbon to volatile gases that are the source of energy for the combustion process while also minimizing the conversion of fuel nitrogen to NO_x . Chemical intermediates such as cyanide and ammonia are formed instead of NO_x . The introduction of overfire air at an elevated location can avoid the direct formation of thermal NO_x while also enabling the potential of these chemical intermediates to either convert to nitrogen or to even promote NO_x reduction.

A combustion management system that uses both mechanical components and an automated combustion control system is recognized as a technically proven NO_x management system that can reduce the amount of NO_x from the combustion process. This approach has an inherent advantage in achieving both low NO_x and NH_3 stack emissions because less reagent (urea or ammonia) is needed.

For reference, similar approaches to those described above are used in other industries such as the power and cement industries. For example, in the power industry systems are available such as reburn and separate overfire air that accomplish the objectives described above. Staged fuel and staged air combustion are practiced by cement kiln operators for the same reasons.

Covanta has developed and tested its own process that is described in Attachment A and which it proposes to install on Unit 4. The Department agrees that given the lower NO_x formation, it will be possible to use less reagent to meet the Department's NO_x BACT limit and it will also be easier to meet the NH_3 emission limits.

Enhanced SNCR

There are further enhancements that can allow additional reduction. These include but are not limited to:

1. Excess reagent injection and tail end scrubbing to remove or recover the excess ammonia;
2. Infrared camera and process controls in conjunction with the many injectors to optimize use of reagent with respect to three dimensional furnace temperature profile;
3. Tunable diode laser (TDL) to identify areas of excess ammonia and adjust the injectors and total reagent usage accordingly and;
4. Installation of a small amount of catalyst downstream of the furnace to further destroy NO_x and excess ammonia.

The first three enhancements were discussed in the previous TEPD. The last one was theorized in the previous document but subsequently observed in practice by Department personnel during a visit at the Brescia facility in Italy.

The Brescia facility has three mass burn units that incorporate Martin GmbH grate technology, FGR and SNCR. The operator, ASM Brescia, installed a single stage "high dust" selective catalytic reduction (SCR) system within an expanded economizer section of Brescia Unit 2 in the

first-of-its-kind demonstration. The three units are operated to achieve 80 milligrams of NO_x per dry cubic meter at 11% oxygen (mg/dscm). With the single stage SCR system in place, Unit 2 exhibits lower ammonia emissions than Units 1 and 3. Further details are given in Attachment B.

Because only a small section of catalyst is used, the Department considers the technology to be a form of enhanced SNCR rather than an SCR system of the kind described elsewhere in the previous evaluation. Typically a full SCR system is installed downstream of all the other gas treatment systems following reheat of the cleaned gases. The alternative of a large multi-stage high dust SCR system is possible but has not yet been demonstrated. The Brescia single stage installation is the first step on that path.

3. Changes to Existing Permit

Only minimal changes to the previously issued permit are required. These include specification of the Covanta LNTM system in lieu of the FGR system. Although the County had specified a urea-based SNCR system, the Department had already permitted use of a urea-based or an ammonia-based system.

The County requested an increase in maximum steam capacity from 190,000 to 200,000 pounds per hour with no changes to mass or concentration based emission limits and no changes to the nominal ratings in the permit.

In response to a request for additional information, Covanta explained (by letter dated July 25 2007 to the Hillsborough County Environmental Protection Commission) that they do not expect an increase in emissions for the following reasons:

“Elimination of the FGR system and the decrease in the amount of reagent ammonia and transport water being required result in an overall decrease in the total gas flow through the combustion unit of approximately 12 percent (%). This results in an increase in furnace efficiency of approximately 5%, which in turn generates more steam while combusting the same amount of waste. Since there is no increase in the amount of fuel being consumed there is no increase in emissions being generated.”

The plant has not yet been constructed and the potential to emit (PTE) of air pollutants based on the issued permit is unchanged. The explanation by Covanta provides reasonable assurance that the unit will be comply with the same limits while making more steam.

The Department will modify the permit accordingly.

4. Conclusion

The Department will modify the permit as requested by the County. According to the information provided by Covanta, the main effects of the changes in the NO_x control system are: less reagent will be utilized; less ammonia will be emitted; and more steam will be produced.

Both the Covanta LNTM system and the single stage “dusty side” SCR systems are available for consideration by applicants and agencies when conducting BACT determinations.

Overview

The Covanta LN™ process, which is patent pending, involves modifications to the combustion air system of the municipal waste combustor (MWC), combined with modifications to the combustion monitoring and controls systems, to achieve substantial reductions in NO_x formation. The Covanta LN™ process when combined with an SNCR system can achieve the lower NO_x emissions required by the PSD permit issued for Hillsborough County’s Expansion Project. The Facility’s existing SNCR control system will be integrated with the LN™ combustion air system controls to maximize the NO_x reduction and minimize ammonia slip.

Process Description

MWCs typically employ a moving grate with two major sources of combustion air. Primary air (also called underfire air) is supplied through plenums located under the grate, and is forced through the grate to dry and combust the waste. The quantity of primary air is typically adjusted to minimize excess air during the combustion of the waste on the grate, while maximizing burnout of carbonaceous materials in the waste bed. Secondary air (also called overfire air) is injected through nozzles located in the furnace waterwalls immediately above the grate, and provides turbulent mixing to complete the combustion process. Secondary air provides the majority of the excess air to the combustion process.

Refer to the following figure. With the Covanta LN™ process, the secondary air stream is reduced, and a tertiary air stream is introduced through a new series of nozzles, installed in the MWC furnace waterwalls at a higher elevation in the furnace. The distribution of air between the primary, secondary and tertiary streams is controlled to yield the optimal gas composition and temperature to minimize NO_x and control combustion. The control takes into account the heating value of the waste and the fouling condition of the furnace.

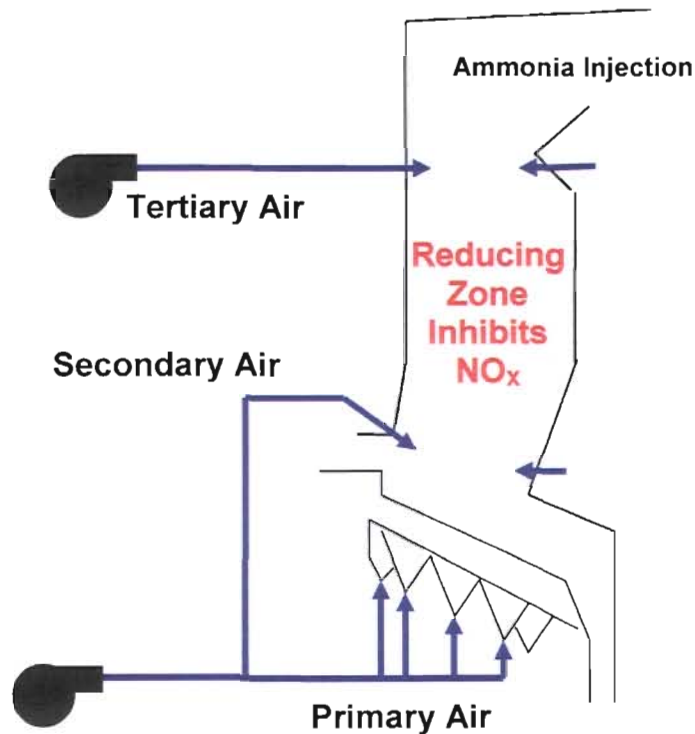


Figure A-1. Principle of Operation of the Covanta LN™ System

The combination of these combustion changes yields a slight increase in furnace efficiency (more steam per ton of MSW fired).

The design of the tertiary air nozzles and their positioning in the furnace is important to the Covanta LN™ process performance. For the Hillsborough expansion unit, the new tertiary air nozzles will be located on the right, left, and front waterwalls of the furnace. The rear waterwall could not be used without substantial modifications to the furnace design. The tertiary air achieves complete coverage of the furnace cross-section to ensure good mixing with the combustion gases. The tertiary air completes the combustion process, and yields uniform flue gas temperature and velocity profiles, which improves the performance and reliability of downstream boiler equipment.

Covanta utilizes computational fluid dynamic (CFD) modeling to determine the size and position of the new nozzles. CFD modeling is an advanced design tool based on fundamental calculations of mass and energy balances, fluid flow, and chemical reactions. Over the last decade CFD modeling has become more widespread in the energy industry, although it has primarily been applied to homogeneous fuel and gas phase systems. The complex, highly heterogeneous nature of waste combustion requires the most advanced, sophisticated modeling techniques. Covanta has been developing CFD models of MWC systems for over five years, and are the world's leader in this area.

The Covanta LN™ process will be combined with the Facility's existing aqueous ammonia SNCR system. Combining SNCR with the Covanta LN™ process yields a number of synergistic effects which enhances the performance of the SNCR system. These enhancements minimize the number of SNCR nozzles required, reduce the amount of carrier water needed with the ammonia, and reduce the amount of unreacted ammonia that exits the boiler, which is commonly called "ammonia slip." The SNCR control system will also be integrated with the LN™ combustion controls to maximize the NO_x reduction and minimize the ammonia slip.

After installation of the Covanta LN™ process equipment, field optimization of the system will be done to set up the new combustion controls and confirm the tertiary air distribution. Advanced instrumentation to measure temperatures in the furnace, view refractory condition on-line, and continuously measure ammonia slip, will be employed during the start-up optimization period.

Commercial Performance Data

The Covanta LN™ process was developed and demonstrated in two commercial installations in the U.S. At the Bristol WTE facility (in Bristol, CT), equipment was installed on one unit in April 2006 to enable testing of the Covanta LN™ technology. The Bristol unit employs a Martin grate, similar to that being designed for Hillsborough. This work was done in collaboration with Covanta's technology partners, Martin GmbH. In November 2006, one unit at the Hempstead WTE facility (in Hempstead, NY) was retrofitted with the Covanta LN™ technology. The Hempstead unit employs a 900 TPD Deutsch Babcock Anlagen (DBA) Roller Grate, which is another mass-burn technology for combusting MSW.

For the Hillsborough Expansion, Covanta proposes to install an aqueous ammonia SNCR system with the LN™ process. This is the same design approach that was tested at Bristol. Between the Bristol and Hempstead facilities, Covanta has accumulated over 1500 hours of operation with the LN™ process. At Bristol the LN™ process was extensively tested. During May, June and July of last year, the Bristol unit the LN™ process was operated for a total of 19 days.

More recently, in May 2007, the unit ran using the LN™ process for 14 days. The results of these operating periods demonstrate the system capabilities, and are summarized in the following table:

Table A-1. Bristol LNTM System Performance Summary (Average Values)

Month	Days	Steam Flow	Aqueous NH ₃	NO _x	CO	NH ₃ Slip
		(lb/hr)	(gph)	(ppm 7% O ₂)	(ppm 7% O ₂)	(ppm 7% O ₂)
May 2006	4	78,000	9.3	62	24	1.2
June 2006	10	78,000	12.6	62	19	2.4
July 2006	5	74,000	8.6	72	25	1.4
May 2007	14	76,000	13.0	59	30	4.8

At Hempstead, the LNTM unit was tested in December 2006 and January 2007, and is currently operating with this process. The following table presents representative data from the Hempstead LNTM unit with the SNCR system in operation.

Table A-2. Hempstead LNTM System Performance Summary (Average Values)

Test	Steam Flow	Urea	NO _x	NH ₃ Slip
	(lb/hr)	(gph)	(ppm 12% CO ₂)	(ppm 12% CO ₂)
1	235,000	12	90	n/a
2	235,000	15	65	n/a

The SNCR system at Hempstead uses urea as the NO_x reduction reagent. Covanta operates all types of SNCR systems, including those using aqueous ammonia, anhydrous ammonia, and urea. We have found that the type of reagent is not the major factor in the performance of the system to maximize NO_x reduction and minimize ammonia slip. The most important parameters are the location of the injection nozzles in the furnace, the design of the nozzles to ensure good mixing of the reagent with the flue gas, and the design of the control system.

In combination with the LNTM system, Covanta integrates the SNCR system design and controls to maximize mixing of the reagent with the flue gas in the optimum temperature window for NO_x reduction. Covanta is recommending the use of aqueous ammonia because it is safer than anhydrous ammonia, lower cost than a urea system, and the existing Facility already includes an aqueous ammonia system for SNCR that can be extended to the Expansion with supplemental scope.

Compliance with Existing PSD Permit Requirement

The Hillsborough Expansion Project will comply with the NO_x and NH₃ emission limits contained in the PSD permit when using the Covanta LNTM system with the balance of facility operations.

Effect on Other Regulated Pollutants

The Hillsborough Expansion Project will comply with the other emission limits contained in the PSD permit and the Covanta LNTM system will not cause an increase in the emissions of any regulated air pollutant.

ATTACHMENT B – ASM BRESCIA WASTE TO ENERGY FACILITY

The ASM Brescia Waste-to-Energy (WTE) Plant is located in the Lombardia province of Italy as shown in the following map. Brescia lies adjacent to the Venice/Milan Autostrada and is about midway between Milan and Verona as shown in the map on the left hand side of the following figure. The photograph in the middle is of the front of the plant. The one on the right hand side is of a section of the economizer where some catalyst has been installed as discussed below.



Figure B-1. Brescia, Italy. Front of ASM Brescia Plant. Single Stage SCR Section

An off-site survey of the facility was conducted on July 3, 2006. On July 4 a meeting was held with the Director of the ASM Brescia WTE Plant who provided a complete rundown of their operations, brochures, reports, and a tour.

All three units operate with SNCR systems. They have Martin moving grates, flue gas recirculation (FGR), spray dryer/fabric filters, and activated carbon injection systems. They operate each unit at approximately $80 \text{ mg NO}_x/\text{m}^3$ and were doing so on the day of the visit.

They have no plume issues under their present operations. The opacity was effectively zero. Any potential plume problems from achieving the relatively low NO_x values are abated by two fairly recent developments at the plant.

Firstly, they are operating at a lower HCl emission limit following Italy's implementation of certain European Union requirements. Their typical emissions are $4 \text{ mg HCl}/\text{m}^3$ and the limit is $10 \text{ mg}/\text{m}^3$.

Secondly, Unit 2 is equipped with the SNCR system in the furnace plus a thin single stage "dusty side" SCR system within the economizer section. It is only about 60 cm in depth (and $\sim 4 \times 13$ meters cross-section). The line was originally designed for that possibility and provided for something like 5 stages of "dusty-side" SCR. They only use one stage. The most obvious benefits of this "trim" SCR system are reduction of reagent consumption and ammonia slip with minimal pressure drop.

They achieve the same $80 \text{ mg NO}_x/\text{m}^3$ exhaust value on all three lines. Ammonia emissions are much less for the line with the SCR piece than the ones that rely only upon SNCR to meet the same NO_x emission level.

The Brescia WTE plant demonstrates that it is possible to reduce NO_x emissions to very low values without causing detached plumes while using semi-dry pollution control equipment (spray dryer/fabric filter). Furthermore, the Brescia WTE plant demonstrates the technical feasibility of combining SNCR with a small SCR piece to achieve both low emissions and minimal ammonia slip. The plant director also provided his favorable opinions regarding the benefits of VOC and dioxin/furan destruction.

DRAFT

August XX, 2007

Electronically Sent – Received Receipt requested

boldissarb@hillsboroughcounty.org

Mr. Barry M. Boldissar, Director

Hillsborough County Department of Solid Waste Management

601 East Kennedy Boulevard

Tampa, Florida 33602

Re: Hillsborough County Resource Recovery Facility

DEP File No. 0570261-009-AC (PSD-FL-369A)

Installation of the Covanta Low NO_x Process in Unit No. 4

Dear Mr. Boldissar:

The Department is in receipt of your modification request submitted by Covanta Inc to modify the Air Construction (PSD) Permit to allow installation of the Covanta Low NO_x Process. The request is acceptable to the Department and the permit is hereby modified. The changes are shown ~~strikethrough~~ and double-underlined as follows:

PROJECT

The permittee, Hillsborough County, proposes to construct a new 600 ton per day (TPD) Municipal Waste Combustor referred to as Unit 4 at the existing facility. The nominal design rate capacity is 600 tons MSW per day, with a nominal heat input of 288 MMBtu per hour and nominal steam production of ~~163,780~~ 170,790 pounds per hour (maximum ~~190,000-200,000~~ lb/hr). The new unit will be equipped with two natural gas-fired auxiliary burners, each with a nominal heat input of 50 MMBtu per hour. The new unit will be installed at the existing site. The flue for the new boiler is already encased in the existing stack. With the addition of the fourth unit, the existing 220 feet tall stack will contain four active flue streams. With the addition of this unit, the site capacity will increase from approximately 1,200 TPD to 1,800 TPD. The site's steam electric generating capacity will be increased from 39 MW to 47 MW (nominal).

The existing ash building and handling system will be expanded. Two new lime storage silos and a new activated carbon storage silo will be constructed for Unit 4.

Unit 4 will be a mass burn unit incorporating much of the same technology as the existing units including: combustion on a reverse-reciprocating grate system; ash discharge system; energy recovery through the furnace waterwall, superheater and economizers; electrical power production; and a pollution control system consisting of a spray dryer, fabric filter, activated carbon injection system and a selective non-catalytic reduction (SNCR). In addition, the new unit will incorporate combustion controls or (Covanta LNTM system) flue gas recirculation for energy efficiency and pollution reduction.

SECTION III. EMISSION UNIT SPECIFIC CONDITIONS
B. Municipal Waste Combustor & Auxiliary Burners - Unit 4

Emissions Unit 107

Description: Emissions unit 107 consists of a nominal 600 TPD mass-burn municipal waste combustor (MWC) with two nominal 50 mmBtu/hr natural gas-fired auxiliary burners. The project will also include: a new nominal 17 megawatt (MW) steam turbine-electrical generator; expansion of the ash handling and refuse building; a new transformer yard; a new lime silo; an ammonia or urea reagent storage tank; and a new settling basin. Exhaust from the new unit will be directed to a separate flue already constructed within the existing 220 foot stack.

Steam Capacity: The nominal steam production rate is 163,780 pounds of steam per hour. The maximum steam production limit is ~~190,000~~ 200,000 lb steam/hr (4-hour block average). The nominal heat input is approximately 288 mmBtu/hour.

Controls: Controls consist of: efficient combustion on the grate and furnace; strategic management of combustion air (Covanta LN™ system) or flue gas recirculation (FGR); a spray dryer/absorber in conjunction with a fabric filter (SD/FF) for control of acid gases, particulate matter, and most metals; activated carbon injection (ACI) to enhance mercury (Hg) removal; selective non-catalytic reduction (SNCR) by ammonia or urea injection for NO_x control.

Stack Parameters: The Department may require the permittee to perform additional air dispersion modeling should the actual specified stack dimensions change. The following summarizes the exhaust characteristics:

<u>Fuel</u>	<u>Heat Input Rate</u>	<u>Exhaust Temp., °F</u>	<u>Flow Rate ACFM</u>
MSW	~288 mmBtu/hour	270° F	~125,000

Continuous Monitors: The unit is equipped with continuous emissions monitoring systems (CEMS) to measure and record NO_x, CO, SO₂, and Hg as well as instrumentation to monitor steam flow, flue gas flow rate, oxygen, temperature, and opacity.

Specific Condition No. 4

Control Equipment: The owner or operator shall install, operate and maintain the following air pollution control equipment consistent with the manufacturers' specifications:

NO_x Controls: Combustion air management system (Covanta LN™ system) or a flue gas recirculation system (FGR) will be used to limit NO_x formation. An ammonia or urea-based selective non-catalytic reduction (SNCR) system will be employed for the destruction of NO_x.

MWC Acid Gas Control: A spray dryer (SD) with lime injection will be installed to absorb MWC acid gases.

MWC Organics and Mercury (Hg): An activated carbon injection (ACI) system will be installed to adsorb MWC organics and mercury (Hg).

Particulate Matter (PM/PM₁₀): A fabric filter (FF) baghouse, including absorption/adsorption reagent, will be installed to remove particulate matter.

[BACT Determination, and Rules 62-4.070(1), and (3), F.A.C.]

Specific Condition No.7

Permitted Capacity. The maximum steam production rate shall not exceed ~~190,000~~ 200,000 pounds steam per hour (on a 4-hour block arithmetic average).

{Permitting Note: The nominal capacity of Unit 4 is 600 tons per day and has been determined to be greater than 250 tons per day, thus classifying the unit as a "large MWC unit" under NSPS - 40 CFR 60, Subpart Eb.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., 40 CFR 60, Subpart Eb, and Design]

A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

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

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Modification and all copies were sent electronically (with Received Receipt) before the close of business on _____ to the persons listed below:

Barry M. Boldissar, Hillsborough County DSWM: boldissarb@hillsboroughcounty.org
Thomas Smith, Hillsborough County DSWM: smitht@hillsboroughcounty.org
Jim Little, U.S. EPA Region 4, Atlanta GA: little.james@epa.gov
Katy Forney, U.S. EPA Region 4, Atlanta GA: forney.kathleen@epa.gov
Mike Halpin, DEP Siting Office: mike.halpin@dep.state.fl.us
Mara Nasca, DEP SWD: mara.nasca@dep.state.fl.us
Jerry Campbell, Hillsborough County EPC: Campbell@epchc.org
Joseph Treshler, P.E., Covanta: joseph_treshler@covantaenergy.com
Steve Goff, Covanta: sgoff@covantaenergy.com
Brian Bahor, Covanta: brian_bahor@covantaenergy.com
Peter Young, Covanta: pyoung@covantaenergy.com
Dan Strobridge, CDM: strobridgedede@cdm.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

Harvey, Mary

From: Harvey, Mary
Sent: Monday, August 06, 2007 11:56 AM
To: 'boldissarb@hillsboroughcounty.org'; 'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com'; 'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com'; 'strobridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT
Attachments: 0570261.009.AC.D_.pdf.zip

Tracking:	Recipient	Read
	'boldissarb@hillsboroughcounty.org'	
	✓ 'smitht@hillsboroughcounty.org'	
	✓ 'little.james@epa.gov'	
	✓ 'forney.kathleen@epa.gov'	
	✓ Halpin, Mike	Read: 8/6/2007 12:10 PM
	✓ Nasca, Mara	Read: 8/6/2007 12:01 PM
	✓ 'campbell@epchc.org'	
	✓ 'joseph_treshler@covantaenergy.com'	
	✓ 'sgoff@CovantaEnergy.com'	
	'brian_bahor@covantaenergy.com'	
	✓ 'pyoung@covantaenergy.com'	
	✓ 'strobridgeDE@CDM.com'	
	✓ Linero, Alvaro	
	✓ Heron, Teresa	Read: 8/6/2007 1:00 PM
	✓ Adams, Patty	Read: 8/6/2007 1:06 PM
	✓ Gibson, Victoria	Read: 8/6/2007 11:56 AM

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide

8/6/2007

Harvey, Mary

From: Nasca, Mara
To: Harvey, Mary
Sent: Monday, August 06, 2007 12:01 PM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: 'boldissarb@hillsboroughcounty.org'; 'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com'; 'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com'; 'strobridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT
Sent: 8/6/2007 11:56 AM

was read on 8/6/2007 12:01 PM.

Harvey, Mary

From: Treshler, Joseph [Joseph_Treshler@CovantaEnergy.com]
To: undisclosed-recipients
Sent: Monday, August 06, 2007 11:56 AM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: Joseph_Treshler@CovantaEnergy.com
Subject:

was read on 8/6/2007 11:56 AM.

Harvey, Mary

From: Treshler, Joseph [Joseph_Treshler@CovantaEnergy.com]
Sent: Monday, August 06, 2007 11:59 AM
To: Harvey, Mary
Subject: RE: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Received

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, August 06, 2007 11:56 AM
To: boldissarb@hillsboroughcounty.org; smitht@hillsboroughcounty.org; little.james@epa.gov; forney.kathleen@epa.gov; Halpin, Mike; Nasca, Mara; campbell@epchc.org; Treshler, Joseph; Goff, Steve; Bahor, Brian; Young, Peter; strobridgeDE@CDM.com
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

8/6/2007

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Monday, August 06, 2007 11:56 AM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: 'boldissarb@hillsboroughcounty.org'; 'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com'; 'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com'; 'strobridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT
Sent: 8/6/2007 11:56 AM

was read on 8/6/2007 11:56 AM.

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Monday, August 06, 2007 1:06 PM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: 'boldissarb@hillsboroughcounty.org'; 'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com'; 'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com'; 'strobridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT
Sent: 8/6/2007 11:56 AM

was read on 8/6/2007 1:06 PM.

Harvey, Mary

From: Heron, Teresa
To: Harvey, Mary
Sent: Monday, August 06, 2007 1:00 PM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: 'boldissarb@hillsboroughcounty.org'; 'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com'; 'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com'; 'strobridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT
Sent: 8/6/2007 11:56 AM

was read on 8/6/2007 1:00 PM.

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Monday, August 06, 2007 12:59 PM
To: Harvey, Mary
Cc: little.james@epa.gov
Subject: Re: FW: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Thanks We got this one...

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

08/06/2007 11:57
AM

To
Kathleen Forney/R4/USEPA/US@EPA,
James Little/R4/USEPA/US@EPA

cc

Subject

FW: HILLSBOROUGH COUNTY
DEPARTMENT OF SOLID WASTE
MANAGEMENT - PROJECT
#0570261-009-AC-DRAFT

From: Harvey, Mary
Sent: Monday, August 06, 2007 11:56 AM
To: 'boldissarb@hillsboroughcounty.org';
'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov';
Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com';
'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com';
'strobebridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-
AC-DRAFT

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be

Harvey, Mary

From: THOMAS SMITH [SMITHT@HillsboroughCounty.ORG]
Sent: Monday, August 06, 2007 12:50 PM
To: Harvey, Mary
Subject: Re: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT -PROJECT #0570261-009-AC-DRAFT

Received.

Thomas G. Smith, Section Manager
Management & Environmental Services
Solid Waste Management Department
Hillsborough County, FL
Tel (813) 276-2909
smitht@hillsboroughcounty.org

>>> "Harvey, Mary" <Mary.Harvey@dep.state.fl.us> 8/6/2007 11:55 AM >>>

Dear Sir/Madam:

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Thank you,

8/6/2007

Harvey, Mary

From: Halpin, Mike
To: Harvey, Mary
Sent: Monday, August 06, 2007 12:10 PM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: 'boldissarb@hillsboroughcounty.org'; 'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com'; 'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com'; 'strobridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT
Sent: 8/6/2007 11:56 AM

was read on 8/6/2007 12:10 PM.

Harvey, Mary

From: Moore, Carol
Sent: Monday, August 06, 2007 12:10 PM
To: Harvey, Mary
Subject: RE: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Received

-----Original Message-----

From: Nasca, Mara
Sent: Monday, August 06, 2007 12:01 PM
To: Moore, Carol
Cc: Zhang-Torres
Subject: Fw: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT # 0570261-009-AC-DRAFT

Carol,

Are you covering for Pat's vacation ?

Please print this permit for the file and also reply to the email.....thanks

Sent from my BlackBerry Wireless Handheld

----- Original Message -----

From: Harvey, Mary
To: 'boldissarb@hillsboroughcounty.org' <boldissarb@hillsboroughcounty.org>; 'smittt@hillsboroughcounty.org' <smittt@hillsboroughcounty.org>; 'little.james@epa.gov' <little.james@epa.gov>; 'forney.kathleen@epa.gov' <forney.kathleen@epa.gov>; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org' <campbell@epchc.org>; 'joseph_treshler@covantaenergy.com' <joseph_treshler@covantaenergy.com>; 'sgoff@CovantaEnergy.com' <sgoff@CovantaEnergy.com>; 'brian_bahor@covantaenergy.com' <brian_bahor@covantaenergy.com>; 'pyoung@covantaenergy.com' <pyoung@covantaenergy.com>; 'strobbridgeDE@CDM.com' <strobbridgeDE@CDM.com>
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Sent: Mon Aug 06 11:55:48 2007
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

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Thank you,

Harvey, Mary

From: Strobridge, Daniel [StrobridgeDE@CDM.com]
To: undisclosed-recipients
Sent: Monday, August 06, 2007 1:33 PM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT -
PROJECT #0570261-009-AC-DRAFT

Your message

To: StrobridgeDE@CDM.com
Subject:

was read on 8/6/2007 1:33 PM.

Harvey, Mary

From: Strobridge, Daniel [StrobridgeDE@CDM.com]
Sent: Monday, August 06, 2007 1:33 PM
To: Harvey, Mary
Subject: RE: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

I have received the captioned information

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, August 06, 2007 11:56 AM
To: boldissarb@hillsboroughcounty.org; smitht@hillsboroughcounty.org; little.james@epa.gov; forney.kathleen@epa.gov; Halpin, Mike; Nasca, Mara; campbell@epchc.org; joseph_treshler@covantaenergy.com; sgoff@CovantaEnergy.com; brian_bahor@covantaenergy.com; pyoung@covantaenergy.com; Strobridge, Daniel
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

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Thank you,

Harvey, Mary

From: Linero, Alvaro
To: Harvey, Mary
Sent: Monday, August 06, 2007 2:20 PM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: 'boldissarb@hillsboroughcounty.org'; 'smitht@hillsboroughcounty.org'; 'little.james@epa.gov'; 'forney.kathleen@epa.gov'; Halpin, Mike; Nasca, Mara; 'campbell@epchc.org'; 'joseph_treshler@covantaenergy.com'; 'sgoff@CovantaEnergy.com'; 'brian_bahor@covantaenergy.com'; 'pyoung@covantaenergy.com'; 'strobridgeDE@CDM.com'
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT
Sent: 8/6/2007 11:56 AM

was read on 8/6/2007 2:20 PM.

Harvey, Mary

From: Campbell, Jerry [Campbell@epchc.org]
To: Harvey, Mary
Sent: Monday, August 06, 2007 3:17 PM
Subject: Read: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Your message

To: Campbell@epchc.org
Subject:

was read on 8/6/2007 3:17 PM.

Harvey, Mary

From: Goff, Steve [SGoff@CovantaEnergy.com]
Sent: Monday, August 06, 2007 5:49 PM
To: Harvey, Mary
Subject: RE: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

Received.

Steve Goff
Vice President of Technology Development

COVANTA
ENERGY
for a cleaner world

Covanta Energy Corporation
40 Lane Road, Fairfield, NJ 07004
973.882.4192 Fax: 973.882.4146

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Monday, August 06, 2007 11:56 AM
To: boldissarb@hillsboroughcounty.org; smitht@hillsboroughcounty.org; little.james@epa.gov; forney.kathleen@epa.gov; Halpin, Mike; Nasca, Mara; campbell@epchc.org; Treshler, Joseph; Goff, Steve; Bahor, Brian; Young, Peter; strobridgeDE@CDM.com
Cc: Linero, Alvaro; Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: HILLSBOROUGH COUNTY DEPARTMENT OF SOLID WASTE MANAGEMENT - PROJECT #0570261-009-AC-DRAFT

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8/7/2007