

EXHIBIT A

DRAFT PSD PERMIT MODIFICATION
FOR HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY
(PSD-FL-104)

Page 1, Paragraph 3

This modification to Permit No. PSD-FL-104 addresses the increased emissions of nitrogen oxides and sulfuric acid mist from the stack at the resource recovery facility. It also addresses the particulate emissions from the ash residue facility and dust suppression baghouse. Except as expressly provided in the specific conditions contained herein, all of the other provisions of Permit No. PSD-FL-104 remain in effect.

Specific Conditions


1. Specific Condition 1.a.(5) in Permit No. PSD-FL-104 establishes an emission limitation for nitrogen oxides. It is modified to read as follows:

 (5) Nitrogen Oxides: 0.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive.
2. Specific Conditions 1.a.(9) and 1.b.(2)i concerning sulfuric acid mist emission limitations and compliance test requirements are deleted.
3. Pursuant to Rule 17-2.700(3)d, FAC, a standard of 5% opacity is hereby set for the minor particulate source control equipment/baghouse (i.e., the ash residue building dust suppression system). The compliance test requirements for the ash handling facility will be waived in accordance with Rule 17-2.700(3)d, FAC.

DSD/vc:Hills-RR2

Copied: CHF/BT

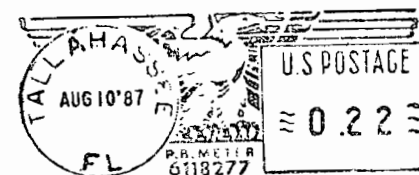
Barry Andrews

8/12/87 

CARLTON, FIELDS, WARD, EMMANUEL, SMITH, CUTLER & KENT, P.A.

P.O. DRAWER 190

TALLAHASSEE, FLORIDA 32302



CLAIR H. FANCY
DEPUTY CHIEF
BUREAU OF AIR QUALITY MANAGEMENT
DEPARTMENT OF ENVIRONMENTAL REGULATION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400





(813) 272-6674

MARC J. ROGOFF
RESOURCE RECOVERY PROGRAM ADMINISTRATOR
DEPARTMENT OF SOLID WASTE

DIVISION OF
PUBLIC WORKS AND SAFETY
HILLSBOROUGH COUNTY

POST OFFICE BOX 1110
TAMPA, FLORIDA 33601

HILLSBOROUGH COUNTY
DEPARTMENT OF SOLID WASTE
P.O. BOX 1110
TAMPA, FLORIDA 33601



Clair Fancy
Department of Environmental Regulation
Bureau of Air Quality Monitoring
2600 Blair Stone Road
Tallahassee, Florida 32301



PM
6-9-87
Atlanta, Ga

File Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUN - 8 1987

4APT/APB-ljf

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
JUN 11 1987
BAQM

Re: Permit Modification Request for Hillsborough County RRF (PSD-FL-104)

Dear Mr. Fancy:

This is in reference to your May 5, 1987, letter transmitting a copy of Ogden Martin Systems of Hillsborough, Incorporated's May 1, 1987, request for a modification to the above-referenced permit. Their request is to raise the emission limits for nitrogen oxides and sulfuric acid mist based on recent stack test results. Your May 5, 1987, letter solicited our comments on Ogden Martin's proposed PSD permit modification.

We concur that the permit be modified in accordance with their request and justification for nitrogen oxides. However, we believe the results of their tests for sulfite concentration as an indication of sulfuric acid mist by EPA reference method 8 is biased high due to concentrations of fluoride and ammonia in the flue gases. As no acceptable test method exists for measuring sulfuric acid mist emissions from municipal solid waste incinerators, and these emissions are estimated based on sulfur dioxide concentrations, we propose that no emissions limits for sulfuric acid mist be included in the revised permit. In this case, we do not feel that such an emissions limit is appropriate since compliance with such a limit could not be determined.

If you have comments or questions regarding this letter, please contact Mike Brandon of my staff at (404) 347-2864.

Sincerely,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

copied:

Barry
Tom
Pradeep

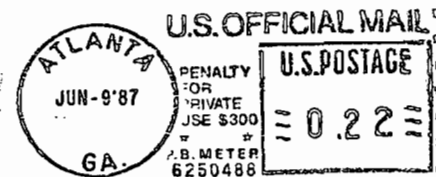
6-11-87 RBN

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

AIR-4 .

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32301



6-11-87

~~CLAIR~~
1

FYI. Return
for filing.

File
✓ the
floor Bm

Requests for a hearing must be postmarked not later than 30 days from the date of this notice and sent to:

(DER contact)

CHF

A special set of circumstances is applicable to this PSD permit application. A permit to construct the source was issued by the Power Plant Siting Board on (date) under the Florida Power Plant Siting Act. At that time, DER considered such a permit to constitute a PSD permit issued under Florida's PSD regulations, which have been approved by EPA. Such approval by EPA transferred permit signature authority for PSD sources from EPA to DER. Subsequent to the issuance of that permit, EPA determined that Power Plant Site Certifications, because of certain procedural differences, do not constitute PSD permits under the DER regulations, and thus do not satisfy the requirements of the federal Clean Air Act. In order to rectify this situation, EPA withdrew authority from DER to issue PSD permits to such sources, but delegated to DER the authority to process the PSD applications in preparation for issuance of a permit by EPA.

Since Florida had already issued a ~~construction permit~~ ^{Site Certification} to [Hillsborough/Pinellas] County, the source had begun construction prior to EPA's determination that the Florida procedure is inadequate. Consequently, EPA issued an administrative order under Section 167 of the Clean Air Act, which required [Hillsborough/Pinellas] County to either immediately apply for a PSD permit or cease construction. Because of the special circumstances surrounding this application, EPA determined that the determination of best available control technology for this source could be made as of the date of the original complete application to Florida for a Power Plant Site Certification permit. Therefore, the draft permit and preliminary determination reflect the best available control technology as of (date) , the date of that application.

ROUTING AND TRANSMITTAL SLIP

Date

1/3/85

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1.

Clair Fancy

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Attached is a suggested
public notice to
Pinellas RRF and
Hillsborough RRF
(404) 347-4253

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Roger Riff

Room No.—Bldg.

Phone No.

5041-102

U.S.G.P.O.: 1983 - 421-529/320

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

Appendix H-1, Permit History/ID Number Changes

Hillsborough County
Hillsborough County Resource Recovery Facility

DRAFT Permit No.: 0570261-002-AV
Facility ID No.: 0570261

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date ^{1,2}	Revised Date(s)
-001	MSW Incinerator #1	PA-83-19	1/1/84			6/17/86
		PSD-FL-104	7/7/86			
		AO29-206279	6/17/94	8/1/97		
		PSD-FL-121	10/14/87	3/31/88		1/20/95, 6/29/98
-002	MSW Incinerator #2	PA-83-19	1/1/84			6/17/86
		PSD-FL-104	7/7/86			
		AO29-206279	6/17/94	8/1/97		
		PSD-FL-121	10/14/87	3/31/88		1/20/95, 6/29/98
-003	MSW Incinerator #3	PA-83-19	1/1/84			6/17/86
		PSD-FL-104	7/7/86			
		AO29-206279	6/17/94	8/1/97		
		PSD-FL-121	10/14/87	3/31/88		1/20/95, 6/29/98
-100	Ash Building & Handling System	PSD-FL-121(B)	6/29/98	3/30/2003		
-101	Lime Storage Silo	PSD-FL-121(B)	6/29/98	3/30/2003		
-102	Activated Carbon Storage Silo	PSD-FL-121(B)	6/29/98	3/30/2003		

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.:

To: Facility ID No.: 0570127

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., allows Title V Sources to operate under existing valid permits that were in effect at the time of application until the Title V permit becomes effective}

[illegible]

Your query has retrieved 1 record.
Count: *1

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DER

FEB 3 1986

BAQM

II - 1

Table I-1

Revised 12/30/86

Hillsborough County Resource Project
Proposed Annual Emission Rates

Pollutant	Proposed Maximum Emission Rate (Ton/Yr)	Significant Emission Rate for PSD Applicability	Significant Emission Rate for Nonattainment Applicability
Particulate Matter (PM) (1)	90	N/A	100
Volatile Organic Compounds Hydrocarbons (VOC) (1)	44	N/A	100
Sulfur Dioxide (SO ₂)	701	40	N/A
Carbon Monoxide (CO)	395	100	N/A
Nitrogen Oxides (NO _x)	657	40	N/A
Lead (Pb)	11	0.6	
Mercury (Hg)	1.1	0.1	
Beryllium (Be)	0.003	0.0004	
Fluorides	13	3	
Sulfuric Acid Mist	17	7	
Hydrogen Chloride (HCl) (2)	854	-	

(1) Nonattainment Pollutant

~~(2) HCl is not a regulated pollutant but was included at the department's request~~

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Revised 12/30/86

Table II-1
Hillsborough County Resource Recovery Project
Source Parameters

Source	UTM-E (km)	UTM-N (km)	SO ₂ (g/s)	Stack Height (m)	Temp. (K)	Exit Vel. (m/s)	Stack Dia. (m)
PSD Sources							
Hillsborough Co. RRF	368.2	3092.7	29.6	67.0	494	16.9	3.50
Pinellas RRF 1-3	335.2	3084.1	31.5	49.1	505	26.8	2.37
McKay Bay RRF	360.0	3091.9	21.4	45.7	500	21.3	1.91
TECO Big Bend	361.9	3075.0	8598	149.4	426	15.6	7.00
NAAQS Sources							
FPC Bartow	342.4	3082.7	722.2	91.4	408	44.0	3.35
FPC Higgins	336.5	3098.5	286.7	53.0	422	10.4	3.81
FPC Anclote #1	324.9	3119.0	1631.9	152.1	416	50.0	3.66
FPC Anclote #2	324.9	3119.0	816.0	152.1	416	28.3	3.66
TECO Hooker Pt. #1)	358.0	3091.0	41.30	85.4	402	18.2	3.40
TECO Hooker Pt. #2)	358.0	3091.0	41.30	85.4	402	18.2	3.40
TECO Hooker Pt. #3)	358.0	3091.0	37.00	85.4	397	11.5	3.70
TECO Hooker Pt. #4)	358.0	3091.0	57.00	85.4	397	11.5	3.70
TECO Hooker Pt. #5)	358.0	3091.0	84.00	85.4	402	18.2	3.40
TECO Hooker Pt. #6)	358.0	3091.0	107.00	85.4	436	17.9	2.90
TECO Gannon #1	360.0	3087.5	282.5	93.3	438	22.5	3.70
TECO Gannon #2	360.0	3087.5	282.5	93.3	438	32.4	3.10
TECO Gannon #3	360.0	3087.5	321.4	93.3	427	35.4	3.20
TECO Gannon #4	360.0	3087.5	421.6	93.3	443	24.6	2.90
TECO Gannon #5	360.0	3087.5	513.4	93.3	415	20.6	4.50
TECO Gannon #6			853.6	93.3	415	23.7	5.40
General Portland	358.0	3090.6	349	44.3	473	6.6	4.72
Gardinier	363.4	3082.4	473.3	29.4	333	9.1	2.10
Gardinier	363.4	3082.4	-210.26	36.5	344	11.8	2.00

Bureau 12/30/86

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Table ~~II-1~~ (cont.)

Source	UTM-E (km)	UTM-E (km)	SO ₂ (g/s)	Stack Height (m)	Temp. (K)	Exit Vel. (m/s)	Stack Dia. (m)
<u>AMAX (Pt. No.)</u>	393.8	3096.3					
			12.0	30.5	335.1	12.0	1.37
01			3.3	24.4	315.8	8.9	1.67
02			17.6	46.3	308.6	11.0	1.76
03			29.0	45.7	315.6	15.9	1.76
05			2.8	6.1	550.2	15.3	0.40
19			1.4	3.4	605.2	20.2	0.37
20			27.1	46.3	298.0	13.1	1.76
26 - 28			2.1	10.6	605.2	15.3	0.36
29							
<u>CF Industries (Pt. No.)</u>	380.0	3115.7					
01			6.1	7.5	560.0	19.7	1.07
10			6.2	28.7	316.3	7.2	3.05
11			9.2	54.9	321.9	12.6	2.79
12			13.7	54.9	315.2	9.8	2.79
13			13.7	54.9	324.7	10.5	2.79
<u>Chloride Metals (Pt. No.)</u>	361.8	3008.3					
01			10.1	32.2	346.7	27.8	0.58
04			10.1	29.9	363.0	14.4	0.61
<u>Columbia Paving</u>	366.7	3077.8	3.7	12.2	339.7	22.3	1.37

Revised
12/30/86

V-1
Table ~~V~~-I (cont.)

Source	UTM-E (km)	UTM-E (km)	SO ₂ (g/s)	Stack Height (m)	Temp. (K)	Exit Vel. (m/s)	Stack Dia. (m)
Columbus Company	361.9	3077.8	4.8	12.6	449.7	20.0	1.24
Couch Construction	364.3	3098.1	3.3	10.4	390.8	17.2	1.41
Delta Asphalt	372.1	3105.4	4.8	8.4	381.3	20.6	1.17
Gulf Coast Lead co.	363.9	3093.8	47.2	29.6	347.4	24.9	0.62
IMC Port Sutton	360.1	3087.5	41.5	19.8	338.6	10.5	2.41
Thatcher Glass (Pt. No.)	361.2	3103.3	2.6	41.1	694.1	9.4	1.52
Furnace No. 1			2.6	41.1	656.9	11.4	1.52
Furnace No. 2							
Nitram	363.2	3089.0	3.1	27.4	505.2	10.8	1.37
National Gypsum (Pt. No.)	347.3	3082.7					
Dryer No. 1/Zone 1			0.66	12.5	388.6	8.5	1.07
Zone 2			0.66	12.5	424.7	9.1	0.91
Zone 3			0.66	12.5	330.2	9.1	0.91
Dryer No. 2/Zones 1&2			1.0	10.1	421.9	20.7	0.76
Zone 3			0.5	10.1	408.0	10.4	0.76
Zone 4			0.5	11.3	394.1	25.9	0.91

Table ~~II~~-2
Hillsborough County Resource Recovery Project
Proposed Maximum Hourly Emission Rates Used
in Modeling

<u>Pollutant</u>	<u>Emission Rates (1)</u>	
	<u>lb/ton</u>	<u>g/s</u>
Particulate Matter	0.38	3.5
Sulfur Dioxide	3.2	29.6
Carbon Monoxide	1.8	16.6
Nitrogen Oxides	3.0	27.7
Lead	0.048	0.444
Hydrocarbons (non-methane)	0.2	1.85
Mercury	0.0052	0.048
Beryllium	0.000131 0.0000131	0.000121
Fluorides	0.06	0.554
Sulfur Acid Mist	0.0768	0.710
Hydrogen Chloride	4.0	37.9

(1) Based on a throughput of 110 percent of design capacity
and the operation of four incinerators

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Table ~~II~~-3
 Maximum Air Quality Impacts Of The RRF
 For Comparison To The De Minimus Ambient Levels

<u>Pollutant</u>	<u>Maximum Modeled Concentration (1)(ug/m³)</u>	<u>De Minimus Ambient Impact Level (ug/m³)</u>
SO ₂ (24-hour)	21.6	13
CO (8-hour)	16.3	575
NO ₂ (Annual)	1.0	14
Lead (24-hour)	0.33 0.32	0.1
Mercury (24-hour)	0.035	0.25
Beryllium (24-hour)	0.000088	0.00050
Fluorides (24-hour)	0.405	0.25
Sulfuric Acid Mist	0.52	-
PM (2)	2.6	10

(1) Highest second-high concentration assuming four incinerators

(2) PM included for informational purposes.

V - 4

Table ~~II~~-4

Hillsborough County 1983 Monitoring Data in the Vicinity of the Proposed
Resource Recovery Facility

Pollutant	Site	Location with Respect to the Proposed Facility		Averaging Time	Concentration Category	Concentration (ug/m ³)
		Direction	Distance (km)			
SO ₂	4360-052	278°	9.9	3-hour	Second-high	493
				24-hour	Second-high	86
				Annual	Highest	16
NO ₂	4360-052	278°	9.9	Annual	Highest	35
CO	4360-052	278°	9.9	1-hour	Second-high	12,600
				8-hour	Second-high	5,700
Lead	1800-082	285°	3.3	Calendar quarter	Highest	0.8
PM(1)	1800-082	285°	3.3	24-hour	Second-high	115
				Annual	Highest	54
O ₃ (1)	4360-035	259°	11.5	1-hour	Second Daily High	281

(1) Nonattainment Pollutants

V-5
Table ~~XI~~-5

Comparison of New Source Impacts
with PSD Increments

Pollutant and Averaging Time	PSD Class II Increment ($\mu\text{g}/\text{m}^3$)	Predicted Increased Concentration ($\mu\text{g}/\text{m}^3$)	Increment Consumed (%)	PSD Class I Increment ($\mu\text{g}/\text{m}^3$)	Predicted Increased Concentration ($\mu\text{g}/\text{m}^3$)
SO ₂					
3-hour	512	359	73	25	<1
24-hour	91	87	96	5	<1
Annual	20	5	25	2	<<1

Revised 12/31/86

Table ^{V-6}
XI-6

Comparison of Total Impacts with
Ambient Air Quality Standards

Pollutant and Averaging Time	Maximum Impact Project	Maximum Impacts All Sources (ug/m ³)	Existing Background (ug/m ³)	Maximum Total Impact (ug/m ³)	^{National} Florida AAQS (ug/m ³)
SO ₂					
3-hour	40	453	493	946	1300
24-hour	22	163	86	249	260 ³⁶⁵
Annual	1	9	16	25	60 ⁸⁰
CO					
1-hour	32	-	12600	12632	40,000
8-hour	16	-	5700	5716	10,000
NO ₂					
Annual	1	-	35	36	100
Lead					
3-months quarterly	0.05 0.33 ¹	-	0.8	0.8 1.1	1.5

¹ The maximum quarterly average was conservatively estimated
by using the maximum 24 hour average

MEMORANDUM

DATE: SEP - 9 1986

SUBJECT: PSD Permit For The Hillsborough County Energy
Recovery Facility

FROM: Jack E. Kavan
Regional Administrator

TO: Thea McManus (PM-223)
Federal Register Officer

Lee A. DeHihns, III
Deputy Regional Administrator

On July 7, 1986, the Regional Administrator for Region IV issued a Prevention of Significant Deterioration construction permit to Hillsborough County. The effective date of this permit was August 11, 1986, and allows for the construction of a 1200 ton per day municipal solid waste incineration facility.

This Federal Register notice announces the issuance of this PSD permit. This is not a "rule" or "rulemaking" under Executive Order 12291 and therefore cannot be "major" under that Executive Order. OMB review is not required, nor is review by Headquarters necessary.

Please have this notice forwarded for publication in the "Notices" section of the Federal Register. Questions may be directed to Michael Brandon at (FTS) 257-4253.

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE PREVENTION
OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 USC §7470 et. seq., and the regulations promulgated thereunder at 40 CFR §52.21, as amended at 45 Fed. Reg. 52676, 52735-41, (August 7, 1980).

Hillsborough County Department of Solid Waste

is, as of the effective date of this permit (PSD-FL-104) authorized to construct a stationary source at the following location:

0.6 miles North of State Route 60
between Faulkenburg Road
and the TECO transmission line corridor
in Hillsborough County, Florida

Upon completion of authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Specific Conditions (Part I) and General Conditions (Part II)

This permit is hereby issued on JUL 2 1986
and shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1).

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and local law.

Date Signed

Regional Administrator

Best Available Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PSD PERMIT FOR THE

HILLSBOROUGH COUNTY ENERGY RECOVERY FACILITY

BRANDON, FLORIDA

AGENCY: Environmental Protection Agency.

ACTION: Notice.

SUMMARY: Notice is hereby given that the Prevention of Significant Deterioration (PSD) permit issued to the Hillsborough County Department of Solid Waste on July 7, 1986, became effective on August 11, 1986. The permit was issued for the construction of a 1200 ton per day municipal solid waste incineration facility with electrical generation capability.

DATE: This action is effective as of August 11, 1986, the effective date of the PSD permit. Construction must begin within eighteen (18) months of this date or the permit will become invalid.

ADDRESSES: Copies of the PSD permit, permit application, preliminary and final determinations are available for public inspection upon request at the following locations:

U.S. Environmental Protection Agency
Air Programs Branch
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

FOR FURTHER INFORMATION CONTACT: Wayne Aronson of the EPA Region IV, Air Programs Branch at the Atlanta address given above, telephone (404) 347-4901; (FTS) 257-4901.

SUPPLEMENTAL INFORMATION: On December 13, 1985, the Hillsborough County Department of Solid Waste submitted an application to construct three 400 ton per day municipal solid waste incinerators near Brandon, Florida. The preliminary determination was issued by the Florida Department of Environmental Regulation (DER) on March 25, 1986, and the public comment period commenced on April 7, 1986. The Final Determination was issued by the Florida DER on May 30, 1986. Comments on the determinations were made by both EPA and the Hillsborough County Department of Solid Waste in reference to various permit conditions. No other comments were received during the public comment period.

The federal PSD permit was issued on July 7, 1986, and became effective on August 11, 1986. The effective date of this permit constitutes final Agency action under 40 CFR §124.19(f)(1) and Section 307 of the Clean Air Act, for purposes of judicial review. Under Section 307(b)(1) of the Act, petitions for judicial review of this action must be filed in the United States Court of Appeals for the appropriate circuit by [60 days from today]. This action

may not be challenged later in proceedings to enforce its requirements (see §307(b)(2)). If construction does not commence within eighteen (18) months after the effective date, that is, by February 11, 1988, or if construction is not completed within a reasonable time, the permit shall expire and the authorization to construct shall become invalid.

(Sections 160-169 of the Clean Air Act (42 U.S.C. 7470-7479).)

DATE: SEP - 9 1986

Lee A. DeHihns, III, Deputy

Lee A. DeHihns, III, Deputy
REGIONAL ADMINISTRATOR

PART I

Specific Conditions

1. Emission Limitations

a. Stack emissions from each unit shall not exceed the following:

- (1) Particulate matter: 0.021 grains per dry standard cubic foot corrected to 12% CO₂ (gr/dscf-12%) or 7.0 pounds per hour per unit, whichever is more restrictive.
- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity except that 20% opacity may be allowed for one six-minute period (average of 24 consecutive observations recorded at 15-second intervals) in any one hour. Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by EPA for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited. Opacity of other emission points at the plant shall not exceed 5%.

- (3) VOC: 0.01 gr/dscf-12%, or 0.2 lb/ton, whichever is more restrictive
- (4) SO₂: 0.17 gr/dscf-12% or 3.2 lb/ton, whichever is more restrictive, 24-hour average, 0.45 gr/dscf-12% or 8.5 lb/ton, whichever is more restrictive, 3-hour average
- (5) Nitrogen Oxides: 0.16 gr/dscf-12%, or 3.0 lb/ton, whichever is more restrictive
- (6) Carbon Monoxide: 0.093 gr/dscf-12%, or 1.8 lb/ton, whichever is more restrictive.

- (7) Lead: 0.00104 gr/dscf-12%, or 0.020 lb/ton, whichever is more restrictive.
- (8) Fluorides: 0.0031 gr/dscf-12%, or 0.060 lb/ton, whichever is more restrictive.
- (9) Sulfuric Acid Mist: 0.0040 gr/dscf-12%, or 0.077 lb/ton, whichever is more restrictive.
- (10) Beryllium: 6.8×10^{-7} gr/dscf-12%, or 1.3×10^{-5} lb/ton, whichever is more restrictive.
- (11) Each of the emission limits in conditions (1) and (3) through (10) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (3) through (10) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.
- (12) Mercury: 2200 grams/day
- (13) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. Additionally, all portions of the proposed facility including the ash handling facility which have the potential for fugitive emissions will be enclosed. Also those areas which have to be open for operational purposes, e.g., tipping floor of the refuse bunker while trucks are entering and leaving, will be under negative air pressure.
- (14) Each of the three units is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards

(NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.

- (15) Only natural gas will be used as an auxillary fuel.

b. Compliance Tests

- (1) Compliance tests for particulate matter, SO₂, nitrogen oxides, CO, VOC, sulfuric acid mist, fluorides, mercury and beryllium shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f), except that an annual test will be conducted for particulate matter. Compliance tests for opacity will be conducted simultaneously during each compliance test run for particulate matter.

Compliance tests shall be conducted for such time and under such conditions as specified by EPA prior to the compliance test. These conditions will be specified by EPA upon notification of performance tests as required by General Condition 1. The permittee shall make available to EPA such records as may be necessary to determine the conditions of the performance tests.

- (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:

- a. Method 1 for selection of sample site and sample traverses
- b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
- c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
- d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.

- e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
- f. Method 9 for visible determination of the opacity of emissions.
- g. Method 6 for concentration of SO₂. Two samples, taken at approximately 30 minute intervals, shall constitute one test run.
- h. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.
- i. Method 8 for determination of sulfuric acid mist concentration and associated moisture content. One sample shall constitute one test run.
- j. Method 10 (continuous) for determination of CO concentrations. One sample constitutes one test run.
- k. Method 12 for determination of lead concentration and associated moisture content. One sample constitutes one test run.
- l. Method 25 for determination of volatile organic compounds (VOC) concentration. One sample shall constitute one test run.
- m. Method 13A or 13B for determination of fluoride concentrations and associated moisture content. One sample shall constitute one test run.
- n. Method 101A for determination of mercury emission rate and associated moisture content. One sample shall constitute one test run.
- o. Method 104 for determination of beryllium emission rate and associated moisture content. One sample shall constitute one test run.

(3) The stack tests shall be performed at +10% of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.

2. The height of the boiler exhaust stack shall be 220 feet above ground level at the base of the stack.
3. The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each. 18.3 tons/hr
110%
4. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.
5. The permittee must submit to EPA and DER within fifteen (15) days after it becomes available to the County, copies of technical data pertaining to the incinerator boiler design, to the electrostatic precipitator design, and to the fuel mix that can be used to evaluate compliance of the facility with the preceeding emission limitations.
6. Grease, scum, grit screenings or sewage sludge shall not be charged into the solid waste to energy facility boilers.

7. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to limit particulate emissions to no more than 0.021 grains per dscf corrected to 12% CO₂.

8. Stack Monitoring Program

The permittee shall install and operate continuous monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Rule 17-2.710, FAC, 40 CFR Part 60, Subparts A and D, Sections 60.13 and 60.45 respectively, except that emission rates shall be calculated in units consistent with emission limits in this permit. The conversion procedure shall be approved by EPA.

9. Reporting

- a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office, the Hillsborough County Environmental Protection Commission (HCEPC) and EPA Region IV.
- b. Stack monitoring shall be reported to HCEPC, the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

10. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.

11. Addresses for submitting reports are:

a. EPA - Region IV

Chief, Air Compliance Branch
U.S. Environmental Protection Agency
345 Courtland St.
Atlanta, GA 30365

b. DER

Chief, Compliance and Ambient Monitoring
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

c. Southwest District Office of DER

District Manager
Department of Environmental Regulation
7601 Highway 301 N.
Tampa, FL 33610

d. HCEPC

Chief, Air Group
Hillsborough County Environmental
Protection Commission
1900 9th Ave.
Tampa, FL 33605

12. The facility shall provide space for the future installation, if necessary, of a wet or dry flue gas scrubber.

PART 11

General Conditions

1. The permittee shall comply with the notification and record-keeping requirements codified at 40 CFR Part 60, Subpart A, § 60.7.
2. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
3. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide EPA with the following information in writing within five (5) days of such conditions:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission, and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of the aforementioned information does not constitute a waiver of the emission limitations contained within this permit.

4. Any proposed change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that would result in new or increased emissions or ambient air quality impact must be reported to EPA. If appropriate, modifications to the permit may then be made by EPA to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein. Any construction or operation of the source in material variance with the application shall be considered a violation of this permit.

5. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit and EPA of the change in control of ownership within 30 days.
6. The permittee shall allow representatives of the state and local environmental control agency or representatives of the EPA upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Clean Air Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emissions of pollutants; and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
7. The conditions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby..

RECEIVED

AUG 1 1994

7-29-94

Teresa,

Bureau of
Air Regulation

Here is a copy of the PSD permit for
Hillsborough RRF (PSD-FL-104). We do not
have the actual signed cover page. I also
sent a copy of the signed Federal Register notice.

Scott Davis

RECEIVED

AUG 4 1994

E.P.C. OF H.C.
AIR PROGRAM

EXHIBIT A

DRAFT PSD PERMIT MODIFICATION
FOR HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY
(PSD-FL-104)

Page 1, Paragraph 3

This modification to Permit No. PSD-FL-104 addresses the increased emissions of nitrogen oxides and sulfuric acid mist from the stack at the resource recovery facility. It also addresses the particulate emissions from the ash residue facility and dust suppression baghouse. Except as expressly provided in the specific conditions contained herein, all of the other provisions of Permit No. PSD-FL-104 remain in effect.

Specific Conditions


1. Specific Condition 1.a.(5) in Permit No. PSD-FL-104 establishes an emission limitation for nitrogen oxides. It is modified to read as follows:

 (5) Nitrogen Oxides: 0.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive.
2. Specific Conditions 1.a.(9) and 1.b.(2)i concerning sulfuric acid mist emission limitations and compliance test requirements are deleted.
3. Pursuant to Rule 17-2.700(3)d, FAC, a standard of 5% opacity is hereby set for the minor particulate source control equipment/baghouse (i.e., the ash residue building dust suppression system). The compliance test requirements for the ash handling facility will be waived in accordance with Rule 17-2.700(3)d, FAC.

DSD/vc:Hills-RR2

Copied: CHF/BT

Barry Andrews

8/12/87 

CARLTON, FIELDS, WARD, LEMMANUEL, SMITH, CUTLER & KENT, P.A.

P.O. DRAWER 190

TALLAHASSEE, FLORIDA 32302



CLAIR H. FANCY
DEPUTY CHIEF
BUREAU OF AIR QUALITY MANAGEMENT
DEPARTMENT OF ENVIRONMENTAL REGULATION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400





PM
6-9-87
Atlanta, Ga

File 6007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUN - 8 1987

4APT/APB-ljf

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
JUN 11 1987
BAQM

Re: Permit Modification Request for Hillsborough County RRF (PSD-FL-104)

Dear Mr. Fancy:

This is in reference to your May 5, 1987, letter transmitting a copy of Ogden Martin Systems of Hillsborough, Incorporated's May 1, 1987, request for a modification to the above-referenced permit. Their request is to raise the emission limits for nitrogen oxides and sulfuric acid mist based on recent stack test results. Your May 5, 1987, letter solicited our comments on Ogden Martin's proposed PSD permit modification.

We concur that the permit be modified in accordance with their request and justification for nitrogen oxides. However, we believe the results of their tests for sulfite concentration as an indication of sulfuric acid mist by EPA reference method 8 is biased high due to concentrations of fluoride and ammonia in the flue gases. As no acceptable test method exists for measuring sulfuric acid mist emissions from municipal solid waste incinerators, and these emissions are estimated based on sulfur dioxide concentrations, we propose that no emissions limits for sulfuric acid mist be included in the revised permit. In this case, we do not feel that such an emissions limit is appropriate since compliance with such a limit could not be determined.

If you have comments or questions regarding this letter, please contact Mike Brandon of my staff at (404) 347-2864.

Sincerely,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

copied:

Barry

Tom

Pradeep

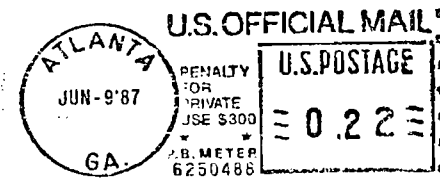
6-11-87 RRL

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

AIR-4

Mr. Clair H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32301



6-11-87

~~CLH~~
1

F Y I. Return
for filing.

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Bm

File 1987

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

May 5, 1987

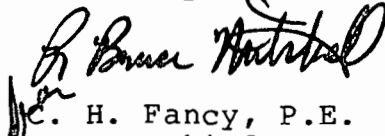
Mr. Wayne Aronson
Chief
Program Support Section
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: PSD Permit Modification Request
Hillsborough County RRF: PSD-FL-104

Enclosed for your review are comments from Mr. Richard W. Seelinger on behalf of the applicant of the above referenced project. Please forward any comments to me at the above address or call Barry Andrews or Pradeep Raval at (904)488-1344.

Sincerely,


H. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

/bm

enclosure

OGDEN PROJECTS, INC.

Telecopier No. 201-882-8207
201-882-8239



AN OGDEN COMPANY

TO: Hamilton S. Owen
DER
Tallahassee Fl
1-904-487-4938

TELECOPIER NO: ~~1-904-788-1180~~

FROM: J. R. Treshler

DATE: 5-1-87

TIME: 4:40 PM

NUMBER OF PAGES TO FOLLOW: 14

PROJECT NAME: Hillsborough

PROJECT NUMBER: C-1004

Air Quality Impact of Requested Emissions Levels

	NO _x	
	Existing Permit Levels	Requested Permit Levels
gr/dscf @ 12% CO ₂	0.16	0.34
Annual Impact (µg/M ³)*	1.0	2.1
% of FAAQS	1.0	2.1
Monitored Background	35	35
Total (µg/M ³)	36	37
% of FAAQS	36	37

	H ₂ SO ₄	
	Existing Permit Levels	Requested Permit Levels
gr/dscf @ 12% CO ₂	0.004	0.072
H ₂ SO ₄ 8-hr (µg/M ³)*	0.95	17.1
Annual (µg/M ³)*	0.027	0.49
TLV (8 hr)-(µg/M ³)**	1,000	1,000
AAL (Annual)-(µg/M ³)**	3.3	3.3
% of TLV	0.095	1.7
% of AAL	0.82	14.8

* Derived from modelling results contained in the Air Quality Impact Analysis in the PSD Application.

** Threshold Limit Value, American Conference of Governmental Industrial Hygienists.

*** Allowable Ambient Limit, New York State Department of Environmental Conservation.

Figure 8.2 gives an expanded scale of Fig. 8.1 in the low excess air region. While these two curves are necessary to describe the entire region covered, it was found that a limited area could be approximated by the following formulae:

$$\frac{\text{mols SO}_3}{\text{mol O}_2} = (\% \text{ Sulfur})(0.001635) \left[\frac{(\% \text{ Excess Air})^{0.433}}{\left(\frac{^\circ\text{F Temp}}{1000} \right)^{6.9}} \right]$$

or

$$\frac{\text{lbs SO}_3}{10^6 \text{ Btu}} = (\% \text{ Sulfur})(0.001635) \left[\frac{(\% \text{ Excess Air})^{0.433}}{\left(\frac{^\circ\text{F Temp}}{1000} \right)^{6.9}} \right]$$

Where the excess air is from 5 to 25 percent and the temperature from 1500 to 2500° F, a maximum error of 12 percent will occur.

Example:

For the same case of 2.8 percent sulfur, 25 percent excess air and 2000° F, find the mols of SO₃ per mol of stoichiometric O₂ by the formula given.

$$\frac{\text{mols SO}_3}{\text{mol O}_2} = (2.8)(0.001635) \left[\frac{(25)^{0.433}}{\left(\frac{2000}{1000} \right)^{6.9}} \right] = 0.0001545$$

Since a value of 0.00014 was found from the curves, the error is 9.37 percent.

The effect of introducing alkaline metals into the sulfur reaction was not studied in depth. It can be stated that there is a definite tendency to form the sulfate form of sodium when both sulfur and sodium are present at 1800° F. The results presented here are for reactions without alkaline metals present.

Other metals such as vanadium may also act as catalysts in the SO₂ to SO₃ reaction and continue the reaction beyond the combustion zone.

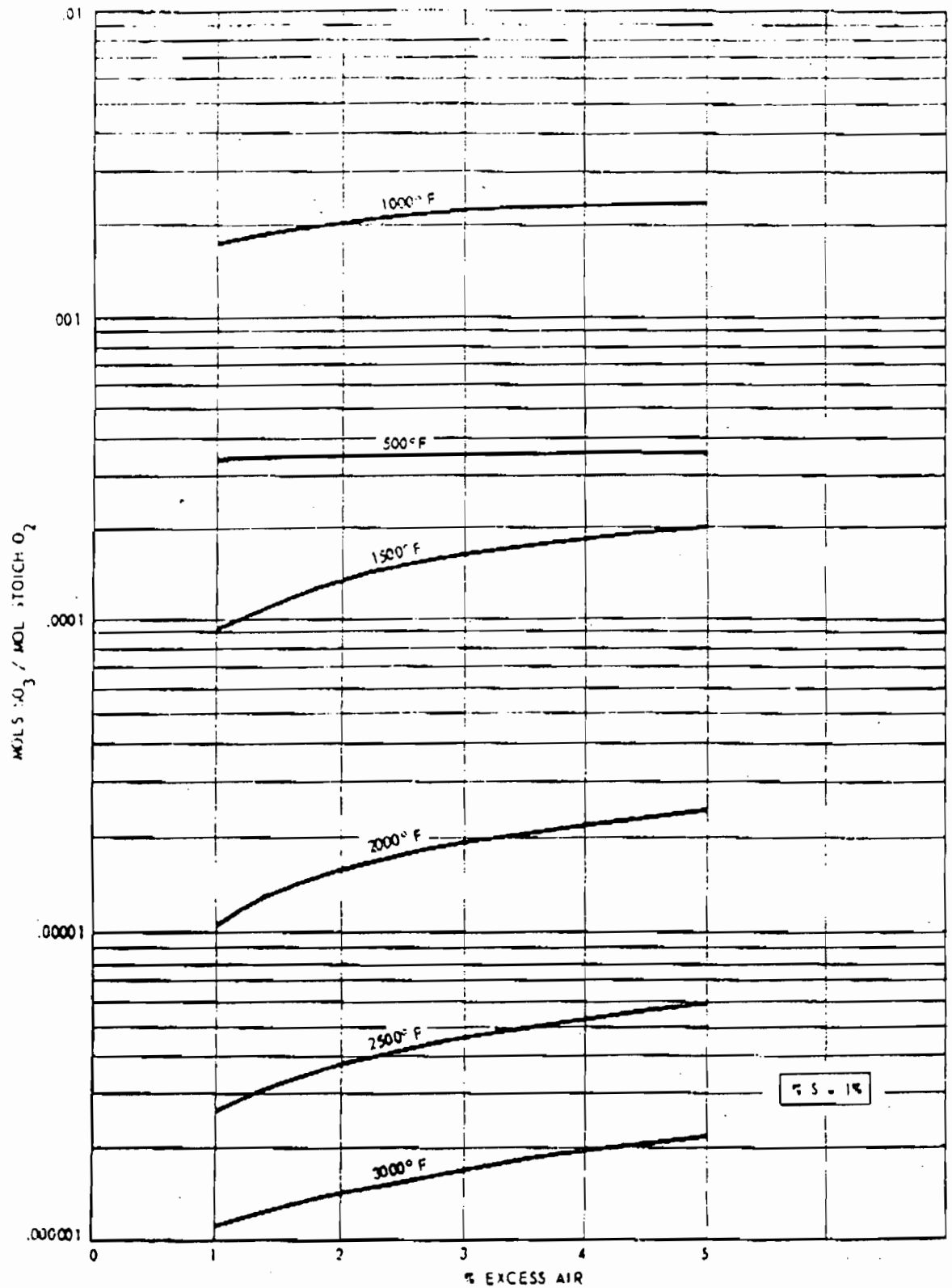


FIG 3.2

OGDEN PROJECTS, INC.

Telecopier No. 201-882-8707
201-882-8729



TO:

Hamilton S. OwenDERTallahassee. FL1-904-487-4938

TELECOPIER NO:

~~1-904-487-4938~~

FROM:

J. R. Treshler

DATE:

5-1-87

TIME:

4:07 PM

NUMBER OF PAGES TO FOLLOW:

14

PROJECT NAME:

Hillsborough

PROJECT NUMBER:

C-1005

*Balance of 14
sheets*

COUNTY



OF HILLSBOROUGH

P.O. BOX 1110 TAMPA, FLORIDA 33601

Department of Solid Waste
(813) 272-6674

OFFICE OF THE COUNTY ADMINISTRATOR

July 29, 1986

RECEIVED

AUG 1 1986

OGDEN MARTIN SYSTEMS
OF HILLSBOROUGH, INC.

Mr. J. Thomas Sweeney
Ogden Martin System
of Hillsborough, Inc.
140 Ridgewood Avenue
Paramus, NJ 07652

Dear Tom:

Attached is the PSD permit issued by the U. S. Environmental Protection Agency on July 2, 1986. The permit becomes effective thirty (30) days after receipt, which was July 14, 1986.

Sincerely,

Thomas G. Smith
General Manager
Department of Solid Waste

New File
C-1005 *PSD Permit*
H.C. SWEEP

TGS:elj

PLEASE FILE

Attachment

F.M. PALERMO
X TOM SWEENEY
X TOM HALL
BOB HARNETT
BILL HILL
X ROY SIMPSON
X J.R. TRESHLER
A. RITTNER
G. MILLS
P. RUPPEL
D.L. SOKOL
J.E. SALMON
P. WASIOWICH
T. NICOLAU
A. HILDABIDLE
X G. CRANE

OGDEN MARTIN SYSTEMS
OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD NEW JERSEY 07007-2615
(201) 882-9000

Received DER

MAY 1 1987

B.P.S



May 1, 1987

DER

MAY 05 1987

BAQM

Mr. Hamilton S. Oven, Jr., P.E.
State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Modification of Power Plant Site
Certification No. PA 83-19 and Prevention of
Significant Deterioration Permit No. PSD-FL-104
as amended July 2, 1986

Dear Mr. Oven:

On behalf of Ogden Martin Systems of Hillsborough County, Inc. (OMSH), I would like to thank you and your staff for meeting with representatives of Ogden Martin Systems, Inc. (Ogden) on April 10, 1987 at the Department of Environmental Regulation Offices in Tallahassee, Florida to discuss proposed modifications of the referenced permits. Based upon test data which has become available to the municipal solid waste combustion industry subsequent to the issuance of the aforesaid permits, it has become apparent that the Hillsborough County Resource Recovery Facility (Facility) will be unable to meet the permitted levels for nitrogen oxides (NO_x) and sulfuric acid mist (H₂SO₄ mist) for reasons that will be set forth below. Accordingly, please consider this a formal request by OMSH, on behalf of Hillsborough County, for a modification of the permits in the following respects:

A. Adjust the permissible emission level of NO_x in the Power Plant Site Certification and the Prevention of Significant Deterioration Permit to 0.34 gr/dscf at 12 percent CO₂ for a three (3) hour average from 0.16 gr/dscf at 12 percent CO₂, the current permit level.

B. Adjust the permissible emission level of H₂SO₄ mist in the Prevention of Significant Deterioration Permit to 0.072 gr/dscf at 12 percent CO₂ for a three (3) hour average from 0.004 gr/dscf at 12 percent CO₂, the current permit level. The twenty-four (24) hour average H₂SO₄ mist emission level would be 0.027 gr/dscf at 12 percent CO₂.

A chart captioned Requested Permit Change for Hillsborough is attached hereto as Exhibit "A".

Mr. Owen
Page -2-
May 1, 1987

Based upon Ogden's experience with emissions from other refuse burning facilities which have recently gone into service, it appeared the Facility would not be able to comply with the permitted levels for NOx and sulfuric acid mist. This awareness generated our conference in Tallahassee. Recent testing at the Facility has confirmed our belief. The actual emission levels for NOx and H₂SO₄ mist exceed the permit levels. The requested adjustments are being sought to more realistically reflect emission levels in modern refuse burning facilities and to reflect permissible levels of these substances which have been approved by state regulatory agencies and/or the Environmental Protection Agency (EPA) in other regions. The increases being sought are minimal and will not cause or contribute to the facility exceeding acceptable ambient air quality standards. The specific reasons for the requested changes and the supporting data are outlined below.

NITROGEN OXIDES

The emission level for NOx originally adopted in the issued PSD permit was the same level that was requested in the application submitted in August, 1984. At the time of the submission of the application, there were no data available to Ogden or other similar corporations with regard to NOx emission levels being experienced by modern refuse burning facilities using state of the art mass-burn technology. As a consequence, data derived from older facilities then in operation were used as the source of the NOx emission level requested in the application. The older facilities were neither designed nor operated to achieve the high degree of combustion efficiency as that achieved by this facility and, perhaps predictably, testing has demonstrated that the older data are not compatible with emissions from modern facilities. Subsequent to submission of the present application, several resource recovery facilities around the country using improvements in combustion technology have gone into service. Two of these are Ogden facilities in Tulsa, Oklahoma and Marion County, Oregon. Operation of these facilities has shown that actual NOx levels are equivalent to those being sought herein.

As you are aware, NOx in combustion exhaust is the result of two chemical processes, namely, the conversion of nitrogen contained in the fuel and the oxidation of atmospheric N₂, or thermal NOx. Levels of NOx in modern energy recovery facilities are necessarily increased as a result of higher

Mr. Owen
Page -3-
May 1, 1987

operating temperatures. However, this increase is not without a concomitant reduction of harmful pollutants such as carbon monoxide and volatile organic compounds. For example, our preliminary tests indicate that the Facility is producing less than 15 percent of the permitted emission level of carbon monoxide and is performing in a similar manner to the Tulsa facility where volatile organic compounds have been lowered to the point where they are at "trace" levels at the lower level of detection using current EPA monitoring procedures. These harmful pollutants are greatly reduced by the controlled combustion temperatures produced by this facility. Therefore, there is a beneficial tradeoff of substantial reductions in harmful emissions for a small increase of nitrogen oxide emissions. It is for this reason that an adjustment of the emission level of NOx is being requested. Noteworthy is that a similar request for an upward adjustment for NOx was made by Ogden and accepted by the Tulsa City County Health Department and has been preliminarily accepted by the state of Oklahoma and the U.S. EPA for the Ogden facility in Tulsa, Oklahoma. For reference these permits bear numbers T84-23 and PSD-OK-556 M-2. The latter adjustments recognized the necessity of increasing the NOx emission level to be compatible with current technology.

A chart captioned Emission Test Data and Permit Levels for NOx and H₂SO₄ is attached hereto as Exhibit "B" which summarizes the data which have been assimilated by Ogden regarding NOx emissions. This chart shows emission levels of NOx from Ogden facilities and other similar plants for which NOx data are available.

SULFURIC ACID MIST

OMSH also seeks an adjustment of the emission level for sulfuric acid mist to reflect emissions of this substance from modern refuse burning facilities. The emission level for H₂SO₄ mist that was originally requested in the application, and later adopted in the permit, was not based upon operating results of facilities using current technology. At the time the application was submitted, no such data were available. In fact, it has only been very recently that H₂SO₄ mist emissions have been regulated in refuse burning facilities. The basis for the emission level contained in the application was a "theoretical" calculation derived from a formula found in an ASME text published in 1974 involving a different type of

Mr. Owen
Page -4-
May 1, 1987

facility. A copy of this article is attached hereto as Exhibit "C". The findings in this reference source were based upon the burning of fuel oil at 25 percent excess air rather than combustion of municipal refuse at 90 to 100 percent excess air.

Based upon the experience of resource recovery facilities recently coming into service, the sulfuric acid mist levels originally requested and adopted are unrealistically low and require adjustment. It is important to note that even at the modified level requested, the amount of sulfuric acid mist emitted is still at trace levels and exceedingly difficult to accurately measure. Measurements which are able to be obtained show emission levels well within acceptable ambient air quality parameters.

One observation that should be made in connection with the present permitted level of H_2SO_4 mist is that no emission limit was listed for this pollutant in the original permit. When the permit was revised in July, 1986 regarding SO_2 , the permissible level of SO_2 was adjusted upward in order to reflect current experience for short terms emissions, in addition a limit was assigned for H_2SO_4 mist which reflected a conversion rate of 2% based on the original permits SO_2 level. Since any increase in the allowable level of SO_2 will result in a proportionate increase in the amount of H_2SO_4 , it was apparently an oversight that the H_2SO_4 emission level was established based on the lower original permit's SO_2 emission level and not on the revised increased SO_2 emission level approved as part of the July 1986 permit revision. Based upon Ogden's current experience with its resource recovery facility in Tulsa in which SO_2 is converted into H_2SO_4 at the rate of 15 to 18 percent by weight, the new emission level now being requested by OMSH would be consistent with the currently permitted SO_2 levels.

Data summarizing relevant information concerning sulfuric acid mist levels are attached in Exhibit "B". In addition, the air quality impact of the requested emission levels of NO_x and H_2SO_4 are shown as a comparison to the existing permit levels in the table captioned "Air Quality Impact of Requested Emissions Levels" attached hereto as Exhibit "D". The NO_x annual impact will be increased from 36 percent to 37 percent of the Florida Ambient Air Quality Standards. The H_2SO_4 eight (8) hour TLV and annual AAL (NYSDEC Air Guide 1) impact will be increased from .095 percent to 1.7 percent and from .82 percent

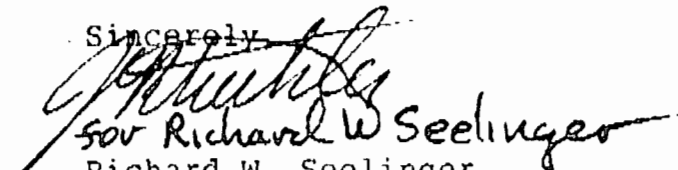
Mr. Owen
Page -5-
May 1, 1987

to 14.8 percent, respectively. These results are based on the modeling in the original application for a 1600 TPD facility operating at 110 percent with 100 percent availability. The present facility is 1200 TPD, thus the results presented should be conservative.

The Hillsborough County Resource Recovery facility is eligible to be dedicated and placed into service in the very near future and therefore all parties concerned are most anxious to expeditiously modify the captioned permits so that there will be as little delay as possible in placing the plant in service. We feel our meeting in Tallahassee was most beneficial and are formalizing our verbal request made at that time by way of this correspondence. We would respectfully request that the Department of Environmental Regulation take the lead in making the modifications in view of the fact that the EPA has delegated PSD permitting authority to the DER and the DER has had technical experience with this project since its inception. If any additional information is needed, we would be most willing to promptly supply the same. We would also be willing to meet again with your staff or with representatives of the EPA if that would expedite the understanding and handling of the present request.

Thanking you for your continued cooperation in this matter, we remain

Sincerely,


Richard W. Seelinger
Executive Vice President

RWS/ecd
Enclosures

REQUESTED PERMIT CHANGE FOR HILLSBOROUGH

Pollutant	Existing Permit Levels (1)(2)		Requested Permit Levels	
	gr/dscf @ 12% CO ₂	ppm @ 12% CO ₂	gr/dscf @ 12% CO ₂	ppm @ 12% CO ₂
NO _x (3 hour average)	0.16	191	0.34	404
SO ₂ (3 hour average)	0.45	388	No requested changes	
SO ₂ (24 hour average)	0.17	146	No requested changes	
H ₂ SO ₄ (3 hour average)	0.004	2.2	0.072*	39*
H ₂ SO ₄ (24 hour average)**	NA	NA	0.027*	15*
%H ₂ SO ₄ /SO ₂ (3 hour average)**	0.9	0.6	16	10
%H ₂ SO ₄ /SO ₂ (24 hour average)**	NA	NA	16	10

References:

- (1) U.S. EPA Permit PSD-FL-104
- (2) Power Plant Siting Certificate PA 83-19

* The requested permit levels of H₂SO₄ are a function of the existing permit levels of SO₂ which are specified in the permit at 3 hour and 24 hour averages.

** These are not existing nor requested permit levels. This information is being given for comparison purposes only.

Notes: 1) NA is Not Applicable.

2) The %H₂SO₄/SO₂ under gr/dscf at 12% CO₂ is by weight and under ppm @ 12% CO₂ is by volume.

EMISSION TEST DATA AND PERMIT LEVELS FOR NO_x AND H₂SO₄.

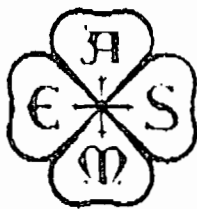
<u>Pollutant</u>	<u>Tulsa</u>		<u>Marion</u>	<u>Wurzburg</u>	<u>Stockholm</u>	<u>Preliminary⁽⁵⁾ Hillsborough Test Results</u>
	<u>Test ppa @ 12% CO₂</u>	<u>Permit ppa @ 12% CO₂</u>	<u>test ppa @ 12% CO₂</u>	<u>Test ppa @ 12% CO₂</u>	<u>Test ppa @ 12% CO₂</u>	<u>ppa @ 12% CO₂</u>
NO _x	385 ⁽¹⁾	404	357 ⁽²⁾	318 ⁽³⁾	311 ⁽⁴⁾	327
SO ₂	85.4 ⁽⁶⁾	137.8	-----DATA NOT AVAILABLE-----			
H ₂ SO ₄	12.4 ⁽⁶⁾	21.1	-----DATA NOT AVAILABLE-----			
XH ₂ SO ₄ /SO ₂	14.5	15.3	-----DATA NOT AVAILABLE-----			
						15.2

References:

- (1) Ogden Projects, Inc. Data, 3-hr rolling average, worse case.
- (2) Ogden Projects, Inc. Data, 3-hr rolling average, worse case.
- (3) Cooper Engineer's Report "Air Emission Testing at the Wurzburg, West Germany Waste-to-Energy Facility", June 1986, 3-hr average.
- (4) Ogden Projects, Inc. Report #124, averaging period unknown.
- (5) Preliminary data obtained during testing at the Hillsborough Facility, 3-hr average.
- (6) Ogden Projects, Inc. Report Number 101.

EXHIBIT B

Combustion Fundamentals for Waste Incineration



SPONSORED BY THE
ASME RESEARCH
COMMITTEE ON
INDUSTRIAL AND
MUNICIPAL WASTES

THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS
United Engineering Center 345 East 47th Street New York, N. Y. 10017

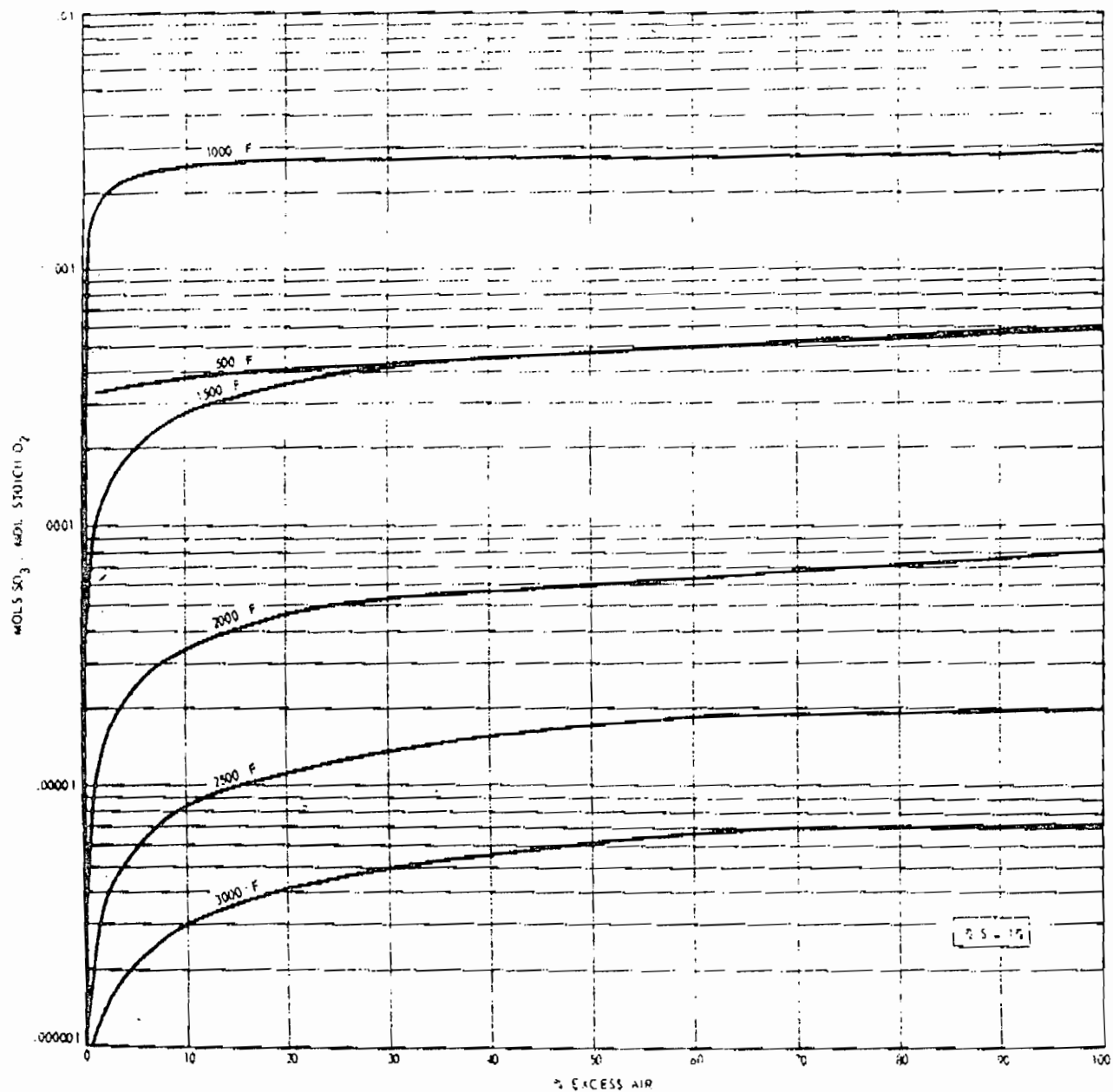


FIG. B.1

ATTACHMENT "C" P. 4

EDITOR'S NOTE: Numbers in parentheses indicate equations. References are noted by numbers in brackets and appear at the end of their respective Chapter or Table. Numbered Source references (also in brackets) for Appendices G and H appear *only* within the text, since they primarily comprise text material.

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United Engineering Center
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ATTACHMENT "C" P. 2

Chapter 8 — Sulfur Oxides

When sulfur is present in a hydrocarbon fuel, it will form oxides under equilibrium combustion conditions. These can be either sulfur dioxide (SO_2) or sulfur trioxide (SO_3). The amount that goes to SO_3 in relation to SO_2 will always be small, but it is often important. The SO_3 form readily combines with water vapor to form a high dew point sulfuric acid that can be both visible and corrosive. Equilibrium calculations for sulfur containing hydrocarbon fuels were made in the following limits:

Sulfur Content: 0.67 to 5.47%
Excess Air: 0 to 100%
Temperature: 500 to 3000°F

The results are plotted on Fig. 8.1. Values of SO_3 expressed as mols per mol of stoichiometric oxygen are plotted vs. excess air in percent with values given along lines of constant temperature. The curve is drawn for 1 percent sulfur fuel content by weight. Values for other percent sulfur contents can be obtained by multiplying the curve by the ratio of the actual sulfur content to one.

Example:

A 2.8 percent sulfur fuel is burned at 2000°F with 25 percent excess air. Determine the ppm of SO_2 and SO_3 if the hydrocarbon part of the fuel is represented by C_4H_8 .

From Fig. 8.1, a value of 0.00005 mols SO_3 per stoichiometric mol of O_2 is found at 2000°F and 25 percent excess air. This is for a 1 percent sulfur fuel.

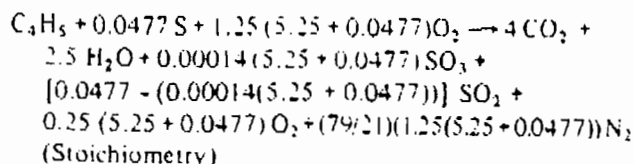
For a 2.8 percent sulfur fuel, the amount of SO_3 produced would be:

$$(2.8)(0.00005) = 0.00014 \text{ mols } \text{SO}_3 \text{ per mol stoic. } \text{O}_2$$

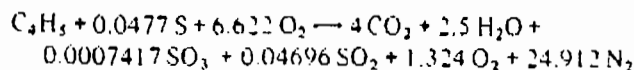
To convert to ppm:

$$\begin{aligned} 1 \text{ mol } \text{C}_4\text{H}_8 &= 53 \text{ lbs} \\ 1-0.28 &= 0.972 \text{ lbs } \text{C}_4\text{H}_8 \text{ per } 0.028 \text{ lbs S} \\ (0.028/32) &= 0.000875 \text{ mols S/0.972 lbs } \text{C}_4\text{H}_8 \\ \left(\frac{0.000875}{0.972}\right)(53) &= 0.0477 \text{ mols S/mol } \text{C}_4\text{H}_8 \end{aligned}$$

So:



or:



On a dry basis, the ppm of SO_3 is:

$$\begin{aligned} \text{ppm } \text{SO}_3 &= \frac{0.0007417}{4 + 0.0007417 + 0.04696 + 1.324 + 24.912} \times 10^6 \\ &= \frac{0.0007417(10^6)}{30.2837} = 24.5 \end{aligned}$$

$$\text{ppm } \text{SO}_2 = \frac{0.04696(10^6)}{30.2837} = 1550.7$$

$$\text{ppm } \text{SO}_x = 24.5 + 1550.7 = 1575$$

Similar calculations can be made for any fuel whose molecular form or ultimate analysis is known. Note that for this particular case, 1% percent of the sulfur was converted to SO_3 .

The relationship of mols to pounds per million Btu can also be calculated or approximated.

Example:

Express the results of the previous example as lbs/10⁶ Btu. Since neither a heat of formation nor heating value is available for C_4H_8 , assume 1 mol of stoichiometric O_2 is equal to a fuel heating value of 184,000 Btu.

$$\begin{aligned} \text{lbs } \text{SO}_3 / 10^6 \text{ Btu} &= \frac{0.00014 \text{ mols } \text{SO}_3}{\text{mol } \text{O}_2} \times \frac{\text{mol } \text{O}_2}{184,000 \text{ Btu}} \times 10^6 \times \frac{80 \text{ lbs}}{\text{mol } \text{SO}_3} \\ &= 0.06 \end{aligned}$$

$$\frac{\text{lbs } \text{SO}_2}{10^6 \text{ Btu}} = \frac{1550.7 \text{ ppm } \text{SO}_2}{24.5 \text{ ppm } \text{SO}_3} \times \frac{64 \text{ lbs } \text{SO}_2}{80 \text{ lbs } \text{SO}_3} \times 0.06 = 3.014$$

JUL 7 1986
4APT-AP/ch

DER

AUG 22 1986

BAQM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Mary Cummings, Director
Department of Solid Waste
Post Office Box 1110
925 East Twiggs Street
Tampa, Florida 33601

RE: PSD-FL-104

Dear Mrs. Cummings:

Review of your December 13, 1985, application to construct a 1200 tons per day (tpy) Energy Recovery Facility in Hillsborough County, Florida, has been completed. The construction is subject to rules for the Prevention of Significant Deterioration (PSD) of air quality contained in 40 CFR §52.21. The Florida Department of Environmental Regulation (FDER) performed the preliminary determination concerning the proposed construction and published a request for public comment on April 6, 1986. On May 21, 1986, FDER prepared a final determination recommending issuance of the PSD permit by EPA. The final determination contains responses to issues raised during the public comment period.

The Environmental Protection Agency (EPA) has determined that the construction as described in the application meets all the applicable requirements of 40 CFR §52.21. Accordingly, pursuant to 40 CFR 124.15, the Regional Administrator has made a final decision to issue the enclosed Permit to Construct - Part I Specific Conditions and Part II General Conditions. This authority to construct, granted as of the effective date of the permit, is based solely on the requirements of 40 CFR §52.21, air quality. It does not apply to other permits issued by this Agency or by other agencies. Please be advised that a violation of any permit condition, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

This final permit decision is subject to appeal under 40 CFR 124.19 by petitioning the Administrator of the EPA within thirty (30) days after receipt thereof. The petitioner must submit a statement of reasons for the appeal and the Administrator must decide on the petition within a reasonable time period. If the petition is denied, the permit shall become effective upon notice of such action to the parties to the appeal. If no appeal is filed with the Administrator, the permit shall become effective thirty (30) days after receipt of this letter. Upon the expiration of the thirty (30) day period, EPA will notify you of the status of the permit's effective date.

Receipt of this letter does not constitute authority to construct. Approval to construct this facility shall be granted as of the effective date of the permit. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Mr. Bruce P. Miller, Acting Chief, Air Programs Branch at 404/347-2864.

Sincerely yours,

Winston A. Smith, Director
Air, Pesticides, & Toxics
Management Division

Enclosure

cc: Mr. Steve Smallwood, P. E., Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation

PFAFF:chaynes:x4253:6/10/86 GEN #4 DISK PFAFF ARONSON MILLER
FINAL DONE 6/13/86

RED WA SPN
6/16 6/17 6/17/86

WBS
6/19/86

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE PREVENTION
OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 USC §7470 et. seq., and the regulations promulgated thereunder at 40 CFR §52.21, as amended at 45 Fed. Reg. 52676, 52735-41, (August 7, 1980).

Hillsborough County Department of Solid Waste

is, as of the effective date of this permit (PSD-FL-104) authorized to construct a stationary source at the following location:

0.6 miles North of State Route 60
between Faulkenburg Road
and the TECO transmission line corridor
in Hillsborough County, Florida

Upon completion of authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Specific Conditions (Part I) and General Conditions (Part II)

This permit is hereby issued on JUL 2 1986
and shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1).

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and local law.

Date Signed

Regional Administrator

PART I

Specific Conditions

1. Emission Limitations

a. Stack emissions from each unit shall not exceed the following:

- (1) Particulate matter: 0.021 grains per dry standard cubic foot corrected to 12% CO₂ (gr/dscf-12%) or 7.0 pounds per hour per unit, whichever is more restrictive.
- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity except that 20% opacity may be allowed for one six-minute period (average of 24 consecutive observations recorded at 15-second intervals) in any one hour. Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by EPA for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited. Opacity of other emission points at the plant shall not exceed 5%.
- (3) VOC: 0.01 gr/dscf-12%, or 0.2 lb/ton, whichever is more restrictive
- (4) SO₂: 0.17 gr/dscf-12% or 3.2 lb/ton, whichever is more restrictive, 24-hour average, 0.45 gr/dscf-12% or 8.5 lb/ton, whichever is more restrictive, 3-hour average
- (5) Nitrogen Oxides: 0.16 gr/dscf-12%, or 3.0 lb/ton, whichever is more restrictive
- (6) Carbon Monoxide: 0.093 gr/dscf-12%, or 1.8 lb/ton, whichever is more restrictive.

- (7) Lead: 0.00104 gr/dscf-12%, or 0.020 lb/ton, whichever is more restrictive.
- (8) Fluorides: 0.0031 gr/dscf-12%, or 0.060 lb/ton, whichever is more restrictive.
- (9) Sulfuric Acid Mist: 0.0040 gr/dscf-12%, or 0.077 lb/ton, whichever is more restrictive.
- (10) Beryllium: 6.8×10^{-7} gr/dscf-12%, or 1.3×10^{-5} lb/ton, whichever is more restrictive.
- (11) Each of the emission limits in conditions (1) and (3) through (10) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (3) through (10) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.
- (12) Mercury: 2200 grams/day
- (13) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. Additionally, all portions of the proposed facility including the ash handling facility which have the potential for fugitive emissions will be enclosed. Also those areas which have to be open for operational purposes, e.g., tipping floor of the refuse bunker while trucks are entering and leaving, will be under negative air pressure.
- (14) Each of the three units is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards

(NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.

- (15) Only natural gas will be used as an auxiliary fuel.

b. Compliance Tests

- (1) Compliance tests for particulate matter, SO₂, nitrogen oxides, CO, VOC, sulfuric acid mist, fluorides, mercury and beryllium shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f), except that an annual test will be conducted for particulate matter. Compliance tests for opacity will be conducted simultaneously during each compliance test run for particulate matter.

Compliance tests shall be conducted for such time and under such conditions as specified by EPA prior to the compliance test. These conditions will be specified by EPA upon notification of performance tests as required by General Condition 1. The permittee shall make available to EPA such records as may be necessary to determine the conditions of the performance tests.

- (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:
- a. Method 1 for selection of sample site and sample traverses
 - b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.

- e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
- f. Method 9 for visible determination of the opacity of emissions.
- g. Method 6 for concentration of SO₂. Two samples, taken at approximately 30 minute intervals, shall constitute one test run.
- h. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.
- i. Method 8 for determination of sulfuric acid mist concentration and associated moisture content. One sample shall constitute one test run.
- j. Method 10 (continuous) for determination of CO concentrations. One sample constitutes one test run.
- k. Method 12 for determination of lead concentration and associated moisture content. One sample constitutes one test run.
- l. Method 25 for determination of volatile organic compounds (VOC) concentration. One sample shall constitute one test run.
- m. Method 13A or 13B for determination of fluoride concentrations and associated moisture content. One sample shall constitute one test run.
- n. Method 101A for determination of mercury emission rate and associated moisture content. One sample shall constitute one test run.
- o. Method 104 for determination of beryllium emission rate and associated moisture content. One sample shall constitute one test run.

(3) The stack tests shall be performed at $\pm 10\%$ of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.

2. The height of the boiler exhaust stack shall be 220 feet above ground level at the base of the stack.
3. The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.
4. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.
5. The permittee must submit to EPA and DER within fifteen (15) days after it becomes available to the County, copies of technical data pertaining to the incinerator boiler design, to the electrostatic precipitator design, and to the fuel mix that can be used to evaluate compliance of the facility with the preceeding emission limitations.
6. Grease, scum, grit screenings or sewage sludge shall not be charged into the solid waste to energy facility boilers.
7. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to limit particulate emissions to no more than 0.021 grains per dscf corrected to 12% CO₂.

8. Stack Monitoring Program

The permittee shall install and operate continuous monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Rule 17-2.710, FAC, 40 CFR Part 60, Subparts A and D, Sections 60.13 and 60.45 respectively, except that emission rates shall be calculated in units consistent with emission limits in this permit. The conversion procedure shall be approved by EPA.

9. Reporting

- a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office, the Hillsborough County Environmental Protection Commission (HCEPC) and EPA Region IV.
- b. Stack monitoring shall be reported to HCEPC, the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

10. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.

11. Addresses for submitting reports are:

a. EPA - Region IV

Chief, Air Compliance Branch
U.S. Environmental Protection Agency
345 Courtland St.
Atlanta, GA 30365

b. DER

Chief, Compliance and Ambient Monitoring
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

c. Southwest District Office of DER

District Manager
Department of Environmental Regulation
7601 Highway 301 N.
Tampa, FL 33610

d. HCEPC

Chief, Air Group
Hillsborough County Environmental
Protection Commission
1900 9th Ave.
Tampa, FL 33605

12. The facility shall provide space for the future installation, if necessary, of a wet or dry flue gas scrubber.

PART II

General Conditions

1. The permittee shall comply with the notification and record-keeping requirements codified at 40 CFR Part 60, Subpart A, § 60.7.
2. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
3. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide EPA with the following information in writing within five (5) days of such conditions:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission, and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of the aforementioned information does not constitute a waiver of the emission limitations contained within this permit.

4. Any proposed change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that would result in new or increased emissions or ambient air quality impact must be reported to EPA. If appropriate, modifications to the permit may then be made by EPA to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein. Any construction or operation of the source in material variance with the application shall be considered a violation of this permit.

5. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit and EPA of the change in control of ownership within 30 days.
6. The permittee shall allow representatives of the state and local environmental control agency or representatives of the EPA upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Clean Air Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emissions of pollutants; and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
7. The conditions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.



Best Available Copy

RECEIVED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

AUG 1 1986
OGDEN WASTE SYSTEMS
OF HILLSBOROUGH, FLA. INC.

JUL 7 1986

RECEIVED

JUL 14 1986

4APT-AP/ch

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

BY SOLID WASTE DEPARTMENT

Mrs. Mary Cummings, Director
Department of Solid Waste
Post Office Box 1110
925 East Twiggs Street
Tampa, Florida 33601

RE: PSD-FL-104

Dear Mrs. Cummings:

Review of your December 13, 1985, application to construct a 1200 tons per day (tpd) Energy Recovery Facility in Hillsborough County, Florida, has been completed. The construction is subject to rules for the Prevention of Significant Deterioration (PSD) of air quality contained in 40 CFR §52.21. The Florida Department of Environmental Regulation (FDER) performed the preliminary determination concerning the proposed construction and published a request for public comment on April 6, 1986. On May 21, 1986, FDER prepared a final determination recommending issuance of the PSD permit by EPA. The final determination contains responses to issues raised during the public comment period.

The Environmental Protection Agency (EPA) has determined that the construction as described in the application meets all the applicable requirements of 40 CFR §52.21. Accordingly, pursuant to 40 CFR 124.15, the Regional Administrator has made a final decision to issue the enclosed Permit to Construct - Part I Specific Conditions and Part II General Conditions. This authority to construct, granted as of the effective date of the permit, is based solely on the requirements of 40 CFR §52.21, air quality. It does not apply to other permits issued by this Agency or by other agencies. Please be advised that a violation of any permit condition, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

This final permit decision is subject to appeal under 40 CFR 124.19 by petitioning the Administrator of the EPA within thirty (30) days after receipt thereof. The petitioner must submit a statement of reasons for the appeal and the Administrator must decide on the petition within a reasonable time period. If the petition is denied, the permit shall become effective upon notice of such action to the parties to the appeal. If no appeal is filed with the Administrator, the permit shall become effective thirty (30) days after receipt of this letter. Upon the expiration of the thirty (30) day period, EPA will notify you of the status of the permit's effective date.

Receipt of this letter does not constitute authority to construct. Approval to construct this facility shall be granted as of the effective date of the permit. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Mr. Bruce P. Miller, Acting Chief, Air Programs Branch at 404/347-2864.

Sincerely yours,

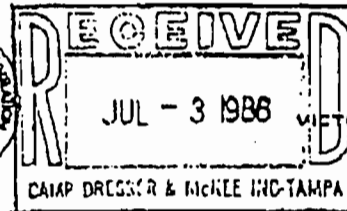


Winston A. Smith, Director
Air, Pesticides, & Toxics
Management Division

Enclosure

cc: Mr. Steve Smallwood, P. E., Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation

Condition of Certification

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATIONTWIN TOWERS OFFICE BUILDING
2800 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241BOB GRAHAM
GOVERNORVICTORIA J. TSCHINKEL
SECRETARY

June 23, 1986

Mr. David S. Dee, Esquire
Carlton, Fields, Ward, Emmanuel,
Smith and Cutler, P.A.
Post Office Drawer 190
Tallahassee, FL 32301

Dear Mr. Dee:

Attached please find a revised copy of the Conditions of Certification for the Hillsborough County Energy Recovery Facility as approved by the Governor and Cabinet on June 17, 1986.

Sincerely,

Hamilton S. Owen, Jr.
Hamilton S. Owen, Jr., P.E.
Administrator
Siting Coordination Section

HSOjr/sh

cc: All Parties

RECEIVED JUN 26 1986

State of Florida Department of Environmental Regulation
Hillsborough County
Energy Recovery Facility
Case No. 83-19
CONDITIONS OF CERTIFICATION

Revised 6/17/86

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State of Florida
Hillsborough County
Energy Recovery Facility
Case No. PA 83-19
CONDITIONS OF CERTIFICATION

I. CONSTRUCTION

The facility shall be constructed, as a minimum, pursuant to the design standards presented in the application.

A. Control Measures

1. Stormwater Runoff

To control runoff during construction which may reach and thereby pollute Waters of the State, necessary measures shall be utilized to settle, filter, treat or absorb silt-containing or pollutant-laden stormwater to insure against spillage or discharge of excavated material that may cause turbidity in excess of 50 Jackson Turbidity Units above background in Waters of the State and to comply with Hillsborough County and Southwest Florida Water Management District stormwater regulations. Control measures may consist of sediment traps, barriers, berms, and vegetation plantings. Exposed or disturbed soil shall be protected and stabilized as soon as possible to minimize silt and sediment-laden runoff. The pH shall be kept within the range of 6.0 to 8.5.

2. Burning

Open burning in connection with land clearing shall be in accordance with Chapter 17-5, FAC, and applicable County regulations. No additional permits shall be required, but prior to each act of burning, the Division of Forestry shall be contacted to determine if satisfactory conditions exist for burning. Open burning shall not occur if the Division of Forestry has issued a ban on burning due to fire hazard conditions.

3. Sanitary Wastes

Disposal of sanitary wastes from construction toilet facilities shall be in accordance with applicable regulations of the appropriate local health agency.

4. Solid Wastes

Solid wastes resulting from construction shall be disposed of in accordance with the applicable regulations of Chapter 17-7, FAC.

5. Noise

Construction noise shall not exceed local noise ordinance specifications, nor those noise standards imposed by zoning.

6. Dust

The County shall employ proper dust-control techniques to minimize fugitive dust emissions.

7. Transmission Lines

The directly associated transmission lines from the Resource Recovery Facility electric generators to the existing Tampa Electric Company (TECO) substation shall be along the existing TECO right-of-way.

B. Environmental Control Program

An environmental control program shall be established under the supervision of a qualified person to assure that all construction activities conform to good environmental practices and the applicable conditions of certification.

If unexpected or harmful effects or evidence of irreversible environmental damage are detected during construction, the permittee shall notify the DER Southwest Florida District Office, 7601 Highway 301 North, Tampa, Florida, 33610, by telephone during the working day that the effect or damage occurs and shall confirm this in writing within seventy-two (72) hours of becoming aware of such conditions, and shall provide in writing an analysis of the problem and a plan to eliminate or significantly reduce the harmful effects of damage.

C. Reporting

1. Starting three (3) months after certification, a quarterly construction status report shall be submitted to the Southwest Florida District Office of the Department of Environmental Regulation. The report shall be a short narrative describing the progress of construction.

2. Upon completion of construction the DER Southwest Florida District Office will be notified in order that a pre-operational inspection can be performed.

II. OPERATION

A. Air

The operation of the Resource Recovery Facility shall be in accordance with all applicable provisions of Chapter 17-2, 17-4, and 17-7, Florida Administrative Code. In addition to the foregoing, the permittee shall comply with the following specific conditions of certification:

1. Emission Limitations

a. Stack emissions from each unit shall not exceed the following:

(1) Particulate matter: 0.021 grains per standard cubic foot dry gas corrected to 12% CO₂ with a maximum cap of 7.0 pounds per hour per unit

(2) SO₂: 3.2 lbs/ton of solid waste-fired, maximum 24 hour average 117 gr/dscf (unre restrictive) .45 dscf or 8.5 lb/ton 3hr Avg

(3) Nitrogen Oxides: 3 lbs/ton .16 gr/dscf

(4) Carbon Monoxide: 1.8 lbs/ton .093 gr/dscf

6)
TOT. UNITS
0175 lb/hr

Lead - .00104 gr or .02 lb/ton
Fluoride .0031 gr or .06 lb/ton
Sulfuric Acid mist .0040 gr or .077 lb/ton
(5) VOC: 0.2 lbs/ton or .01 gr/dscf (none reactive)
(6) Mercury: 2200 grams/day = ~~2.2~~ 4.84 lbs./day

(7) Odor: there shall be no objectionable odor

(8) Visible emissions: opacity shall not be greater than 15% except that visible emissions with no more than 20% opacity may be allowed for up to three minutes in any one hour except during start up or upsets when the provisions of 17-2.250, FAC, shall apply. Opacity compliance shall be demonstrated in accordance with Florida Administrative Code Rule 17-2.700(6)(a)9., DER Method 9.

(9) Beryllium: 13.1×10^{-6} lbs/ton or 6.8×10^{-7} gr/dscf

b. The height of the boiler exhaust stack shall not be less than 220 feet above grade.

c. The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.

d. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.

e. Compliance with the limitations for particulates, sulfur oxides, nitrogen oxides, carbon monoxide and lead shall be determined in accordance with Florida Administrative Code Rule 17-2.700, DER Methods 1, 2, 3, 5, 6, and 40 CFR 60, Appendix A, Method 7. Compliance with the opacity of stack emissions shall be demonstrated in accordance with Florida Administrative Code Rule 17-2.700(6)(a)9., DER Method 9. The stack test shall be performed at +10% of the heat input rate of 150 million Btu per hour; however, compliance with the particulate matter emission limit shall be at design capacity.

f. The permittee must submit to the Department within thirty (30) days after it becomes available, copies of technical data pertaining to the incinerator boiler design, to the electrostatic precipitator design, and to the fuel mix that can be used to evaluate compliance of the facility with the preceeding emission limitations.

g. Grease, scum, grit screenings or sewage sludge will not be charged into the solid waste to energy facility boilers.

2. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to achieve a maximum emission rate of 0.021 grains per dscf.

3. Air Monitoring Program

a. The permittee shall install and operate continuously monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Chapter 17-2.710, FAC, and 40 CFR 60.45, and 40 CFR 60.13, including certification of each device.

b. The permittee shall provide sampling ports into the stack and shall provide access to the sampling ports in accordance with Section 17-2.700(4), FAC.

c. The permittee shall have a sampling test of the stack emissions performed by a commercial testing firm within 90 days of the start of operation of the boilers and annually from the date of testing thereafter.

4. Reporting

a. Two copies of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office.

b. Stack monitoring shall be reported to the DER Southwest District Office on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

B. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate modification of these Conditions of Certification.

C. Cooling Tower

1. Make-up Water Constituency

a. The Resource Recovery Facility shall utilize only treated sewage effluent or stormwater runoff from the stormwater holding pond as cooling tower makeup water. The effluent shall have received prior to use in the tower, as a minimum, secondary treatment, as well as treatment described in Condition II.C.2 below. Use of waters other than treated sewage effluent or site stormwater, i.e., higher quality potable waters or lower quality less-than-secondarily treated sewage effluent will require a modification of conditions agreed to by the Southwest Florida Water Management District and the Department and must be approved by the Governor and Cabinet.

b. Notwithstanding the provisions of condition II.C.1.(a), Hillsborough County may use potable water as cooling

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tower makeup water: (i) on an interim basis for 24 months; (ii) on an emergency basis, after the Northwest Brandon Subregional Wastewater Treatment Plant is operational, whenever the wastewater treatment plant is unable to produce treated wastewater of suitable quality or quantities, if the County determines and the SWFWMD agrees that it is not feasible to use other sources of water; and (iii) under such other circumstances as may arise, if such use is approved in writing by the DER and SWFWMD.

c. Hillsborough County may use treated effluent or potable water at any time as boiler makeup water.

d. Hillsborough County will report to the SWFWMD the daily quantities of potable or fresh water utilized as makeup water for the cooling tower. This data will be supplied on a monthly basis, with reports due by the 10th day of the month following data collection.

e. To implement condition II.C.1.(b)(ii), above, Hillsborough County shall submit reports to the SWFWMD concerning the feasibility of using other sources of water for emergency purposes. A progress report shall be submitted to SWFWMD on June 1, 1987 and a final report shall be submitted on June 1, 1988.

2. Chlorination

Chlorine levels in the cooling tower makeup water shall continuously be monitored, prior to insertion in the cooling towers. Sewage effluent from the Brandon Subregional Wastewater Treatment Plant or alternate used as makeup shall be treated if necessary.

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to maintain a 1.0 mg/liter total chlorine residual after fifteen minutes contact time at average daily flow, whichever provides a higher level of public health protection.

D. Water Discharges

1. Any discharges from the site stormwater treatment system via the emergency overflow structure shall meet State Water Quality Standards, Chapter 17-3, FAC, shall comply with Hillsborough County and Southwest Florida Water Management District regulations, and shall comply with Chapter 17-25, FAC.

2. Cooling tower blowdown shall not be discharged to surface waters.

E. Operational Safeguards

The overall design and layout of the facilities shall be such as to minimize hazards to humans and the environment. Security control measures shall be utilized to prevent exposure of the public to hazardous conditions. The Federal Occupational Safety and Health Standards will be complied with during construction and operation. The safety standards specified under Section 440.56, Florida Statutes, by the Industrial Safety Section of the Florida Department of Commerce will be complied with during operation.

F. Transmission Lines

The directly associated transmission lines from the Resource Recovery Facility electric generator to the TECO Substation shall be kept cleared without the use of herbicides.

C. Noise

Operational noises shall not exceed local noise ordinance limitations nor those noise standards imposed by zoning.-

III. CHANGE IN DISCHARGE

All discharges or emissions authorized herein shall be consistent with the terms and conditions of this certification. The discharge of any regulated pollutant not identified in the application, or more frequent than, or at a level in excess of that authorized herein, shall constitute a violation of the certification. Any anticipated facility expansions, production increases, or process modifications which may result in new, different, or increased discharges or pollutants, change in fuel, or expansion in steam generating capacity must be reported by submission of a new or supplemental application pursuant to Chapter 403, Florida Statutes.

IV. NON-COMPLIANCE NOTIFICATION

If, for any reason, the permittee does not comply with or will be unable to comply with any limitation specified in this certification, the permittee shall notify the Southwest Florida District Manager of the Department by telephone during the working day that said non-compliance occurs and shall confirm this in writing within seventy-two (72) hours of becoming aware of such conditions and shall supply the following information:

A. A description of the discharge and cause on non-compliance; and

B. The period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying event.

V. FACILITIES OPERATION

The permittee shall at all times maintain in good working order and operate as efficiently as possible any treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this certification. Such systems are not to be bypassed without prior Department approval.

VI. ADVERSE IMPACT

The permittee shall take all reasonable steps to minimize any adverse impact resulting from non-compliance with any limitation specified in this certification, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

VII. RIGHT OF ENTRY

The permittee shall allow the Secretary of the Florida Department of Environmental Regulation and/or authorized representatives, upon the presentation of credentials:

- A. To enter upon the permittee's premises where an effluent source is located or in which records are required to be kept under the terms and conditions of this permit, and
- B. To have access to and copy any records required to be kept under the conditions of this certification, and
- C. To inspect and test any monitoring equipment or monitoring method required in this certification and to sample any discharge or pollutants, and
- D. To assess any damage to the environment or violation of ambient standards.

VIII. REVOCATION OR SUSPENSION

This certification may be suspended or revoked pursuant to Section 403.512, Florida Statutes, or for violations of any of its conditions.

IX. CIVIL AND CRIMINAL LIABILITY

This certification does not relieve the permittee from civil or criminal penalties for non-compliance with any conditions of this certification, applicable rules or regulations of the Department or Chapter 403, Florida Statutes, or regulations thereunder.

Subject to Section 403.511, Florida Statutes, this certification shall not preclude the institution of any legal action or relieve the permittee from any responsibilities, or penalties established pursuant to any other applicable State Statutes, or regulations.

X. PROPERTY RIGHTS

The issuance of this certification does not convey any property rights in either real or personal property, nor any exclusive privileges, nor does it authorize any injury to public or private property or any invasion of personal rights nor any infringement of Federal, State or local laws or regulations.

XI. SEVERABILITY

The provisions of this certification are severable, and if any provision of this certification or the application of any provision of this certification to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of the certification shall not be affected thereby.

XII. DEFINITIONS

The meaning of terms used herein shall be governed by the definitions contained in Chapter 403, Florida Statutes, and any regulations adopted pursuant thereto. In the event of any dispute over the meaning of a term in these general or special conditions which is not defined in such statutes or regulations, such dispute shall be resolved by reference to the most relevant definitions contained in any other state or federal statute or regulation or, in the alternative, by the use of the commonly accepted meaning as determined by the Department.

XIII. REVIEW OF SITE CERTIFICATION

The certification shall be final unless revised, revoked or suspended pursuant to law. At least every five years from the date of issuance of certification the Department shall review all monitoring data that has been submitted to it during the preceding five-year period for the purpose of determining the extent of the permittee's compliance with the conditions of this certification and the environmental impact of this facility. The Department shall submit the results of its review and recommendations to the permittee. Such review will be repeated at least every five years thereafter.

XIV. MODIFICATION OF CONDITIONS

Pursuant to Subsection 403.516(1), F.S., the Board hereby delegates the authority to the Secretary to modify any condition of this certification dealing with sampling, monitoring, reporting, specification of control equipment, related time schedules, SO₂ emission limitations subject to notice and opportunity for hearing, or any special studies conducted, as necessary to attain the objectives of Chapter 403, Florida Statutes.

All other modifications shall be made in accordance with Section 403.516, Florida Statutes.

State of Florida Department of Environmental Regulation
Hillsborough County
Energy Recovery Facility
Case No. 83-19
CONDITIONS OF CERTIFICATION

Revised 6/17/86

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State of Florida
Hillsborough County
Energy Recovery Facility
Case No. PA 83-19
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(3) Nitrogen Oxides: 3 lbs/ton

(4) Carbon Monoxide: 1.8 lbs/ton

(5) VOC: 0.2 lbs/ton

(6) Mercury: 2200 grams/day

(7) Odor: there shall be no objectionable odor

(8) Visible emissions: opacity shall not be greater than 15% except that visible emissions with no more than 20% opacity may be allowed for up to three minutes in any one hour except during start up or upsets when the provisions of 17-2.250, FAC, shall apply. Opacity compliance shall be demonstrated in accordance with Florida Administrative Code Rule 17-2.700(6)(a)., DER Method 9.

(9) Beryllium: 13.1×10^{-6} lbs/ton

b. The height of the boiler exhaust stack shall not be less than 220 feet above grade.

c. The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.

d. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.

e. Compliance with the limitations for particulates, sulfur oxides, nitrogen oxides, carbon monoxide and lead shall be determined in accordance with Florida Administrative Code Rule 17-2.700, DER Methods 1, 2, 3, 5, 6, and 40 CFR 60, Appendix A, Method 7. Compliance with the opacity of stack emissions shall be demonstrated in accordance with Florida Administrative Code Rule 17-2.700(6)(a)9., DER Method 9. The stack test shall be performed at +10% of the heat input rate of 150 million Btu per hour; however, compliance with the particulate matter emission limit shall be at design capacity.

f. The permittee must submit to the Department within thirty (30) days after it becomes available, copies of technical data pertaining to the incinerator boiler design, to the electrostatic precipitator design, and to the fuel mix that can be used to evaluate compliance of the facility with the preceeding emission limitations.

g. Grease, scum, grit screenings or sewage sludge will not be charged into the solid waste to energy facility boilers.

2. Electrostatic Precipitator

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3. Air Monitoring Program

a. The permittee shall install and operate continuously monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Chapter 17-2.710, FAC, and 40 CFR 60.45, and 40 CFR 60.13, including certification of each device.

b. The permittee shall provide sampling ports into the stack and shall provide access to the sampling ports in accordance with Section 17-2.700(4), FAC.

c. The permittee shall have a sampling test of the stack emissions performed by a commercial testing firm within 90 days of the start of operation of the boilers and annually from the date of testing thereafter.

4. Reporting

a. Two copies of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office.

b. Stack monitoring shall be reported to the DER Southwest District Office on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

B. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate modification of these Conditions of Certification.

C. Cooling Tower

1. Make-up Water Constituency

a. The Resource Recovery Facility shall utilize only treated sewage effluent or stormwater runoff from the stormwater holding pond as cooling tower makeup water. The effluent shall have received prior to use in the tower, as a minimum, secondary treatment, as well as treatment described in Condition II.C.2 below. Use of waters other than treated sewage effluent or site stormwater, i.e., higher quality potable waters or lower quality less-than-secondarily treated sewage effluent will require a modification of conditions agreed to by the Southwest Florida Water Management District and the Department and must be approved by the Governor and Cabinet.

b. Notwithstanding the provisions of condition II.C.1.(a), Hillsborough County may use potable water as cooling

tower makeup water: (i) on an interim basis for 24 months; (ii) on an emergency basis, after the Northwest Brandon Subregional Wastewater Treatment Plant is operational, whenever the wastewater treatment plant is unable to produce treated wastewater of suitable quality or quantities, if the County determines and the SWFWMD agrees that it is not feasible to use other sources of water; and (iii) under such other circumstances as may arise, if such use is approved in writing by the DER and SWFWMD.

c. Hillsborough County may use treated effluent or potable water at any time as boiler makeup water.

d. Hillsborough County will report to the SWFWMD the daily quantities of potable or fresh water utilized as makeup water for the cooling tower. . This data will be supplied on a monthly basis, with reports due by the 10th day of the month following data collection.

e. To implement condition II.C.1.(b)(ii), above, Hillsborough County shall submit reports to the SWFWMD concerning the feasibility of using other sources of water for emergency purposes. A progress report shall be submitted to SWFWMD on June 1, 1987 and a final report shall be submitted on June 1, 1988.

2. Chlorination

Chlorine levels in the cooling tower makeup water shall continuously be monitored, prior to insertion in the cooling towers. Sewage effluent from the Brandon Subregional Wastewater Treatment Plant or alternate used as makeup shall be treated if necessary

to maintain a 1.0 mg/liter total chlorine residual after fifteen minutes contact time at average daily flow, whichever provides a higher level of public health protection.

D. Water Discharges

1. Any discharges from the site stormwater treatment system via the emergency overflow structure shall meet State Water Quality Standards, Chapter 17-3, FAC, shall comply with Hillsborough County and Southwest Florida Water Management District regulations, and shall comply with Chapter 17-25, FAC.

2. Cooling tower blowdown shall not be discharged to surface waters.

E. Operational Safeguards

The overall design and layout of the facilities shall be such as to minimize hazards to humans and the environment. Security control measures shall be utilized to prevent exposure of the public to hazardous conditions. The Federal Occupational Safety and Health Standards will be complied with during construction and operation. The safety standards specified under Section 440.56, Florida Statutes, by the Industrial Safety Section of the Florida Department of Commerce will be complied with during operation.

F. Transmission Lines

The directly associated transmission lines from the Resource Recovery Facility electric generator to the TECO Substation shall be kept cleared without the use of herbicides.

G. Noise

Operational noises shall not exceed local noise ordinance limitations nor those noise standards imposed by zoning.

III. CHANGE IN DISCHARGE

All discharges or emissions authorized herein shall be consistent with the terms and conditions of this certification. The discharge of any regulated pollutant not identified in the application, or more frequent than, or at a level in excess of that authorized herein, shall constitute a violation of the certification. Any anticipated facility expansions, production increases, or process modifications which may result in new, different, or increased discharges or pollutants, change in fuel, or expansion in steam generating capacity must be reported by submission of a new or supplemental application pursuant to Chapter 403, Florida Statutes.

IV. NON-COMPLIANCE NOTIFICATION

If, for any reason, the permittee does not comply with or will be unable to comply with any limitation specified in this certification, the permittee shall notify the Southwest Florida District Manager of the Department by telephone during the working day that said non-compliance occurs and shall confirm this in writing within seventy-two (72) hours of becoming aware of such conditions and shall supply the following information:

A. A description of the discharge and cause on non-compliance; and

B. The period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying event.

V. FACILITIES OPERATION

The permittee shall at all times maintain in good working order and operate as efficiently as possible any treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this certification. Such systems are not to be bypassed without prior Department approval.

VI. ADVERSE IMPACT

The permittee shall take all reasonable steps to minimize any adverse impact resulting from non-compliance with any limitation specified in this certification, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

VII. RIGHT OF ENTRY

The permittee shall allow the Secretary of the Florida Department of Environmental Regulation and/or authorized representatives, upon the presentation of credentials:

A. To enter upon the permittee's premises where an effluent source is located or in which records are required to be kept under the terms and conditions of this permit, and

B. To have access to and copy any records required to be kept under the conditions of this certification, and

C. To inspect and test any monitoring equipment or monitoring method required in this certification and to sample any discharge or pollutants, and

D. To assess any damage to the environment or violation of ambient standards.

VIII. REVOCATION OR SUSPENSION

This certification may be suspended or revoked pursuant to Section 403.512, Florida Statutes, or for violations of any of its conditions.

IX. CIVIL AND CRIMINAL LIABILITY

This certification does not relieve the permittee from civil or criminal penalties for non-compliance with any conditions of this certification, applicable rules or regulations of the Department or Chapter 403, Florida Statutes, or regulations thereunder.

Subject to Section 403.511, Florida Statutes, this certification shall not preclude the institution of any legal action or relieve the permittee from any responsibilities, or penalties established pursuant to any other applicable State Statutes, or regulations.

X. PROPERTY RIGHTS

The issuance of this certification does not convey any property rights in either real or personal property, nor any exclusive privileges, nor does it authorize any injury to public or private property or any invasion of personal rights nor any infringement of Federal, State or local laws or regulations.

XI. SEVERABILITY

The provisions of this certification are severable, and if any provision of this certification or the application of any provision of this certification to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of the certification shall not be affected thereby.

XII. DEFINITIONS

The meaning of terms used herein shall be governed by the definitions contained in Chapter 403, Florida Statutes, and any regulations adopted pursuant thereto. In the event of any dispute over the meaning of a term in these general or special conditions which is not defined in such statutes or regulations, such dispute shall be resolved by reference to the most relevant definitions contained in any other state or federal statute or regulation or, in the alternative, by the use of the commonly accepted meaning as determined by the Department.

XIII. REVIEW OF SITE CERTIFICATION

The certification shall be final unless revised, revoked or suspended pursuant to law. At least every five years from the date of issuance of certification the Department shall review all monitoring data that has been submitted to it during the preceding five-year period for the purpose of determining the extent of the permittee's compliance with the conditions of this certification and the environmental impact of this facility. The Department shall submit the results of its review and recommendations to the permittee. Such review will be repeated at least every five years thereafter.

XIV. MODIFICATION OF CONDITIONS

Pursuant to Subsection 403.516(1), F.S., the Board hereby delegates the authority to the Secretary to modify any condition of this certification dealing with sampling, monitoring, reporting, specification of control equipment, related time schedules, SO₂ emission limitations subject to notice and opportunity for hearing, or any special studies conducted, as necessary to attain the objectives of Chapter 403, Florida Statutes.

All other modifications shall be made in accordance with Section 403.516, Florida Statutes.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

May 30, 1986

Mr. Bruce P. Miller
Acting Chief
Air Programs Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Miller:

RE: Final Determination - Hillsborough County Resource
Recovery Facility, PSD-FL-104

Enclosed please find the department's response to your comments on the Final Determination for the subject project. We recommend that the applicant be granted Authority to Construct, subject to the conditions in the Final Determination as amended.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosure

cc: David S. Dee
Bill Thomas
Iwan Choronenko

BEST AVAILABLE COPY

CARLTON, FIELDS, WARD, EMMANUEL, SMITH & CUTLER, P. A.

ATTORNEYS AT LAW

TAMPA - ORLANDO - PENSACOLA - TALLAHASSEE

LEWIS STATE BANK BUILDING

POST OFFICE DRAWER 190

TALLAHASSEE, FLORIDA 32302

(904) 224-1585

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GEORGE ZADROCHNY
PETER W. ZINDER

May 20, 1986

Mr. Ed Svec
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Hillsborough County Resource Recovery Facility

Dear Ed:

I am sending you this letter to confirm our understanding about the comments you received from the U.S. Environmental Protection Agency concerning the Preliminary Determination and Draft Permit for the Hillsborough County resource recovery facility.

First, the EPA comment concerning Section 17-2.660, F.A.C., appears to be redundant. Section 17-2.660, F.A.C., establishes New Source Performance Standards that are based on the Clean Air Act, which is already cited in the Preliminary Determination. If EPA believes there is a meaningful distinction between Section 17-2.660, F.A.C. and the previously cited regulations, we would like to be advised in writing of this distinction so that we can determine whether to oppose the proposed EPA language. If, as it appears, there is no distinction, we have no objection to the additional citation recommended by EPA.

We have no objections to EPA's comments in their paragraphs no. 2, 3, 4, and 5.

Mr. Ed Svec
May 20, 1986
Page Two

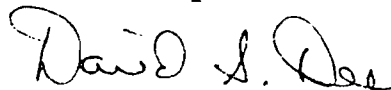
With regard to EPA comment no. 6, Hillsborough County does not object to a permit requirement which states:

"Hillsborough County shall provide space at the resource recovery facility for the future installation, if necessary, of a wet or dry flue gas scrubber."

The Hillsborough County facility is already substantially complete. It has space for a scrubber, if a scrubber is required by DER or EPA in the future. Please note, however, that the facility would need substantial additional work and retrofitting before a scrubber could be installed.

Finally, Hillsborough County disagrees with EPA's comment no. 7. Hillsborough County proposed an emission rate of 0.048 pounds per ton for lead. EPA proposed the emission limit of 0.020 pounds per ton. After substantial discussion, Hillsborough County reluctantly agreed to a permit condition of 0.020 pounds per ton, but that limit was not proposed by the County.

Sincerely,



David S. Dee

DSD/mm

cc: Mary Cummings
Don Elias



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MAY 9 1986

REF: 4APT/AP

C. H. Fancy, P. E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

We have several comments on your March 25, 1986, PSD Preliminary Determination and Draft Permit for the Hillsborough County Energy Recovery Facility.

- 1) Page 3: From our reading of the Florida regulations, it appears that the source would also be subject to 17-2.660, the state NSPS. If so, this should be mentioned in this paragraph, as well as at the end of this section and in IV.b. on Page 10.
- 2) Page 7: As agreed to by EPA in meetings with the County, the SO₂ 3-hour limitation of 8.5 lb/ton is to protect the NAAQS, and is not necessarily BACT. BACT is 3.2 lb/ton 24-hour average.
- 3) Page 27: In Condition (11), "(2)" should be "(3)". Condition (2) is an opacity limit.
- 4) Page 28: In b.(1), the eighth line should begin with "during each" instead of "with the".
- 5) Table II-1: The emission rate for mercury should be 0.89 instead of 1.1.
- 6) The permit should contain a requirement that the facility include provision for the future installation of a wet or dry flue gas scrubber, if deemed necessary by EPA. This requirement is described on pages 9 and 10 of the Preliminary Determination.
- 7) Since the County has agreed to 0.020 lb/ton limit for lead, the list of emission rates proposed by the applicant on page 7 of the Preliminary Determination should include 0.020 for lead, instead of 0.048.

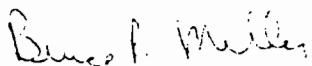
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MAY 8 1986

BAQM

If you have any questions about our comments, please
contact Roger Pfaff at (404) 347-4253.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Bruce P. Miller".

Bruce P. Miller
Acting Chief
Air Programs Branch
Air, Pesticides, & Toxics
Management Division

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
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VICTORIA J. TSCHINKEL
SECRETARY

May 30, 1986

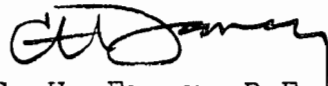
Mr. Bruce P. Miller
Acting Chief
Air Programs Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Miller:

RE: Final Determination - Hillsborough County Resource
Recovery Facility, PSD-FL-104

Enclosed please find the department's response to your comments on the Final Determination for the subject project. We recommend that the applicant be granted Authority to Construct, subject to the conditions in the Final Determination as amended.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosure

cc: David S. Dee
Bill Thomas
Iwan Choronenko

Final Determination

Hillsborough County Energy Recovery Facility's Prevention of Significant Deterioration permit application has been reviewed by the Florida Bureau of Air Quality Management. Public notice of the Intent to Issue the permit was published in the Tampa Tribune on April 6, 1986.

Copies of the preliminary determination have been available for public inspection at the Florida Department of Environmental Regulation's Southwest District office in Tampa and the Bureau of Air Quality Management office in Tallahassee.

These comments on the preliminary determination and draft permit were received from the United States Environmental Protection Agency, Region IV:

1. Does the state NSPS (17-2.660) apply? Yes, it does apply. However, this section was adopted by reference and because this is a federal PSD permit, we do not feel that this cite is necessary.
2. The 3-hour SO₂ limit is not necessarily BACT. The mention of this limit as BACT has been stricken.

3. In Condition (11), the (2) should be (3). Condition (11) has been changed to reflect this.
4. Wording change on page 28: "During each" has been substituted for "with the" in paragraph b.(1).
5. Mercury emission rate in Table II-1: This is the rate proposed by the county at the time of the application. BACT for mercury was determined to be less than the county's proposal. No change is needed to Table II-1.
6. Scrubber condition: Condition 12 has been added to the permit. This condition requires that space for a scrubber be provided should the future installation of a scrubber be necessary.
7. Lead limit: The county proposed a lead limit of 0.048 lb/ton when they applied for the permit. After negotiating with the EPA, the county accepted a limit of 0.020 lb/ton. The statement on page 7 of the preliminary determination identifies the limits as "the applicant has proposed". For this reason, this lead limit will not be changed.

The Bureau of Air Quality recommends that the PSD permit be issued with the changes discussed above.

Final Determination

and Permit

Hillsborough County Energy Recovery Facility

Hillsborough County, Florida

PSD-FL-104

Prevention of Significant Deterioration

40 CFR 52.21

Review performed by Florida Department of Environmental
Regulation

May 21, 1986

I. INTRODUCTION

Pursuant to Section 403.505, Florida Statutes, Hillsborough County applied to the Florida Department of Environmental Regulation (DER) in August 1984 for certification of a steam electric generating, solid waste energy recovery facility at a site about two miles east of the town of Tampa on the county's Faulkenburg Road site. After a thorough review by DER, including public hearings, the Florida Power Plant Siting Board issued a site certification to the County. At that time, DER believed that such a site certification constituted a legal prevention of significant deterioration (PSD) permit under Chapter 17-2.500 of the Florida air pollution regulations which had been approved by the U.S. Environmental Protection Agency (EPA) on December 22, 1983. In the summer of 1985, EPA became aware that the Florida Electrical Power Plant Siting Act (PPSA) under which the site certification was issued, restricts the authority of the State of Florida to implement any regulation pertaining to power plants other than those set out in the Act. Consequently, EPA determined that the Florida PSD regulations are superceded by the PPSA, and could not legally be approved by EPA as part of the State Implementation Plan (SIP) since the PPSA does not comply in part (as to PPSA covered sources) with EPA PSD regulations both procedurally and substantively. Thus, EPA concluded that the Hillsborough County energy recovery facility (ERF), which was under construction, did not possess a valid PSD permit. EPA's remedy for this situation was to issue an Order under Section 167 of the Clean Air Act for Hillsborough County to either cease construction or apply for a federal PSD permit under 40 CFR 52.21. EPA plans to issue in the near future a Federal Register notice clarifying its retention of PSD permitting authority as to sources subject to the PPSA. See also 51 Fed. Reg. 58 (Jan. 2, 1986).

On December 13, 1985, Hillsborough County applied to DER for a PSD permit. (By that time, DER had been given authority by EPA to conduct the technical and administrative steps of the federal PSD permitting process.) In conducting the PSD review, EPA decided that, due to the unique circumstances of this permit application, the best available control technology (BACT) analysis would be conducted taking into account the factors affecting BACT at the time the County submitted a complete application for a site certification. That date was August 16, 1984.

Hillsborough County did not agree that it lacks a valid PSD permit and sought judicial review of the EPA order requiring a federal permit. Hillsborough County submitted to the federal PSD

permitting process under protest. EPA and Hillsborough County entered into a settlement whereby EPA agreed to propose this draft permit and Hillsborough agreed to dismiss its petition for review.

The proposed project will be an energy recovery facility boiler which could use up to 1200 tons per day (TPD) of refuse as fuel. A proposed boiler expansion could increase the total solid waste processing capacity of the plant to 1600 TPD. The steam from the new boiler will be sent to a turbine generator with a capacity of 29 megawatts (MW) (gross). Hillsborough County has contracted with a full service vendor to design, construct, and operate the plant for 20 years. Generated electricity will be transmitted to the Tampa Electric Company (TECO) for distribution over the TECO transmission system. The generating capacity of the expanded plant should be approximately 39 MW. The primary purpose of the facility is to dispose of solid waste. In addition to electricity, steam, ferrous metals, and aluminum could be recovered resources. Non-processible waste (including non-combustibles and demolition debris) and unusable residue will be buried at a licensed, off-site sanitary landfill. The sale of electricity, and eventually other processed and recovered resources, will help offset the overall cost of owning and operating the facility.

The Energy Recovery Facility (ERF) will be located on approximately 50.4 acres within the County's existing Faulkenburg Road tract. The site is located approximately 0.6 miles north of State Road 60. It is bordered by Faulkenburg Road on the east and a TECO 230 KV transmission line corridor on the west, and the Seaboard System Railroad on the south. The plant site is mostly level grassy land with scattered trees in the northwest portion. The site has been recently used as improved pasture for cattle grazing. The topography is fairly level, with elevation ranging from 27 to 45 feet above sea level across the tract. Geology of the site shows an overburden of sand and clay lying over limestone and dolomite which forms the Floridan aquifer. The overburden forms a subsurface reservoir called the shallow aquifer. The proposed facilities will consist of a 29 MW steam electric generating turbine; three 400 tons per day mass-burn solid waste fired boilers; a mechanical draft cooling tower utilizing treated sewage effluent; a 220 foot flue gas stack and electrostatic precipitators. Provisions are made to allow the addition of another 400 tons per day boiler.

Tampa Electric Company's existing 230 KV transmission line corridor will be used to transmit the electricity from the Energy Recovery Facility (ERF).

II. Rule Applicability

The proposed site of the Hillsborough County ERF is in an area designated as nonattainment for ozone and particulate matter under 40 CFR 81.310, and attainment for all other criteria pollutants.

New major sources which emit attainment pollutants regulated under the Clean Air Act in amounts greater than certain significance levels, are subject to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The significance levels are specified by the PSD regulations.

New major sources in Hillsborough County which are subject to the PPSA and which are major for a nonattainment pollutant will be subject to 40 CFR 52.24 Statutory restriction on new stationary sources (construction ban). New municipal incinerators capable of charging greater than 50 TPD are also subject to 40 CFR 60, Subpart E, New Source Performance Standards (NSPS).

New municipal incinerators with a charging rate equal to greater than 50 TPD are also subject to Florida Rule 17-2.600(1)(c).

The applicant is proposing the construction of three 400 TPD mass burn technology incinerators for the processing of up to 1200 TPD of municipal solid waste. A fourth unit of similar size may be constructed in the future but will not be addressed in this review.

The maximum annual emissions from all three units for all regulated pollutants have been estimated by the applicant. These emission rates, and the PSD significant emission rates, are listed in Table II.1.

The proposed source has the potential to emit more than 100 tons per year of one or more regulated pollutants and is, therefore, subject to review for Prevention of Significant Deterioration (PSD) under 40 CFR 52.21. PSD review includes, among other requirements, a determination of Best Available Control Technology (BACT) and an air quality impact analysis for each attainment and noncriteria pollutant that would be emitted in a significant amount as listed in Table II-1. For the proposed source, the applicant has addressed PSD review for the eight pollutants which will be emitted in significant amounts: SO₂, CO, NO_x, Pb, Be, Hg, fluorides, and sulfuric acid mist.

The proposed source will emit less than 100 TPY of both particulate matter and VOC (precursor of ozone), and is thus not subject to the construction ban of 40 CFR 52.24. The proposed incinerators will each have a charging rate of 400 tons per day,

and thus are subject to NSPS and 17-2.600(1)(c). NSPS requires that the source meet a particulate emission rate of 0.08 grains per dry standard cubic foot (gr/dscf), corrected to 12% CO₂. Regulation 17-2.600(1)(c) requires each incinerator to emit no more than .08 gr/dscf particulate corrected to 50% excess air.

III. Preliminary Determination

As noted in Section I, Table II-1, the proposed source will result in significant emissions of the criteria pollutants SO₂, CO, NO_x, and lead, and of the non-criteria pollutants mercury, beryllium, fluorides, and sulfuric acid mist.

The review required under the prevention of significant deterioration (PSD) regulations for these pollutants includes:

- Compliance with all applicable SIP, NSPS, and National Emission Standards for Hazardous Pollutants (NESHAP) regulations

- BACT

- An analysis of existing air quality;

- A PSD increment analysis (for SO₂ only);

- An Ambient Air Quality Standards (AAQS) analysis;

- An analysis of impacts on soils, vegetation, visibility, and growth-related air quality impacts, and;

- A "Good Engineering Practice" (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected in accordance with EPA-approved methods. The PSD increment and AAQS analyses depend on air quality dispersion modeling carried out in accordance with EPA guidelines. BACT is specified on a case-by-case basis considering environmental, economic, and energy impacts.

Based on these required analyses, the Department has reasonable assurance that the proposed units at the Hillsborough County ERF, as described in this report and subject to the conditions of approval proposed herein, will employ BACT, will not cause or contribute to a violation of any PSD increment or ambient air quality standard, and will comply with all applicable air pollution regulations. A discussion of all review components follows.

Table II-1

Hillsborough County Resource Project
Proposed Annual Emission Rates

Pollutant	Proposed Maximum Emission Rate (Ton/Yr) (1)	Significant Emission Rate for PSD Applicability
Particulate Matter (PM) (2)	90	N/A
Volatile Organic Compounds (2)	44	N/A
Sulfur Dioxide (SO ₂)	701	40
Carbon Monoxide (CO)	395	100
Nitrogen Oxides (NO _x)	657	40
Lead (Pb)	4.4	0.6
Mercury (Hg)	1.1	0.1
Beryllium (Be)	0.003	0.0004
Fluorides	13	3
Sulfuric Acid Mist	17	7
		-

(1) Based on processing 1200 tons per day MSW for 365 days per year

(2) Nonattainment Pollutant

IV. Control Technology Review

a. BACT Determination

40 CFR 52.21 (j) requires that each pollutant subject to PSD review must be controlled by BACT. For the proposed three unit plant, eight pollutants are subject to BACT. The BACT emission limits proposed by the Department are summarized as follows:

<u>Pollutant</u>	<u>BACT</u>
Sulfur Dioxide	3.20 lb/ton
Nitrogen Oxides	3.0 lb/ton
Carbon Monoxide	1.80 lb/ton
Lead	.020 lb/ton
Mercury	2200 grams/day
Beryllium	1.3×10^{-5} lb/ton
Sulfuric acid mist	.077 lb/ton
Fluorides	.060 lb/ton

Also included as proposed permit conditions are limits on particulate emissions, opacity, and VOC. These limits are required to insure the emissions of particulate and VOC do not exceed the threshold level for applicability of the construction ban.

The applicant ultimately plans to construct a 1600 ton per day municipal solid waste (MSW) incinerator facility to be located on Faulkenburg Road in Tampa, Florida. The heat energy from combustion of the MSW will be used to produce steam to operate a 39 megawatt output turbine generator. Some of the electric energy produced will be used at the facility with the surplus power to be sold to the Tampa Electric Company.

The present plans are to install three 400 tons per day (TPD) incinerator-boiler units to process a total of 1200 TPD of MSW and generate 29 megawatts of electrical power. The fourth unit will be added at some future time. This BACT determination is for the three units only. Before the fourth unit is installed, the applicant must apply for a new permit for that unit.

Each incinerator will have an approximate heat input of 150 million Btu per hour, or 49 megawatts, based upon a MSW calorific content of 4500 Btu per pound. Each incinerator will be scheduled to operate 8760 hours per year and on this basis the tons per year of the various air pollutants emitted was calculated.

Based upon air pollutant emission factors provided by the applicant, the calculated total annual tonnage of regulated air pollutants emitted from the three units to the atmosphere is listed in Table II-1.

The applicant has proposed the following air pollutant emission limits, on a pound per ton basis: Particulate-0.41, CO-1.8, SO₂-3.2, NO_x-3.0, Pb-0.048, Hg-0.0052, Be-13.1 x10⁻⁶, sulfuric acid mist-0.077, fluorides-0.06, and VOC-0.2 lb/ton. An electrostatic precipitator (ESP) will be used to control the particulate, Pb, Hg, and Be emissions. Design and operating procedures will control the emission of VOC, CO and NO_x. The firing of only MSW, a low sulfur content fuel, will limit SO₂ and sulfuric acid mist emissions.

The applicant has requested emission limits for SO₂ to be a 24-hour limit of 3.2 pounds per ton of MSW charged into the incinerator and a 3-hour limit of 8.5 pounds per ton of MSW charged into the incinerator. Emission test data from Westchester County, New York and Gallatin, Tennessee solid waste combustion sources indicate a range for SO₂ emissions from 2.6 to 3.5 pounds per ton of feed.

The 3.2 figure is judged to be BACT. The amount of SO₂ emitted would be comparable to the burning of distillate oil having a 0.35 percent sulfur content. Burning low sulfur fuel is one acceptable method of controlling SO₂ emissions. The installation of a flue gas desulfurization system to control SO₂ emissions is not warranted when burning MSW.

The mercury emission limit determined as BACT is equal to 69% of the National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 61.50, Subpart E, for municipal waste water sludge incineration plants. The provisions of this subpart, however, do not apply because no grease, scum, grit screenings or sewage sludge will be incinerated in the proposed incinerators. According to the report "Air Pollution Control at Resource Recovery Facilities" issued by the California Air Resources Board, the average mercury emission factor when firing MSW is 4 x 10⁻⁴ pounds per million Btu. This amounts to 30 grams per hour per unit and is not considered to have a major impact on the environment. The applicant has proposed a mercury emission rate of 0.0052 lb/ton which is 0.0013 lb/ton higher than the referenced factor. The BACT is determined to be 2200 grams/day.

The uncontrolled emission of beryllium, according to the California report, when firing MSW is estimated to be 6.2 x 10⁻⁶ pounds per million Btu. Uncontrolled beryllium emissions would be approximately 11 grams per 24 hours or 0.01 TPY. The operating temperature of the particulate matter emission control device will be below 500 F. Operation below this temperature is

necessary to force absorption/condensation of beryllium oxides, present in the flue gas stream, onto available fly ash particles subsequently removed by the control device. Assuming 95% efficiency of the control device the annual beryllium emissions are estimated at 0.0007 tons per year. This amount of beryllium emitted is considered to have a negligible impact on the environment. The emission factor of 13.1×10^{-6} lb/ton MSW proposed by the applicant is judged to be BACT. If beryllium containing waste as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart C, Subsection 61.31(g), were charged into the incinerator, emissions of beryllium to the atmosphere could not exceed 10 grams per 24 hours or an ambient concentration of 0.01 ug/m³, 30 day average. Compliance with this beryllium emission limit would be in accordance with NESHAP, Subpart C. However, the applicant has not applied to burn beryllium-containing waste, and the permit prohibits this activity.

The temperature of the incinerator combustion gases at the inlet to the particulate control device is estimated to be 425-475 °F. At these temperatures any lead would be in a nonvaporous state and would be removed by the particulate control device. The lead emission limit will initially be set at 0.020 pounds per ton of MSW charged into the incinerator. If the initial compliance tests show that the lead emissions are greater than or equal to 0.0080 pounds per ton, the lead emission limit of 0.020 pounds per ton will remain in effect. If the initial compliance tests show that the lead emissions are less than 0.0080 pounds per ton, the lead emission limit will be reduced to 0.010 pounds per ton. This level of control is judged to be BACT.

Since there are several secondary lead reclamation plants in the Tampa area, there is an economic incentive to recycle lead containing materials. The majority of lead emissions from an incinerator are expected to originate from solder joints in discarded electronic devices. The amount of lead emitted is not considered to have a significant impact upon the environment.

During combustion of municipal solid waste, NO_x is formed in high temperature zones in and around the furnace flame by the oxidation of atmospheric nitrogen and nitrogen in the waste. The two primary variables that affect the formation of NO_x are the temperature and the concentration of oxygen. Techniques such as the method of fuel firing to provide correct distribution of combustion air between overfire and underfire air, exhaust gas recirculation, and decreased heat release rates have been used to reduce NO_x emissions. A few add-on control techniques such as catalytic reduction with ammonia and thermal de-NO_x are still experimental, and are not considered to be demonstrated technology for the proposed project.

The proposed units will use proprietary grate and combustion controls to limit NO_x emissions at 3.0 pounds per ton of MSW charged. This level of control is judged to represent BACT.

Carbon monoxide is a product of incomplete combustion where there is insufficient air. Incomplete combustion will also result in the emissions of solid carbon particulates in the form of smoke or soot and unburned and/or partially oxidized hydrocarbons. Incomplete combustion results in the loss of heat energy to the boiler. The department agrees with the applicant that BACT is the grate and combustion control system to insure sufficient mixing of the MSW and air so that the emission of products of incomplete combustion is minimized. The proposed CO emission rate is 1.8 pounds per ton. This level of control is judged to represent BACT.

Furthermore, CO has a calorific value of 4347 Btu/lb and when discharged to the atmosphere represents lost heat energy. Since heat energy is used to produce the steam which drives the generator to produce electric power, there is a strong economic incentive to minimize CO emissions.

Particulate matter emissions will be controlled by an electrostatic precipitator (ESP). Each of the three proposed boilers will be equipped with its own ESP which will be efficient to 0.021 grains per dry standard cubic foot corrected to 12% CO₂ at the outlet. At this emission rate, particulate matter emissions for the facility will be approximately 96 tons per year.

VOC emissions, like carbon monoxide emissions, result from incomplete oxidation of carbon compounds. Control of CO and VOC emissions can be mutually supportive events.

The applicant indicates that sulfuric acid mist and fluorides will be emitted by the proposed facility. The applicant estimates that sulfuric acid mist will be emitted at a rate of 0.0768 pounds per ton of fuel combusted. This equates to a rate of 3.8 pounds per hour or 16.8 tons per year. The significant emission rate for sulfuric acid mist is 7.0 tons per year. Emissions of fluoride are estimated at 0.06 pounds per ton of fuel combusted. At this emission rate, fluorides would be emitted at a rate of 3.0 pounds per hour or 13.1 tons per year. The significant emission rate for fluoride is 3.0 tons per year. Control of these acid gas emissions would be obtained by a scrubber. However, at the level of these acid gas emissions, the addition of a scrubber for acid gas control would be uneconomical. No control is judged to represent BACT. In addition, BACT for the control of acid gas emissions is that the initial design of the proposed facility include provisions for

the possible future installation of a wet or dry flue gas scrubber system, if deemed necessary.

b. NSPS and Florida SIP Limit Analysis

These two regulations dictate similar emission limits using slightly different units. The proposed particulate emission limit of 0.021 gr/dscf is far below either of these limits.

V. Air Quality Analyses

The air quality impact of the proposed emissions has been analyzed. Atmospheric dispersion modeling has been completed and used in conjunction with an analysis of existing air quality data to determine maximum ground-level ambient concentrations of the pollutants subject to BACT. Based on these analyses, the department has reasonable assurance that the proposed solid waste recovery facility in Hillsborough County, subject to these BACT emission limitations, will not cause or contribute to a violation of any PSD increment or ambient air quality standard.

a. Modeling Methodology

The EPA-approved Industrial Source Complex Short-term (ISCST) dispersion model was used in the air quality impact analysis. This model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area and volume sources. The ISCST model allows for the separation of sources and several other features, such as the inclusion of building wake downwash. This model was used in both screening and refined analyses.

All modeling was completed assuming the operation of four incinerators. Since the current plans are for the construction of only three incinerators, the modeling results represent a slightly conservative estimate of ambient concentrations.

Screening analyses were initially run using 26 prescribed meteorological conditions with the stack and emission data of the proposed ERF. These runs determined the worst-case boiler operating condition, identified those pollutants emitted from the ERF with a potential for significant impact, and established receptor locations for the more refined modeling. The results of these analyses indicated that a 110 percent boiler load condition (440 tons per day throughput) yielded the greatest air quality impact with the maximum ground-level concentrations occurring approximately 400 meters from the stack.

The refined modeling analysis consisted of running ISCST using five years of sequential hourly meteorological data. The surface and upper air meteorological data used were National Weather Service data collected at Tampa, Florida during the period 1970-1974. Since five years of data were used, the highest, second-high short-term predicted concentrations are compared with the appropriate ambient standard or PSD increment.

An initial set of refined runs was made with emissions only from the proposed ERF. The significant impact area for SO₂ was then determined. This area is defined as the area enclosed by a circle whose radius is equal to the farthest distance from the facility in which a significant impact occurs. A significant impact is defined as 25 ug/m³ for a 3-hour average, 5 ug/m³ for a 24-hour average, and 1 ug/m³ for an annual average. For this project the significant impact area extends to a distance of approximately one kilometer. Beyond this distance the ERF is assumed to have an insignificant SO₂ impact.

Modelled emission rates for some pollutants were higher than the BACT limits, which produced conservative estimates of ambient impacts. For a comparison of these rates, Table V-2 should be compared to the BACT emission rates in Section IV.a.

Other major SO₂ sources within about 30 kilometers of the proposed facility were modeled for impact within the significant impact area. The impacts of the other emitted pollutants were evaluated using emissions from the ERF only. Total ambient air quality impacts were based on the modeled impacts plus the monitored "background" concentrations.

The stack parameters and emission rates used in evaluating the ambient impacts are contained in Table V-1 and Table V-2, respectively. Copies of some of the critical model outputs and a description of the refined modeling analysis are attached to this determination in Appendix 1. Complete modeling printouts are available at the DER offices in Tallahassee, Florida.

b. Analysis of Existing Air Quality

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD review. In general, one year of quality assured data using an EPA-reference, or the equivalent, monitor must be submitted. Sometimes less than one year of data, but no less than four months, may be accepted when department approval is given.

Table V-1
Hillsborough County Resource Recovery Project
Source Parameters

Source	UTM-E (km)	UTM-N (km)	SO ₂ (g/s)	Stack Height (m)	Temp. (K)	Exit Vel. (m/s)	Stack Dia. (m)
<u>PSD Sources</u>							
Hillsborough Co. RRF	368.2	3092.7	29.6	67.0	494	16.9	3.50
Pinellas RRF 1-3	335.2	3084.1	31.5	49.1	505	26.8	2.37
McKay Bay RRF	360.0	3091.9	21.4	45.7	500	21.3	1.91
TECO Big Bend	361.9	3075.0	8598	149.4	426	15.6	7.00
<u>NAAQS Sources</u>							
FPC Bartow	342.4	3082.7	722.2	91.4	408	44.0	3.35
FPC Higgins	336.5	3098.5	286.7	53.0	422	10.4	3.81
FPC Anclote #1	324.9	3119.0	1631.9	152.1	416	50.0	3.66
FPC Anclote #2	324.9	3119.0	816.0	152.1	416	28.3	3.66
TECO Hooker Pt. #1)	358.0	3091.0	41.30	85.4	402	18.2	3.40
TECO Hooker Pt. #2)	358.0	3091.0	41.30	85.4	402	18.2	3.40
TECO Hooker Pt. #3)	358.0	3091.0	37.00	85.4	397	11.5	3.70
TECO Hooker Pt. #4)	358.0	3091.0	57.00	85.4	397	11.5	3.70
TECO Hooker Pt. #5)	358.0	3091.0	84.00	85.4	402	18.2	3.40
TECO Hooker Pt. #6)	358.0	3091.0	107.00	85.4	436	17.9	2.90
TECO Gannon #1	360.0	3087.5	282.5	93.3	438	22.5	3.70
TECO Gannon #2	360.0	3087.5	282.5	93.3	438	32.4	3.10
TECO Gannon #3	360.0	3087.5	321.4	93.3	427	35.4	3.20
TECO Gannon #4	360.0	3087.5	421.6	93.3	443	24.6	2.90
TECO Gannon #5	360.0	3087.5	513.4	93.3	415	20.6	4.50
TECO Gannon #6			853.6	93.3	415	23.7	5.40
General Portland	358.0	3090.6	349	44.3	473	6.6	4.72
Gardinier	363.4	3082.4	473.3	29.4	333	9.1	2.10
Gardinier	363.4	3082.4	-210.26	36.5	344	11.8	2.00

Table V-1 (cont.)

Source	UTM-E (km)	UTM-E (km)	SO ₂ (g/s)	Stack Height (m)	Temp. (K)	Exit Vel. (m/s)	Stack Dia. (m)
<u>AMAX (Pt. No.)</u>	393.8	3096.3					
			12.0	30.5	335.1	12.0	1.37
01			3.3	24.4	315.8	8.9	1.67
02			17.6	46.3	308.6	11.0	1.76
03			29.0	45.7	315.6	15.9	1.76
05			2.8	6.1	550.2	15.3	0.40
19			1.4	3.4	605.2	20.2	0.37
20			27.1	46.3	298.0	13.1	1.76
26 - 28			2.1	10.6	605.2	15.3	0.36
29							
<u>CF Industries (Pt. No.)</u>	380.0	3115.7					
01			6.1	7.5	560.0	19.7	1.07
10			6.2	28.7	316.3	7.2	3.05
11			9.2	54.9	321.9	12.6	2.79
12			13.7	54.9	315.2	9.8	2.79
13			13.7	54.9	324.7	10.5	2.79
<u>Chloride Metals (Pt. No.)</u>	361.8	3008.3					
01			10.1	32.2	346.7	27.8	0.58
04			10.1	29.9	363.0	14.4	0.61
Columbia Paving	366.7	3077.8	3.7	12.2	339.7	22.3	1.37

Table V-1 (cont.)

Source	UTM-E (km)	UTM-E (km)	SO ₂ (g/s)	Stack Height (m)	Temp. (K)	Exit Vel. (m/s)	Stack Dia. (m)
Columbus Company	361.9	3077.8	4.8	12.6	449.7	20.0	1.24
Couch Construction	364.3	3098.1	3.3	10.4	390.8	17.2	1.41
Delta Asphalt	372.1	3105.4	4.8	8.4	381.3	20.6	1.17
Gulf Coast Lead co.	363.9	3093.8	47.2	29.6	347.4	24.9	0.62
IMC Port Sutton	360.1	3087.5	41.5	19.8	338.6	10.5	2.41
Thatcher Glass (Pt. No.)	361.2	3103.3	2.6	41.1	694.1	9.4	1.52
Furnace No. 1			2.6	41.1	656.9	11.4	1.52
Furnace No. 2							
Nitram	363.2	3089.0	3.1	27.4	505.2	10.8	1.37
National Gypsum (Pt. No.)	347.3	3082.7					
Dryer No. 1/Zone 1			0.66	12.5	388.6	8.5	1.07
Zone 2			0.66	12.5	424.7	9.1	0.91
Zone 3			0.66	12.5	330.2	9.1	0.91
Dryer No. 2/Zones 1&2			1.0	10.1	421.9	20.7	0.76
Zone 3			0.5	10.1	408.0	10.4	0.76
Zone 4			0.5	11.3	394.1	25.9	0.91

Table V-2
Hillsborough County Resource Recovery Project
Maximum Hourly Emission Rates Used
in Modeling

<u>Pollutant</u>	<u>lb/ton</u>	Emission Rates (1) <u>g/s</u>
Particulate Matter	0.38	3.5
Sulfur Dioxide	3.2 ⁽²⁾	29.6
Carbon Monoxide	1.8	16.6
Nitrogen Oxides	3.0	27.7
Lead	0.02	0.185
Hydrocarbons (non-methane)	0.2	1.85
Mercury	0.0052	0.048
Beryllium	0.0000131	0.000121
Fluorides	0.06	0.554
Sulfur Acid Mist	0.0768	0.710
Hydrogen Chloride	4.0	37.9

(1) Based on a throughput of 110 percent of design capacity and the operation of four incinerators

(2) 3.2 lb/ton was used for 24-hour and annual average modeling and 8.5 lb/ton was used for 3-hour average modeling

An exemption to the monitoring requirement can be obtained if the maximum air quality impact, as determined through air quality modeling, is less than a pollutant-specific de minimus concentration. In addition, if current monitoring data already exist and these data are representative of the proposed source area, then at the discretion of the Department these data may be used. Such representative data must meet criteria for location, quality, and currentness outlined in EPA publication 450/4-80-012, Ambient Monitoring Guidelines for Prevention of Significant Deterioration.

The predicted maximum air quality impacts of the proposed ERF for the eight pollutants subject to PSD review are given in Table V-3 along with the monitoring de minimus levels. From this table it is seen that SO₂, lead, and fluorides have maximum predicted air impacts greater than the de minimus levels and are thus subject to preconstruction monitoring requirements. Sufficient data in the area, however, exists for SO₂ and lead. The department did not require additional monitoring for these pollutants, since the existing data comply with the requirements of EPA 450/4-80-012. Although fluorides are subject to the monitoring requirements, no EPA-approved method currently exists to measure the ambient concentration of this pollutant. Also, requirement for monitoring of noncriteria pollutants is at the discretion of the Department.

Table V-4 shows the monitored ambient air quality levels for the most recent year (1983) for all the criteria pollutants, including the required data for SO₂ and lead. These data were collected from existing monitors in Hillsborough County.

c. PSD Increment Analysis

1. Class II Area

The proposed Hillsborough County ERF is to be located in an area designated as a Class II attainment area for the pollutant SO₂. Because the proposed facility is to be located in an area designated as nonattainment for PM, a PSD increment analysis is required for SO₂ only.

The PSD increments represent the amount that new sources in the area may increase ambient ground-level concentrations of SO₂ and PM. At no time, however, can the increased loading of these pollutants cause or contribute to a violation of the ambient air quality standards.

All SO₂ emission increases from sources constructed or modified after December 1977 will consume PSD increment.

Table V-3
Maximum Air Quality Impacts Of The ERF
For Comparison To The De Minimus Ambient Levels

<u>Pollutant</u>	<u>Maximum Modeled Concentration (1)(ug/m³)</u>	<u>De Minimus Ambient Impact Level (ug/m³)</u>
SO ₂ (24-hour)	21.6	13
CO (8-hour)	16.3	575
NO ₂ (Annual)	1.0	14
Lead (24-hour)	0.14	0.1
Mercury (24-hour)	0.035	0.25
Beryllium (24-hour)	0.000088	0.00050
Fluorides (24-hour)	0.405	0.25
Sulfuric Acid Mist	0.52	-
PM (2)	2.6	10

(1) Highest second-high concentration assuming four incinerators

(2) PM included for informational purposes.

Table V-4

Hillsborough County 1983 Monitoring Data in the Vicinity of the Proposed
Resource Recovery Facility

Pollutant	Site	Location with Respect to the Proposed Facility		Averaging Time	Concentration Category	Concentration (ug/m ³)
		Direction	Distance (km)			
SO ₂	4360-052	278°	9.9	3-hour	Second-high	493
				24-hour	Second-high	86
				Annual	Highest	16
NO ₂	4360-052	278°	9.9	Annual	Highest	35
CO	4360-052	278°	9.9	1-hour	Second-high	12,600
				8-hour	Second-high	5,700
Lead	1800-082	285°	3.3	Calendar quarter	Highest	0.8
PM(1)	1800-082	285°	3.3	24-hour	Second-high	115
				Annual	Highest	54
O ₃ (1)	4360-035	259°	11.5	1-hour	Second Daily High	281

(1) Nonattainment Pollutants

In addition, all SO₂ emission increases associated with the construction or modification of major sources which occurred after January 6, 1975, will consume increment. For the proposed project all emissions from the ERF consume increment. Several other sources in the area have been identified by the applicant as also consuming PSD increment and have been included in the analysis.

The Department has identified four other sources as having the potential to consume additional PSD increment for SO₂. These sources are the Columbus Company, Couch Construction Company, Weyerhaeuser Company, and Scrapall Company. The first two were included in the modeling for determination of total impact but not for the determination of increment consumption. The latter two were not included in any modeling. A review of these sources indicated that only Columbus Company and Couch Company could potentially have a significant impact on increment consumption in the area of the proposed project. These sources will not interact with the increment consuming sources already modeled by the consultant.

It should be noted that the major increment consuming source identified by the applicant is the TECO Big Bend power plant. All units at this plant were modeled as increment consuming. In actuality only Unit 4 consumes increment and these emissions are largely offset by emission decreases (increment expansion) from Units 1, 2 and 3. As such, increment consumption is greatly overestimated.

Atmospheric dispersion modeling was performed taking into account only those new sources which consume PSD increment. The results of this modeling are summarized in Table V-5.

2. Class I Areas

A Class I area increment analysis is required for the Chassahowitzka National Wilderness Area located 79.6 kilometers to the north-northwest. The impact of the proposed ERF on this Class I area was determined. Although the distance to the Class I areas is greater than 50 kilometers (the distance to which the models are generally considered valid) the results indicate an extremely small (insignificant) impact on this area.

Table V-5

Comparison of New Source Impacts
with PSD Increments

Pollutant and Averaging Time	PSD Class II Increment ($\mu\text{g}/\text{m}^3$)	Predicted Increased Concentration ($\mu\text{g}/\text{m}^3$)	Increment Consumed (%)	PSD Class I Increment ($\mu\text{g}/\text{m}^3$)	Predicted Increased Concentration ($\mu\text{g}/\text{m}^3$)
SO ₂					
3-hour	512	465	91	25	<1
24-hour	91	87	96	5	<1
Annual	20	5	25	2	<<1

d. AAQS Analysis

Given existing air quality in the area of the proposed Hillsborough County ERF, emissions from the new source are not expected to cause or contribute to a violation of an AAQS. The results of the AAQS analysis are contained in Table V-6.

Of the pollutants subject to PSD review only the criteria pollutants SO₂, CO, NO₂, and lead have an AAQS to compare with. All sources listed in Table V-1 were modeled to determine the maximum ground-level impacts for SO₂ within the area of significant impact. For CO, NO_x, and lead only the proposed ERF was modeled to determine the maximum ground-level concentrations.

The total impact on ambient air is obtained by adding a "background" concentration to the maximum modeled concentration. This "background" concentration takes into account all sources of the particular pollutant in question that were not explicitly modeled. A conservative estimate of these "background" concentrations is given by the second highest monitored concentration listed in Table V-4. This is a conservative estimate because sources used in the modeling may have contributed to the monitored value and hence contribute doubly to the total impact.

VI. Additional Impacts Analysis

a. Impacts on Soils and Vegetation

The maximum ground-level concentrations predicted to occur for the criteria pollutants as a result of the proposed project in conjunction with all other sources, including a background concentration, will be below all applicable AAQS including the secondary standards designed to protect public welfare-related values. As such these pollutants are not expected to have a harmful impact on soils and vegetation.

The applicant has additionally addressed the impacts of the noncriteria pollutants. No soils or species of vegetation near the proposed project are known to be sensitive to these pollutants at the concentrations predicted to occur. These pollutants include sulfuric acid mist, fluorides, mercury, beryllium, and hydrochloric acid. Hydrochloric acid (HCL) is not one of the PSD review pollutants but was included at the Department's request because of its large emissions.

Table V-6

Comparison of Total Impacts with
Ambient Air Quality Standards

Pollutant and Averaging Time	Maximum Impact Project	Maximum Impacts All Sources (ug/m ³)	Existing Background (ug/m ³)	Maximum Total Impact (ug/m ³)	National AAQS (ug/m ³)
SO ₂					
3-hour	106	519	493	1012	1300
24-hour	22	163	86	249	365
Annual	1	9	16	25	80
CO					
1-hour	32	-	12600	12632	40,000
8-hour	16	-	5700	5716	10,000
NO ₂					
Annual	1	-	35	36	100
Lead					
Quarterly	0.14 ¹	-	0.8	0.9	1.5

¹ The maximum quarterly average was conservatively estimated by using the maximum 24 hour average

b. Impact on Visibility

A level-1 visibility screening analysis was performed to determine any impact on the Chassahowitzka National Wilderness Class I area. The analysis showed that there was no potential for an adverse impact on visibility in this area due to emission from the proposed project.

c. Acid Rain Impact

The increased emissions of SO_2 and NO_x , precursors to possible acid formation and subsequent acidic rain, from the proposed project are extremely small in comparison with the emissions of these pollutants from nearby power plants. Thus, no significant adverse impact on the acidity of rainfall is expected as a result of this project.

d. Growth-Related Air Quality Impacts

The construction and operation of the proposed source will have a minor positive net effect on industrial and commercial development. The source will promote development by providing for solid waste disposal, and thereby be an integral part of the plans for development within Hillsborough County. On a regional basis this effect is not expected to be significant. The project is not expected to significantly change employment, population, housing, or commercial/industrial development in the area to the extent that an air quality impact will result.

e. GEP Stack Height Determination

Good engineering practice (GEP) stack height means the greater of: (1) 65 meters; or (2) the maximum nearby building height plus 1.5 times the building height or width, whichever is less. For the proposed project the building height is 42.7 meters above ground level and the projected width is 56.4 meters. Thus definition (2) above leads to a GEP stack height of 106.8 meters.

The proposed stack height is 67 meters. This is less than the GEP height. The applicant has addressed the possible increased ground-level concentrations (as a result of aerodynamic effects of the nearby building) by including a downwash mechanism in the modeling.

VII. Nonattainment Review

EPA announced approval of Florida's new source review program for major sources in designated nonattainment areas on March 18, 1980 (45 FR 17140). Subsequently, in 1985, EPA discovered that the

Florida Power Plant Siting Act supercedes in part the nonattainment new source review regulations under Florida law. Consequently, the Florida SIP is deficient with respect to electrical power plants. EPA plans to issue, in the near future, a federal register notice clarifying that two sets of nonattainment regulations will apply:

(1) For sources located in designated nonattainment areas, EPA's construction ban (40 CFR 52.24) applies to major sources and major modifications, and

(2) For sources locating in designated attainment or unclassifiable areas, EPA's Interpretative Ruling (40 CFR 51.18 Appendix S) will apply to major sources and major modifications.

The proposed source will be located in an area designated nonattainment for particulate matter and ozone, but is not a major source for either pollutant, and thus will not be subject to the construction ban. The source will be located 43.5 kilometers from an SO₂ nonattainment area and is a major source for SO₂. Under the Interpretative Ruling, the proposed source would be subject to certain more stringent requirements if the impact of its SO₂ emissions on the nearby nonattainment area exceeded 1 ug/m³ annual average, 5 ug/m³ 24-hour average, or 25 ug/m³ 3-hour average. The modeling analysis shows the impact of the proposed source to be less than each of those levels, so the Interpretative Ruling will not apply.

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE
PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 U.S.C. §7470 et. seq., and the regulations promulgated thereunder at 40 CFR §52.21, as amended at 45 Fed. Reg. 52676, 52735-41 (August 7, 1980),

Hillsborough County, Florida

is, as of the effective date of this permit (PSD-FL-104)
authorized to construct a stationary source at the following
location:

Two miles east of Tampa on a site owned by the County on Faulkenburg Road, 0.6 miles north of State Road 60.

Upon completion of authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Specific Conditions (Part I) and General Conditions (Part II)

This permit is hereby issued on _____ and shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1).

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of

Date Signed _____

Regional Administrator

PART I

Specific Conditions

1. Emission Limitations

a. Stack emissions from each unit shall not exceed the following:

- (1) Particulate matter: 0.021 grains per dry standard cubic foot corrected to 12% CO₂ (gr/dscf-12%) or 7.0 pounds per hour per unit, whichever is more restrictive.
- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity except that 20% opacity may be allowed for one six-minute period (average of 24 consecutive observations recorded at 15-second intervals) in any one hour. Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by EPA for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited. Opacity of other emission points at the plant shall not exceed 5%.

- (3) VOC: 0.01 gr/dscf-12%, or 0.2 lb/ton, whichever is more restrictive
- (4) SO₂: 0.17 gr/dscf-12% or 3.2 lb/ton, whichever is more restrictive, 24-hour average, 0.45 gr/dscf-12% or 8.5 lb/ton, whichever is more restrictive, 3-hour average
- (5) Nitrogen Oxides: 0.16 gr/dscf-12%, or 3.0 lb/ton, whichever is more restrictive
- (6) Carbon Monoxide: 0.093 gr/dscf-12%, or 1.8 lb/ton, whichever is more restrictive.

- (7) Lead: 0.00104 gr/dscf-12%, or 0.020 lb/ton, whichever is more restrictive.
- (8) Fluorides: 0.0031 gr/dscf-12%, or 0.060 lb/ton, whichever is more restrictive.
- (9) Sulfuric Acid Mist: 0.0040 gr/dscf-12%, or 0.077 lb/ton, whichever is more restrictive.
- (10) Beryllium: 6.8×10^{-7} gr/dscf-12%, or 1.3×10^{-5} lb/ton, whichever is more restrictive.
- (11) Each of the emission limits in conditions (1) and (3) through (10) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (3) through (10) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.
- (12) Mercury: 2200 grams/day
- (13) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. Additionally, all portions of the proposed facility including the ash handling facility which have the potential for fugitive emissions will be enclosed. Also those areas which have to be open for operational purposes, e.g., tipping floor of the refuse bunker while trucks are entering and leaving, will be under negative air pressure.
- (14) Each of the three units is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards

(NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.

- (15) Only natural gas will be used as an auxiliary fuel.

b. Compliance Tests

- (1) Compliance tests for particulate matter, SO₂, nitrogen oxides, CO, VOC, sulfuric acid mist, fluorides, mercury and beryllium shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f), except that an annual test will be conducted for particulate matter. Compliance tests for opacity will be conducted simultaneously during each compliance test run for particulate matter.

Compliance tests shall be conducted for such time and under such conditions as specified by EPA prior to the compliance test. These conditions will be specified by EPA upon notification of performance tests as required by General Condition 1. The permittee shall make available to EPA such records as may be necessary to determine the conditions of the performance tests.

- (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:
- a. Method 1 for selection of sample site and sample traverses
 - b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.

- e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 6 for concentration of SO₂. Two samples, taken at approximately 30 minute intervals, shall constitute one test run.
 - h. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.
 - i. Method 8 for determination of sulfuric acid mist concentration and associated moisture content. One sample shall constitute one test run.
 - j. Method 10 (continuous) for determination of CO concentrations. One sample constitutes one test run.
 - k. Method 12 for determination of lead concentration and associated moisture content. One sample constitutes one test run.
 - l. Method 25 for determination of volatile organic compounds (VOC) concentration. One sample shall constitute one test run.
 - m. Method 13A or 13B for determination of fluoride concentrations and associated moisture content. One sample shall constitute one test run.
 - n. Method 101A for determination of mercury emission rate and associated moisture content. One sample shall constitute one test run.
 - o. Method 104 for determination of beryllium emission rate and associated moisture content. One sample shall constitute one test run.
- (3) The stack tests shall be performed at $\pm 10\%$ of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.

2. The height of the boiler exhaust stack shall be 220 feet above ground level at the base of the stack.
3. The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.
4. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.
5. The permittee must submit to EPA and DER within fifteen (15) days after it becomes available to the County, copies of technical data pertaining to the incinerator boiler design, to the electrostatic precipitator design, and to the fuel mix that can be used to evaluate compliance of the facility with the preceeding emission limitations.
6. Grease, scum, grit screenings or sewage sludge shall not be charged into the solid waste to energy facility boilers.
7. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to limit particulate emissions to no more than 0.021 grains per dscf corrected to 12% CO₂.

8. Stack Monitoring Program

The permittee shall install and operate continuous monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Rule 17-2.710, FAC, 40 CFR Part 60, Subparts A and D, Sections 60.13 and 60.45 respectively, except that emission rates shall be calculated in units consistent with emission limits in this permit. The conversion procedure shall be approved by EPA.

9. Reporting

- a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office, the Hillsborough County Environmental Protection Commission (HCEPC) and EPA Region IV.
- b. Stack monitoring shall be reported to HCEPC, the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

10. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.

11. Addresses for submitting reports are:

a. EPA - Region IV

Chief, Air Compliance Branch
U.S. Environmental Protection Agency
345 Courtland St.
Atlanta, GA 30365

b. DER

Chief, Compliance and Ambient Monitoring
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

c. Southwest District Office of DER

District Manager
Department of Environmental Regulation
7601 Highway 301 N.
Tampa, FL 33610

d. HCEPC

Chief, Air Group
Hillsborough County Environmental
Protection Commission
1900 9th Ave.
Tampa, FL 33605

12. The facility shall provide space for the future installation, if necessary, of a wet or dry flue gas scrubber.

PART II

General Conditions

1. The permittee shall comply with the notification and record-keeping requirements codified at 40 CFR Part 60, Subpart A, § 60.7.
2. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
3. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide EPA with the following information in writing within five (5) days of such conditions:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission, and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of the aforementioned information does not constitute a waiver of the emission limitations contained within this permit.

4. Any proposed change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that would result in new or increased emissions or ambient air quality impact must be reported to EPA. If appropriate, modifications to the permit may then be made by EPA to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein. Any construction or operation of the source in material variance with the application shall be considered a violation of this permit.

5. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit and EPA of the change in control of ownership within 30 days.
6. The permittee shall allow representatives of the state and local environmental control agency or representatives of the EPA upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Clean Air Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emissions of pollutants; and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
7. The conditions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

- p.2-51 Solid Waste Disposal. Figure 2.14 shows the location of existing and proposed solid waste management facilities within the County. Currently, all of the solid waste generated in Hillsborough County, including that generated by the three cities, is disposed of at the County's Hillsborough Heights landfill. The monthly solid waste quantities received at the Hillsborough Heights Sanitary Landfill from May 1981 to April 1983 are shown in Table 2.21. Approximately 2,000 tons per day (six days per week) of solid waste are disposed of at this site, of which about 750 tons per day (six days per week) is delivered by the City of Tampa.
- p.3-5 The Board of County Commissioners has officially stated that the County will own the project. The contractor will provide a full-service arrangement, including design, construction, acceptance testing, and 20 years of continuous operation, for a "mass-burn" type resource recovery facility with a continuous design rated capacity of 1,200 tons per day using three combustion/steam generation units each with a continuous design rated capacity of 400 tons per day. Additionally, the layout of the project will allow the addition of a fourth combustion/steam generation unit. Initial project construction will include a tipping area and refuse storage pit sized to handle 1,600 tons per day (continuous design rated capacity) and the stack shall have four (4) flues.
- p.3-6 Since the proposed facility will utilize mass-burn technology, there will be no preprocessing of wastes at the facility prior to combustion (except for some limited size reduction of oversized items.) A schematic diagram of a typical resource recovery facility is presented in Figure 3.1. MSW will be truck-delivered to the facility and ash residue removed by the same mode of transport. Under a 1600 tpd configuration, four 400 tpd units would be used in the facility.
- p.3-7 As noted above, while the proposed facility will have a maximum design rated capacity of 1600 tpd, its initial design rated capacity will be about 1200 tpd (comprised of three 400 tpd units). Each boiler unit operates independently from the others. It will, therefore, be possible to routinely shut down one unit for periods of maintenance and inspection.
- p.3-14 The pit shall be sized for minimum storage capacity of three days of solid waste; i.e. 4,800 tons of solid at a density of 450 pounds per cubic yard.

As noted previously, the proposed energy recovery facility is a new facility to be located in Hillsborough County. At ultimate size, the facility is planned would contain four boilers each with a rated capacity of 400 tpd of MSW for a total of 1600 tod.

p.13 The contractor will provide a full-service arrangement, including design, construction, acceptance testing, and 20 years of continuous operation, for a "mass-burn" type resource recovery facility with a continuous design rated capacity of 1,200 tons per day using three combustion/steam generation units each with a continuous design rated capacity of 400 tons per day. Additionally, the layout of the project will unit. Initial projection construction shall include a tipping area and refuse storage pit sized to handle 1,600 tons per day (continuous design rated capacity) and the stack shall have four (4) flues.

p.14 Once the site is certified by the state, no other state permits will be required for the project. Although the rate continuous design capacity of the project will be 1,200 tons per day (generating about 29 megawatts), site certification is being sought for an ultimate continuous design rated capacity of 1,600 tons per day (generated about 39 megawatts) since it is anticipated that the County may expand the project in the future.

C. Costs of pollution control system(s): (Note: show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Electrostatic Precipitators (4) \$4,500.00 total

p.6-12 Total Weight Incinerated (lbs/hr) 133,333. Calculations by GPL 6/13/94 lbs/hr. 400 Tons/day/unit. Stack Diamter: flues, each 5'-9' Diam.

Suppl. Section V: Supplemental Requirements
Total process input rate at design capacity (i.e. name-plate rating) is 1600 TPS, 4 units each at 400 TPD. Residue amount will be 29,000. lb/hr (dry basis) and is derived as follows:

$$\begin{array}{rcl} \text{Inert} & = & (133,333 \text{ wet lb/feed } (0.7265 \text{ dry lb}) (0.3567 \text{ lb. Carbon} \\ \text{Material} & & \text{hr} \quad \text{wet lb} \quad \text{dry lb} \\ & & \underline{28,100 \text{ dry lb inert}} \\ & & \text{hr} \end{array}$$

Emission estimates are contained in the Prevention of Significant Deterioration (PSD) Permit Application

p.3-3 ...using 1,200 tons per day (tpd) of solid waste as fuel. However, certification for an ultimate site capacity of about 39 megawatts, capable

of processing 1,600 tons of solid waste per day, is being sought in anticipation of future solid waste disposal requirements.

Conceptual schematic diagram of the recovery facility is presented in Figure 3-2. Truck transport will be used to deliver MSW to the facility and to remove ash residue from the facility. Under a 1600 tpd configuration, four 400-tpd units would be used in the facility.

- p.3-5 Bottom ash from the furnace and flyash from the precipitator will be mixed prior to removal from the facility. Ash will comprise 10 percent of the volume and 25 percent of the weight of the MSW processed by the facility. The ash will be quenched with water to about 30 percent moisture prior to transport to a landfill.

As noted above, while the proposed facility will have a maximum design rated capacity of 1600 tpd, its initial throughput will be about 1200 tpd (comprised of three 400 tpd units). Each boiler unit operates independently from the others. It would, therefore, be possible to routinely shut down one unit for periods of maintenance and inspection

- p.3-9 The resource recovery facility will consist of four boilers each capable of firing 400 tpd of reference waste (see Section 3.3 of Volume I) at its maximum continuous rating (MCR). This firing rate will be adjusted as the waste quality changes, i.e. changes in the higher heating value (HHV). This is because one of the objectives of plant operation is to maintain the heat load to the boiler by maintaining the heat release on the grate. When the HHV is low (higher moisture and ash fractions, lower combustibles fraction) more waste will be processed, up to 440 tpd per boiler. Likewise, when the HHV is high, less waste will be processed.

The maximum load condition with a heating value of 4,000 Btu/lb resulted in the highest pollutant impacts and therefore this condition is used throughout the modeling assessment (see Section 7.1). This provides for a conservative analysis as the facility is expected to operate, over the long-term, at its maximum continuous rating (MCR) of 400 TPD of reference solid waste subject to an availability of 85 percent.

- p.4-2 Emission Factors for Florida Resource Recovery Facilities
Pounds per ton of MSW

<u>Hillsborough Proposed</u>	
<u>Particular matter</u>	<u>0.48</u>
<u>Sulfur dioxide</u>	<u>2.5</u>
<u>Nitrogen oxides</u>	<u>3.0</u>

Carbon monoxide	1.8
Hydrocarbons	1.2
Lead	0.048
Mercury	0.0052
Beryllium	13.1 x 10 ⁻⁶
Fluorides	0.06
Sulfuric acid	7.68 x 10 ⁻²
Hydrogen chloride	4.0

p.6-1 Best Available Control Technology/Lowest Achievable Emission Rate Analysis

It is assumed for this analysis that the facility will operate at 100% availability at the maximum firing rate of 110% of the nameplate rating (equal to 1760 TPD)

p.6-2 The stack parameters that were used in the modeling exercise simulated worst-case conditions. That is, recently cleaned boilers operating at maximum load conditions (1760 tpd or 110 percent of the nameplate rating) and firing a waste with a low HHV (4000 BTU/lb).

Although worst-case conditions should be used to calculate maximum short-term pollutant concentrations, annual average conditions would be used to calculate maximum long-term concentrations. However, to minimize the computer time involved with the modeling activities, all impacts, both short and long-term were predicted based on worst-case stack gas exit conditions. This would therefore over predict the long-term concentrations providing a degree of conservatism. Also, this assumption of worst-case conditions holds true even under conditions of changing waste throughput due to variations in waste quality (i.e. HHV).

Worst-case conditions at maximum load corresponds to firing 1760 tpd solid waste with an HHV of 4,000 BTU/lb and a stack gas exit temperature of 430 deg. F. (ESP Case).

p.7-3 The resource recovery facility will consist of four boilers each capable of firing 400 tons per day (tpd) of reference solid waste. The boilers will typically to be run above 100% of the maximum continuous rate (MCR) but operations at 110% of the MCR caused the greatest air quality impacts and was, therefore, used throughout the air quality analysis (See Section 3.0).

p.7-6 Emission Rates for the Proposed Facility

*Emission rates based on a throughput equal to 110% of design capacity.

Changes in Paragraph 2, page 1 of the permit:

For the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two times east of Tampa on the county's Faulkenburg Road site.

This permit is issued under the provisions of Chapter 403, and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the County's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 km E and 3092.7 km N.

* 1-10
p.2-10 This permit is valid only for the specific processes and operations applied for an indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

p.6-10 Nitrogen Oxides: 9.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive.
The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e. dscf per ton of refuse fired, are different than projected by the applicant, DER may, at its discretion, determine compliance based upon the lb/ton limits.

p.8-10 The boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.

p.3 Page 8, paragraph 3, Modeling Methodology. It should be noted that the prior modeling for the facility utilized a conservative approach. The stack parameters and emission rates were based on a maximum facility

capacity of 1,760 tons per day and 100% facility availability. As currently constructed, however, the plant will normally handle approximately 1200 tons per day. In addition, it is generally assumed that resource recovery facilities will only be available approximately 85% of the time.

- p.2 Under Section IV, captioned 'BACT Determination,' OMSH would propose changing the second sentence of the first paragraph to read as follows:

The ERF is designed to burn up to 1200 tons per day (TPD) of refuse at a heating value of 4500 BTU's per pound, which amount will increase or decrease, respectively, based upon lower or higher heating values, in each case, resulting in an electrical generating capacity of 29 megawatts.

- p.2 The proposed project will be an energy recovery facility boiler which could be used up to 1200 tons per day (TPD) of refuse as fuel.

- p.3 The applicant is proposing the construction of three 400 TPD mass burn technology incinerators for the processing of up to 1200 TPD of municipal solid waste.

The maximum annual emissions from all three units for all regulated pollutants have been estimated by the applicant. These emission rates, and the PSD significant emission rates, are listed in Table II.1.

The proposed incinerators will each have a charging rate of 400 tons per day.

Table II-1

<u>Proposed Maximum Emission Rate (Ton/Yr) (1)</u>	
<u>Particulate Matter</u>	<u>90</u>
<u>Volatile Organic Compounds</u>	<u>44</u>
<u>Sulfur Dioxide</u>	<u>701</u>
<u>Carbon Monoxide</u>	<u>395</u>
<u>Nitrogrn Oxides</u>	<u>657</u>
<u>Lead</u>	<u>4.4</u>
<u>Mercury</u>	<u>1.1</u>
<u>Beryllium</u>	<u>0.003</u>
<u>Fluorides</u>	<u>13</u>
<u>Sulfuric Acid Mist</u>	<u>17</u>

(1) Based on processing 1200 tons per day. MSW for 365 days per year

p.6

The applicant ultimately plans to construct a 1600 ton per day municipal solid waste (MSW) incinerator facility to be located on Faulkenburg Road in Tampa, Florida.

The present plans are to install the 400 tons per day (TPD) incinerator-boiler units to process a total of 1200 TPD of MSW and generate 29 megawatts of electrical power.

Each incinerator will have an approximate heat input of 150 million Btu per hour, or 49 megawatts, based upon a MSW calorific content of 4500 Btu per pound. Each incinerator will be scheduled to operate 8760 hours per year and on this basis the tons per year of the various air pollutants emitted as calculated.

Screening analyses were initially run using 26 prescribed meteorological conditions with the stack and emission data of the proposed ERF. These runs determined the worst-case boiler operating condition, identified those pollutants emitted from the ERF with a potential for significant impact, and established receptor locations for the more refined modeling. The results of these analyses indicated that a 110 percent boiler load condition (440 tons per day throughput) yielded the greatest air quality impact with the maximum ground-level concentrations occurring approximately 400 meters from the stack.

Table V-2

<u>Pollutant</u>	
<u>Particulate Matter</u>	<u>0.38</u>
<u>Sulfur Dioxide</u>	<u>3.2.</u>
<u>Carbon Monoxide</u>	<u>1.8</u>
<u>Nitrogen Oxides</u>	<u>3.0</u>
<u>Lead</u>	<u>0.02</u>
<u>Hydrocarbons (non-methane)</u>	<u>0.2</u>
<u>Mercury</u>	<u>0.0052</u>
<u>Beryllium</u>	<u>1.0000131</u>
<u>Fluorides</u>	<u>0.06</u>
<u>Sulfur Acid Mist</u>	<u>0.0768</u>
<u>Hydrogen Chloride</u>	<u>4.0</u>

(1) Based on a throughput of 110 percent of design capacity and the operation of four incinerator

Table V-3

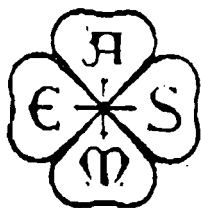
(1) Highest second-high concentration assuming four incinerators

p.4

The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.

= 440 Tpy

Combustion Fundamentals for Waste Incineration



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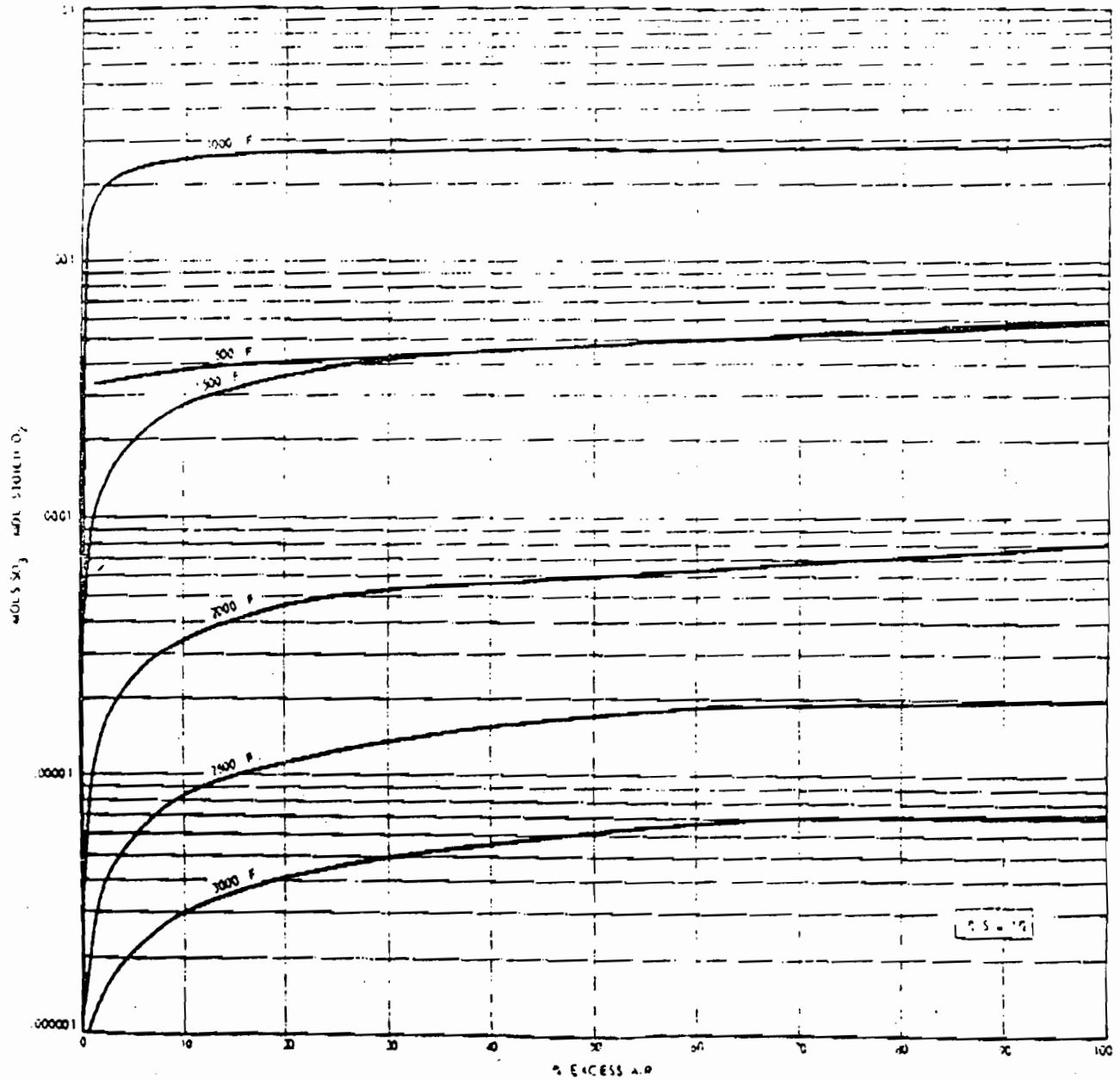


FIG. 8.1

ATTACHMENT "C" P. 4

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EDITOR'S NOTE Numbers in parentheses indicate equations. References are noted by numbers in brackets and appear at the end of their respective Chapter or Table. Numbered Source references (also in brackets) for Appendices G and H appear only within the text, since they primarily comprise text material.

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ATTACHMENT "C" P. 2

Chapter 8 - Sulfur Oxides

When sulfur is present in a hydrocarbon fuel, it will form oxides under equilibrium combustion conditions. These can be either sulfur dioxide (SO_2) or sulfur trioxide (SO_3). The amount that goes to SO_3 in relation to SO_2 will always be small, but it is often important. The SO_3 form readily combines with water vapor to form a high dew point sulfuric acid that can be both visible and corrosive. Equilibrium calculations for sulfur containing hydrocarbon fuels were made in the following limits:

Sulfur Content: 0.67 to 5.47%
 Excess Air: 0 to 100%
 Temperature: 500 to 3000°F

The results are plotted on Fig. 8.1. Values of SO_3 expressed as mols per mol of stoichiometric oxygen are plotted vs. excess air in percent with values given along lines of constant temperature. The curve is drawn for 1 percent sulfur fuel content by weight. Values for other percent sulfur contents can be obtained by multiplying the curve by the ratio of the actual sulfur content to one.

Example:

A 2.8 percent sulfur fuel is burned at 2000°F with 25 percent excess air. Determine the ppm of SO_2 and SO_3 if the hydrocarbon part of the fuel is represented by C_4H_8 .

From Fig. 8.1, a value of 0.00005 mols SO_3 per stoichiometric mol of O_2 is found at 2000°F and 25 percent excess air. This is for a 1 percent sulfur fuel.

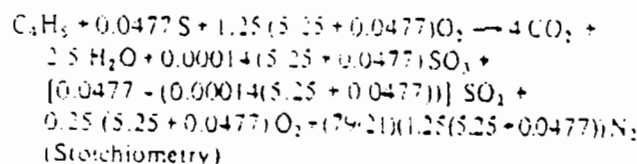
For a 2.8 percent sulfur fuel, the amount of SO_3 produced would be:

$$(2.8)(0.00005) = 0.00014 \text{ mols } \text{SO}_3 \text{ per mol stoic. } \text{O}_2$$

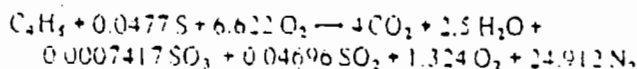
To convert to ppm:

$$\begin{aligned} 4 \text{ mol } \text{C}_4\text{H}_8 &= 53 \text{ lbs} \\ 1-.028 &= 0.972 \text{ lbs } \text{C}_4\text{H}_8 \text{ per } 0.028 \text{ lbs S} \\ (0.028/32) &= 0.000875 \text{ mols S; } 0.972 \text{ lbs } \text{C}_4\text{H}_8 \\ \left(\frac{0.000875}{0.972}\right)(53) &= 0.0477 \text{ mols S/mol } \text{C}_4\text{H}_8 \end{aligned}$$

So



or:



On a dry basis, the ppm of SO_3 is:

$$\begin{aligned} \text{ppm } \text{SO}_3 &= \frac{0.0007417}{4 + 0.0007417 + 0.04696 + 1.324 + 24.912} \times 10^6 \\ &= \frac{0.0007417(10^6)}{30.2837} = 24.5 \end{aligned}$$

$$\text{ppm } \text{SO}_2 = \frac{0.04696(10^6)}{30.2837} = 1550.7$$

$$\text{ppm } \text{SO}_x = 24.5 + 1550.7 = 1575$$

Similar calculations can be made for any fuel whose molecular form or ultimate analysis is known. Note that for this particular case, 16 percent of the sulfur was converted to SO_3 .

The relationship of mols to pounds per million Btu can also be calculated or approximated.

Example:

Express the results of the previous example as lbs/10⁶ Btu. Since neither a heat of formation nor heating value is available for C_4H_8 , assume 1 mol of stoichiometric O_2 is equal to a fuel heating value of 184,000 Btu.

$$\begin{aligned} \text{lbs } \text{SO}_3 / 10^6 \text{ Btu} &= \frac{0.00014 \text{ mols } \text{SO}_3}{\text{mol } \text{O}_2} \times \frac{\text{mol } \text{O}_2}{184,000 \text{ Btu}} \times 10^6 \times \frac{80 \text{ lbs}}{\text{mol } \text{SO}_3} \\ &= 0.06 \end{aligned}$$

$$\text{lbs } \text{SO}_2 / 10^6 \text{ Btu} = \frac{1550.7 \text{ ppm } \text{SO}_2}{24.5 \text{ ppm } \text{SO}_3} \times \frac{64 \text{ lbs } \text{SO}_2}{80 \text{ lbs } \text{SO}_3} \times 0.06 = 3.014$$

JULY 31, 1987

BEFORE THE GOVERNOR AND CABINET
OF THE STATE OF FLORIDA

IN RE: Hillsborough County)
Resource Recovery Project)
Modification of Certification)
Case No. PA 83-19)
_____)

STIPULATION AND AGREEMENT

WHEREAS, in August, 1984, Hillsborough County, Florida filed an application for certification of an electric generating resource recovery (solid waste to energy) facility; and

WHEREAS, the application for certification was reviewed and recommended for approval by the Florida Department of Environmental Regulation (DER), the Southwest Florida Water Management District (SWFWMD), the Department of Community Affairs (DCA), and the Florida Public Service Commission (PSC), pursuant to the Florida Electrical Power Plant Siting Act (Act), §403.501-.519, Florida Statutes; and

WHEREAS, the Hillsborough County resource recovery facility has been built and is ready to commence full time operation; and

WHEREAS, Hillsborough County needs to modify two conditions of certification; and

WHEREAS, the DER, SWFWMD, DCA, and PSC are willing to assist Hillsborough County in this regard; and

WHEREAS, the Act provides in Section 403.516(2), Florida Statutes, that the conditions of certification may be modified by mutual written agreement of the parties to the certification proceeding, subject to the approval of the Governor and Cabinet, sitting as the Siting Board;

NOW, THEREFORE, the DER, SWFWMD, DCA, PSC, and Hillsborough County hereby stipulate and agree that the conditions of certification for the Hillsborough County resource recovery facility should be modified in the manner described in paragraphs

1 and 2 below. The underlined words should be added to the conditions of certification; the ~~stricken~~ words should be deleted.

1. Condition II.A.1.a.(3) shall be modified to read as follows:

(3) Nitrogen Oxides: 3 ~~lb~~/ton 6.4 lb/ton.

2. Condition II.A.1.a.(8) shall be modified to read as follows:

(8) Visible emissions: opacity from each boiler shall not be greater than fifteen percent (15%) except that visible emissions of no more than twenty percent (20%) opacity may be allowed for up to 3 minutes in any one hour except during start up or upsets when the provision of 17-2.250, F.A.C. shall apply. Opacity from the ash handling facility baghouse shall not exceed 5%. Opacity compliance shall be demonstrated in accordance with Florida Administrative Code Rule 17-2.700(6)(a)., DER method 9. The compliance test requirements for the ash handling facility shall be waived in accordance with Rule 17-2.700(3)(d), F.A.C.

FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

DATE

BY: _____
DALE TWACHTMANN, SECRETARY
DAN THOMPSON, GENERAL COUNSEL
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

SOUTHWEST FLORIDA WATER
MANAGEMENT DISTRICT

DATE

BY: _____
GARY KUHL, EXECUTIVE DIRECTOR
DAN FERNANDEZ, GENERAL COUNSEL
2370 Broad Street
Brooksville, Florida 33512

DRAFT

DEPARTMENT OF COMMUNITY AFFAIRS

DATE

BY: _____

THOMAS PELHAM, SECRETARY
LAWRENCE KEESEY, GENERAL COUNSEL
2572 Executive Center Circle, East
Tallahassee, Florida 32399

FLORIDA PUBLIC SERVICE COMMISSION

DATE

BY: _____

KATIE NICHOLS, CHAIRMAN
MICHAEL TWOMEY, ASSISTANT COUNSEL
101 East Gaines Street
Tallahassee, Florida 32399-2400

HILLSBOROUGH COUNTY

DATE

BY: _____

DAVID S. DEE
Carlton, Fields, Ward, Emmanuel,
Smith, Cutler, & Kent, P.A.
Post Office Drawer 190
Tallahassee, Florida 32302

and

JOE HORN MOUNT
County Attorney
Post Office Box 1110
Tampa, Florida 33601

DSD/vc:Hills-RR4

...and the

DER

BUREAU OF AIR QUALITY MANAGEMENT

TWIN TOWERS OFFICE BUILDING

2600 BLAIR STONE ROAD

TALLAHASSEE, FLORIDA 32399

[illegible]

Clair Fancy
August 10, 1987
Page Two

with the statements in the Preliminary Determination which suggest that the Florida PSD regulations, State Implementation Plan, Power Plant Siting Act, or original Hillsborough County PSD permit were not valid.

2. Page 1, paragraph 1. For purposes of completeness, the Preliminary Determination should discuss the PSD permit (PSD-FL-104) that was issued by the United States Environmental Protection Agency (EPA). Specifically, a preliminary determination was prepared and public comments were solicited by DER on April 6, 1986. DER issued a final determination and recommended issuance of the permit on May 21, 1986. A second PSD permit (PSD-FL-104) for the County's facility was issued by EPA on July 7, 1986.

3. Page 2, paragraph 1. The Preliminary Determination should state that the resource recovery facility has been built. It is no longer a "proposed" project.

4. Page 2, paragraph 2. The Preliminary Determination should be revised to show that "The ERF is ~~will be~~ located . . ." near Faulkenberg Road. Since the site has been the scene of construction activity for the last 2 ½ years, DER should delete the statement that "[t]he site has been recently used as improved pasture for cattle grazing."

5. Page 2, paragraph 3. "The ~~proposed~~ site of the Hillsborough County ERF" is in an area designated as nonattainment for ozone.

6. Pages 2-3, Section II, Rule Applicability. Hillsborough County has requested modifications to certain permit conditions for the resource recovery facility. In the Preliminary Determination, DER classified the County's request as a major modification to a major source. We are not sure whether EPA will agree with DER's decision. Since we have had problems in the past with EPA's approvals of this project, we would like to ensure that EPA approves the proposed DER procedure and decision in this case. Accordingly, we respectfully request the Department to obtain a letter or other written statement from EPA acknowledging that: (a) DER's characterization of the County's request is appropriate; (b) DER followed the proper procedure when evaluating the County's request; and (c) DER's decision is appropriate. We believe this issue is extremely important because we do not want EPA to subsequently challenge the Department's activities in this case.

Clair Fancy
August 10, 1987
Page Three

7. Page 8, paragraph 3, Modelling Methodology. It should be noted that the prior modelling for the facility utilized a conservative approach. The stack parameters and emission rates were based on a maximum facility capacity of 1,760 tons per day and 100% facility availability. As currently constructed, however, the plant will normally handle approximately 1200 tons per day. In addition, it is generally assumed that resource recovery facilities will only be available approximately 85% of the time.

8. Page 10, paragraph 2. The predicted maximum ambient air quality impact for the proposed emissions of NO_x is 1 ug/m³. The preliminary determination incorrectly states that the impact will be 11 ug/m³.

Draft PSD Permit

1. We are concerned about DER's plan to issue a new permit (PSD-FL-121), rather than modify the existing PSD permit (PSD-FL-104). We believe it would be simpler for DER to issue a permit modification that only addresses the specific changes that will be affected by the Department's proposed action. Accordingly, we believe it is unnecessary for the Department to repeat all of the general conditions and specific conditions that have been incorporated into the draft PSD permit (PSD-FL-121). For ease of reference, we have prepared a draft permit and attached it as Exhibit A.

2. Page 1, paragraph 3. The draft permit should expressly state that the emissions limits and testing protocol for sulfuric acid mist have been deleted. As written, the draft permit appears to include the emission limits and testing methods for sulfuric acid mist.

3. Page 4, paragraph 13. All three of the appropriate spaces should be marked to signify that this permit constitutes a determination of BACT, PSD, and NSPS.

4. Page 6, paragraph (4). This requirement should be modified as follows:

Each of the emission limits in conditions (1) and ~~through~~ (3) is to be expressed as a three hour average . . . The concentration standards in conditions (1) ~~(2)~~ and (3) are included as the primary compliance limit

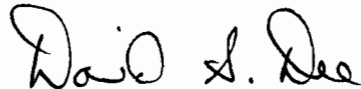
Clair Fancy
August 10, 1987
Page Four

5. Page 7. A new paragraph 1.a.(7) should be added. It should expressly state that the emission limitation for sulfuric acid mist has been deleted.

6. Page 8, paragraph 1.c.(2)g. Method 7E should be used to determine compliance for nitrogen oxides rather than Method 7.

Please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "David S. Dee". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Dee".

David S. Dee

cc: Bill Thomas
Daryl Smith
Joe Mount
Emmy Acton
Richard Seelinger
Bob Hauser
Don Elias
Bill Gillen

DSD/vc:Hills-RR

P. Healey

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

July 14, 1987

Mr. Miguel Flores
Chief, Permit Review and Technical
Support Branch
National Park Service-Air
Post Office Box 25287
Denver, Colorado 80225

Dear Mr. Flores:

RE: Technical Evaluation & Preliminary Determination
PSD-FL-121
Past Permit: PSD-FL-104
Hillsborough County Resource Recovery Facility

Enclosed for your review and comment is the Technical Evaluation & Preliminary Determination and draft permit for the above referenced facility. If you have any comments or questions, please contact Barry Andrews or Tom Rogers by August 14, 1987, at the above address or at (904)488-1344.

Sincerely,

Margaret V. Janes
Margaret V. Janes
Bureau of Air Quality
Management

/mj

cc: Russ Galipeau, NPS-SE Regional Office
Glen A. Carowan, Jr., US Fish & Wildlife Service
Chassahowitzka National Wildlife Refuge

enclosure

File Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

July 14, 1987

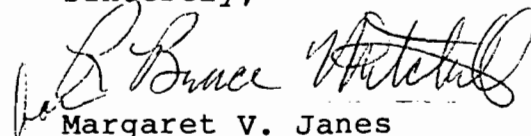
Mr. Wayne Aronson
Chief
Program Support Section
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Technical Evaluation & Preliminary Determination
PSD-FL-121
Past Permit: PSD-FL-104
Hillsborough County Resource Recovery Facility

Enclosed for your review and comment is the Technical Evaluation & Preliminary Determination and draft permit for the above referenced facility. If you have any comments or questions, please contact Barry Andrews or Tom Rogers by August 14, 1987, at the above address or at (904)488-1344.

Sincerely,


Margaret V. Janes
Bureau of Air Quality
Management

/mj

enclosure

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

July 14, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard W. Seelinger
Executive Vice President
Ogden Martin Systems of
Hillsborough County, Inc.
40 Lane Road, CN 2615
Fairfield, New Jersey 07007-2615

Dear Mr. Seelinger:

Attached is one copy of the Technical Evaluation, Preliminary Determination, and draft permit to increase the allowable nitrogen oxides, sulfuric acid mist, and particulate emissions from the resource recovery facility in Hillsborough County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BA/s

attachment

cc: Louis Tortora, Jr., P.E.
Bill Thomas
Wayne Aronson
Miguel Flores
Jerry Campbell
Sandra Freedman, Mayor of Tampa
Pam Iorio, County Commissioner

P 408 531 208

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Mr. Richard W. Seelinger Ogden Martin Sys. of Hil	
Street and No. 40 Lane Road, CN 2615	
P.O., State and ZIP Code Fairfield, NJ 07007-2615	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 07/14/87 PSO-FL-121	

PS Form 3800, Feb. 1982

<p>SENDER: Complete items 1, 2, 3 and 4.</p> <p>Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.</p> <p>1. <input checked="" type="checkbox"/> Show to whom, date and address of delivery.</p> <p>2. <input type="checkbox"/> Restricted Delivery.</p>		<p>3. Article Addressed to: Mr. Richard W. Seelinger Ogden Martin System of Hillsborough County Inc. 40 Lane Road, CN 2615 Fairfield, New Jersey 07007-2615</p>		<p>4. Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p> <p>Article Number P 408 531 208</p>		<p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>	
5. Signature - Addressee X		6. Signature - Agent X <i>Seelinger</i>		7. Date of Delivery 7/17/87		8. Addressee's Address (ONLY if requested and fee paid)	

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Hillsborough County
Hillsborough County Courthouse
419 Pierce Street
Tampa, Florida 33602

DER File No. PSD-FL-121

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

Ogden Martin Systems on behalf of Hillsborough County, applied on May 1, 1987, to the Department of Environmental Regulation for a permit to increase the allowable nitrogen oxides, sulfuric acid mist and particulate existing refuse to energy facility located in Hillsborough County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

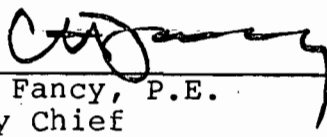
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

Richard W. Seelinger
Louis Tortora, Jr., P.E.
Bill Thomas, SW District
Wayne Aronson, EPA
Miguel Flores, NPS
Jerry Campbell, HCEPC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on July 14, 1987.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Margaret H. Jones
Clerk

7/14/87
Date

**OGDEN MARTIN SYSTEMS
OF HILLSBOROUGH INC.**

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000

PM
8 March 1988
West Caldwell, NJ

File Copy



AN OGDEN COMPANY

RECEIVED

MAR 11 1988

DER-BAQM

March 7, 1988

Mr. Hamilton Oven
Florida Department of Environmental Regulation (DER)
2600 Blainstone Road
Tallahassee, FL 32399-2400

Subject: Hillsborough County Resource Recovery Facility
PSD Renewal

As discussed on Thursday, March 3, 1988, please find attached various PSD related documents. Of particular concern is the letter on PSD Permit No. FL-121 which cites a March 31, 1988 expiration date for that permit, approving our requested NO_x and H₂SO₄ limit modification. This letter is to request DER's confirmation of our conversation that no additional action is needed on Ogden's part to extend this PSD permit since the Florida Site Certification (as filed August 31, 1984) is effective for the life of the Facility. If any additional follow-up action is needed, please let me know at your earliest convenience as the March 31st date is rapidly approaching.

Please feel free to call me or Joe Treshler at (813) 684-5688 if you have any questions.

Sincerely yours,

OGDEN MARTIN SYSTEMS, INC. 201 882 7248

Gary K. Crane, Ph.D.
Vice President
Environmental Permitting

GKC:sh
Attachs.

cc: Clair H. Fancy, Florida DER (all w/attachs.)
J. Glen, OMS Hillsborough
J. Treshler, OMS Hillsborough
D. Strobbridge, CDM
D. Smith, Hillsborough
T. Smith, Hillsborough

*This is one of those
that needed Site Certification
and Federal PSD permit.
They do not need operating permit
need to write him a letter
explaining this. Have engineer
(Prockey) call them, call EPA,
and check with Bertzy and
draft letter for my sig
by Friday March 25th*

first class

**OGDEN MARTIN
SYSTEMS, INC.**

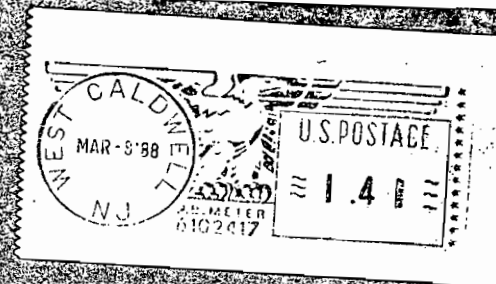
40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615

G. Crane



AN OGDEN COMPANY

Clair H. Fancy
Florida Department of Environmental Regulation
(DER)
2600 Blainstone Road
Tallahassee, FL 32399-2400





NOV 2 1987

4APT/APB-am

PM
2 Nov. 1987
Atlanta, GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

File Copy

DER

NOV 4 1987

BAQM

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-2400

Re: Hillsborough County PSD-FL-¹²¹120

Dear Mr. Fancy:

This is to acknowledge receipt of your October 14, 1987, PSD final determination for modifications at the above referenced facility. We have reviewed the changes made to the draft permits submitted to EPA on July 14, 1987, and find them to be in accordance to our recommendations of September 11, 1987. We, therefore, concur on your final determination and the permits issued to Hillsborough County.

We will retain copies of the determinations and permits for our records.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Copied: CHF/BT

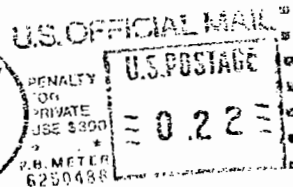
Barry Andrews

Jon Rogers

} 11/6/87

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300
AIR-4



Mr. C. H. Fancy, P.E., Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-2400

11/6
C.H.F. > FYI
R.B. > Thanks
(4)



CARLTON, FIELDS, WARD, EMMANUEL, SMITH, CUTLER & KENT, P. A.

ATTORNEYS AT LAW

ONE HARBOUR PLACE
P. O. BOX 3239
TAMPA, FLORIDA 33601
(813) 223-7000

CNA BUILDING
P. O. BOX 1171
ORLANDO, FLORIDA 32802
(305) 849-0300

200 EAST GOVERNMENT ST.
P. O. BOX 12426
PENSACOLA, FLORIDA 32562
(904) 434-0142

FIRST FLORIDA BANK BUILDING
P. O. DRAWER 190
TALLAHASSEE, FLORIDA 32302
(904) 224-1585

FLORIDA NATIONAL BANK TOWER
P. O. BOX 4700
JACKSONVILLE, FLORIDA 32201
(904) 354-1600

RECEIVED

PLEASE REPLY TO:

October 14, 1987

OCT 15 1987

Tallahassee

FEDERAL EXPRESS

Daryl Smith, Director
Hillsborough County Department
of Solid Waste
925 E. Twiggs Street
Tampa, Florida 33601

BY SOLID WASTE DEPARTMENT

RE: PSD Permit for Hillsborough County
resource recovery facility

Dear Mr. Smith:

Enclosed is a copy of the PSD permit signed by Secretary Twachtmann of the Department of Environmental Regulation.

Please call if you have any questions.

Sincerely,

Vickie Cantley

Vickie Cantley
Secretary to David Dee

cc: Dan Strobbridge (w/attachment) FEDERAL EXPRESS
Bob Hauser (w/attachment)
Joe Treshler (w/attachment)
Bill Gillen (w/attachment)
Joe Mount (w/attachment)
Emmy Acton (w/attachment)
Tom Smith (w/attachment)
Don Elias (w/attachment)
Al Phillips (w/attachment)

/vc:Smith-10

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Richard W. Seelinger
Executive Vice President
Ogden Martin Systems of
Hillsborough County, Inc.
40 Lane Road, CN 2615
Fairfield, New Jersey 07007-2615

October 14, 1987

Enclosed is permit No. PSD-FL-121 for the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site in Hillsborough County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

Copy furnished to:

Louis Tortora, Jr., P.E.
Bill Thomas, SW Dist.
Wayne Aronson, EPA

Miguel Flores, NPS
Jerry Campbell, P.E., EPCHC
Sandra Freedman, Mayor of Tampa

Pam Iorio, County Commissioner
Protecting Florida and Your Quality of Life

COMMISSION
PHYLLIS BUBANSKY
JOE CHILLURA
SILVIA KIMBELL
LYDIA MILLER
JIM NORMAN
JAN KAMINIS PLATT
ED TURANCHIK

FAX (813) 272-5157



ROBERT STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 5TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

June 7, 1994

Virginia Wetherell, Secretary
Department of Environmental Protection
2800 Blair Stone Road
Tallahassee, Florida 32399

Dear Ms. Wetherell:

In our continuing effort to improve the efficiency and appropriateness of environmental regulation, I am compelled to relate to you a recent incident which exacerbates rather than eliminates any underlying mistrust on the part of all involved:

Last August, my staff identified what appeared to be a significant deviation from the conditions of a PSD permit held by the County's Resource Recovery Facility. After confirming our understanding with DEP (then DER) staff, we issued a warning to the County. As a double check, DEP provided written verification of our interpretation by letter to the County in January. Despite objection, the County prudently altered its operational practices to meet our concerns, changes claimed to be of substantial cost to the public.

Since January, the County has been trying to solicit the assistance of OGC. Assured by DEP staff that we were in concert, EPC staff resented the apparent end-around, but did not object since a DEP permit was involved. A meeting was finally arranged for June, some many months later. At the meeting, and without prior consultation or notice of any problem to us (or apparently to DEP staff), Richard Donalan of OGC announced to us, the County and the facility operator, that the conditions of the permit upon which we had been relying, were meaningless and unenforceable: no limiting condition, no violation, no purpose to the last 8 months...

Not to dispute here the legal conclusions reached, I do object to the manner in which this all occurred. My staff did its level best to verify with yours before taking a position adverse to a permittee, but for the protection of our public. Confident of our joint position, my staff was never-the-less publicly humiliated by what appeared to them to be a DEP roll over. Not privy to conversations or arguments made to OGC, we were not afforded notice of any need to further evaluate our position, instead being made to look incompetent, improperly imposing unreasonable demands on permittees. Concurrently, the County and facility operator learned that they could neutralize us by "going over our heads." The County could reasonably argue that, but for the delay in getting OGC's attention on this matter, they would have saved the public (us) the expense of altered practices and legal consultation. And I'm sure that DEP staff will come to resent our efforts to monitor pollution locally, since it appears to put them in the position of having to take a stand, which another arm of their own agency can later overturn without consultation.

Virginia Wetherell, Secretary

June 7, 1994

page two

It is no wonder that regulatory pronouncements are mistrusted and challenged, that permittees seek to pit agencies against each other, that influential permittees seek to eliminate local regulatory implementation as it affects them, or that our respective agency staffs are caught in the uncertain middle. Incidents like this are not conducive to cooperative implementation of environmental regulations through delegation or otherwise, and in the end are destructive to all our efforts to protect the public from pollution. We cannot allow such circumstances to occur if we are to develop an effective and streamlined regulatory system at the state and ultimately national level.

Please help us find a solution.

Sincerely,

A large, stylized handwritten signature in dark ink, appearing to read "Roger P. Stewart".

Roger P. Stewart
Executive Director

ljh

xc: Richard Donelan, Esquire ✓
Emmy Acton, Esquire

(resource.ltr)

2/16

Emily Acton, HC ~~Capitol~~ ^{attorney}, met with
Solid waste because they did not
want to modify their permits as
requested in 1/4 ltr Lewis to Smith
She wrote 2/25 ltr to Richard Donahue
thanking him for meeting with her
and acknowledging business' willingness to attend
HCEPC enforcement

3/31

Kay Smith, contacted Perry Rolston OGC to

4/11

Memo HCEPC Sarah Fotopoulos
to Emily Acton of enforcement
discussion

5/11

Meeting ^{was} scheduled but never
occurred because Jerry Campbell
couldn't attend. ~~meeting~~ It was
rescheduled once before occurring 6/3

6/3

Meeting Richard Donahue, H Librarian
County SW and HCEPC met.
Mentioned to JB prior to meeting that
it would occur ~~about~~ a couple
weeks before the meeting. Also
mentioned the meeting 5/10 to Clair
at Grants mty Atlanta. Contacted
Richard's ~~and~~ voice mail and asked that
Richard discuss this issue before any meeting.

I N T E R O F F I C E M E M O R A N D U M

Date: 07-Jun-1994 05:40pm EST
From: Preston Lewis TAL
LEWIS_P
Dept: Air Resources Management
Tel No: 904/488-1344
SUNCOM:

TO: John Brown TAL	(BROWN_J)
TO: Clair Fancy TAL	(FANCY_C)
TO: Richard Donelan TAL	(DONELAN_R)
TO: Douglas Outlaw TAL	(OUTLAW_D)
TO: Hamilton Buck Oven TAL	(OVEN_H)

Subject: Hillsborough County MWC - revision

I erroneously stated in the last sentence of #3 "100 TPD". It should read "1200 TPD". Sorry.

Jerry Campbell said
- 2/16 HCEPC got copy of the letter
- 3/2, ltr from County attorney to OGC
indicating DEP willing to ~~attend~~ *reopen* the
issue.

INTEROFFICE MEMORANDUM

*- Completed EPL
referral from an
enforcement in
May 1994.*

Date: 07-Jun-1994 03:23pm EST
From: Preston Lewis TAL
LEWIS_P
Dept: Air Resources Management
Tel No: 904/488-1344
SUNCOM:

TO: John Brown TAL (BROWN_J)
TO: Clair Fancy TAL (FANCY_C)
TO: Richard Donelan TAL (DONELAN_R)
TO: Douglas Outlaw TAL (OUTLAW_D)
TO: Hamilton Buck Oven TAL (OVEN_H)

Subject: Hillsborough County MWC - Daily Capacity

Can we meet tomorrow (6/8/94) at 4:30 pm in the BAR conference room to discuss the Hillsborough County MWC? We feel that HCEPC should be included via telephone since they have enforcement authority and are apparently discussing taking enforcement against the facility since 1988 for exceeding the 1200 TPD limit charging rate.

Richard,
If you agree, will you fax this to them and get a number that we can call?

Background on Hillsborough County MWC

1. EPA issued PSD permit dated 5/21/86 (DER lacked delegation)
Site Certification finalized 6/17/86
PSD modification (H2SO4 and SO2 increased) dated 10/14/87
2. Site Certification did not specify the daily tons per day (TPD) but did limit the tons per hour (TPH) to 36666 lbs/hr which calculated to be 1320 TPD (based on 24 hours per day)
3. The PSD permit mentioned 1200 TPD in the description, but did not state a daily limit in the specific conditions. Nor did the specific conditions limit the annual emissions. However, the throughput is limited to 36666 lbs/hr. The air emission are stated as lbs/ton of waste for PM/PM10, SO2, H2SO4, VOC, NOx, CO, lead, fluoride, beryllium. Mercury had a limit of 2200 grams/day. In the Final Determination discussion table II-1 states the TPD and has a footnote that it is "Based on processing 100 tons per day MSW for 365 days".
1200
4. A search of the application and supporting documents used to write the permit indicated each of the MWC's would have a capacity of 400 TPD. Originally the application was for four units but it was later reduced to three.
5. The PSD modeling was done for the maximum hourly throughput (1320 TPD) and did not violate an Ambient Air Quality Standards.

would you

6. In a 12/17/93 meeting we notified Ogden Martin that we believed that the subject facility was intended to be limited to 1200 Tons per Day (TPD) based on a file search of both information submitted by the applicant and DEP file data.
7. On 1/4/94 we notified Hillsborough County (ltr Lewis to Smith) that to operate above 1200 TPD that they would need to apply for a modification of their PSD permit and Site Certification.
8. On 6/7/94 Richard Donelan informed us that HCEPC had discussed enforcement action going back to 1988 for exceeding the 1200 TPD. Furthermore, since the Site Certification failed to even mention a daily limit, it would take precedence over the PSD permit (TECO case decision) should this end up in court.

* write letter to Doyle ^{Smith} asking what gives
maybe a fir in April 95 to submit
Title V

CC Roger Stewart

RECEIVED

JUN 4 1994

Bureau of
Air Regulation

BOARD OF COUNTY COMMISSIONERS
HILLSBOROUGH COUNTY, FLORIDA

Office of the County Attorney

FYI Kay

Emeline C. Acton, County Attorney
Ronald G. McCord, Chief Assistant
Donald R. Odom, Chief Assistant
Jennie Granahan Tarr, Chief Assistant
Guilene F. Theodore, Chief Assistant
John Dixon Wall, Chief Assistant
Joseph Egozcue, Administrator



County Center
601 E. Kennedy Blvd. -- 27th Floor

P.O. Box 1110
Tampa, Florida 33601
(813) 272-5670
Fax (813) 272-5231

REC'D

M E M O R A N D U M

MAY 11 1994

ENV. PROT. COMM.
OF H.C.

DATE: May 10, 1994

TO: Jerry Campbell, Professional Engineer
Environmental Protection Commission

FROM: Susan M. Allan, Assistant County Attorney

SUBJECT: Hillsborough County Resource Recovery Facility

Please attend a regarding the above-referenced matter on June 3, 1994, at 2:00 p.m., in the County Attorney's Office, 27th Floor. Representatives of the Department of Environmental Protection and Hillsborough County will also be attending. Please confirm your attendance.

SMA/bcb

Copy to: Emeline C. Acton, County Attorney
Sara Fotopulos, EPC Legal Counsel
Daryl H. Smith, Director, Dept. of Solid Waste
Tom Smith, Section Mgr., Dept. of Solid Waste
Daniel Strobridge, Camp Dresser & McKee Inc.

memo. jc/93-757-03

Best Available Copy

**BOARD OF COUNTY COMMISSIONERS
HILLSBOROUGH COUNTY, FLORIDA**

Office of the County Attorney

Emeline C. Acton, County Attorney
Ronald G. McCord, Chief Assistant
Donald R. Odom, Chief Assistant
Jennie Granahan Tarr, Chief Assistant
Guilene F. Theodore, Chief Assistant
John Dixon Wall, Chief Assistant
Joseph Egozcue, Administrator



RECEIVED

APR 29 1994

**E.P.C. OF H.C.
AIR PROGRAM**

April 27, 1994

County Center
601 E. Kennedy Blvd. -- 27th Floor

P.O. Box 1110
Tampa, Florida 33601
(813) 272-5670
Fax (813) 272-5231

REC'D

APR 29 1994

**ENV. PROT. COMM.
OF H.C.**

VIA FACSIMILE AND U.S. MAIL

Richard Donelan, Esquire
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

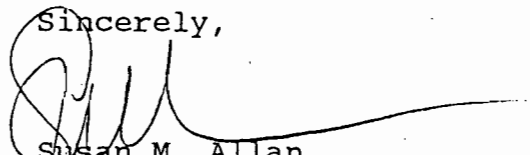
RE: Hillsborough County Resource Recovery Facility

Dear Mr. Donelan:

By letter dated April 21, 1994, Hillsborough County invited you and appropriate Department of Environmental Protection staff to attend a meeting in Tampa regarding Hillsborough County's Resource Recovery Facility. Also invited were representatives of the Hillsborough County Environmental Protection Commission (EPC). Jerry Campbell, with EPC, has requested that this meeting be rescheduled to Thursday, May 19th at 10:00 a.m. Please advise me if your schedule will permit this change.

I look forward to seeing you during the month of May.

Sincerely,


Susan M. Allan
Assistant County Attorney

SMA/bcb

Copy to: Emeline C. Acton, County Attorney
Daryl H. Smith, Dir., Dept. of Solid Waste
Sara Fotopulos, Chief Counsel, EPC
Jerry Campbell, Prof. Eng., EPC

letter.rd2/93-757-01

4/19/94 LgH

BOARD OF COUNTY COMMISSIONERS
HILLSBOROUGH COUNTY, FLORIDA

Office of the County Attorney

Emeline C. Acton, County Attorney
Ronald G. McCord, Chief Assistant
Donald R. Odom, Chief Assistant
Jennie Granahan Tart, Chief Assistant
Guilene F. Theodore, Chief Assistant
John Dixon Wall, Chief Assistant
Joseph Egocue, Administrator



County Center
601 E. Kennedy Blvd. -- 27th Floor

P.O. Box 1110
Tampa, Florida 33601
(813) 272-5670
Fax (813) 272-5231

VIA FACSIMILE and US MAIL

April 15, 1994

Richard Donelan, Esquire
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Hillsborough County Resource Recovery Facility

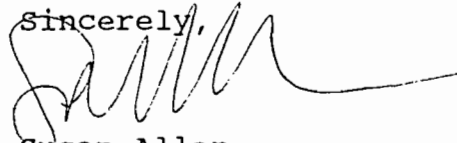
Dear Mr. Donelan,

Approximately two months ago, you met with Emmy Acton and indicated that you would assist in coordinating a meeting between the County, the Florida Department of Environmental Protection (DEP), and the Hillsborough County Environmental Commission (EPC) regarding potential capacity limitation issues at the County's Resource Recovery Facility (RRF). I have tried several times to contact you to make arrangements for the meeting, but have not been able to reach you. By letter dated February 25, 1994 and by Federal Express on March 28, 1994, I sent you background information explaining the issues in detail.

The County has recently received a memorandum from Sara Fotopulos (copy attached), Chief Counsel for the EPC, advising the County that EPC must take enforcement action on this matter very shortly. Furthermore, since this issue arose in August 1993, the County has been operating the RRF at a maximum of 1200 tpd, resulting in current diversions of approximately 1000 tons per week and substantial disposal costs. Some of this waste is being landfilled, using valuable landfill space. The additional disposal costs could reach a total of from \$700,000 to over \$1 million if this matter remains unresolved (see the attached memorandum from Thomas Smith). Therefore, it is imperative that this matter be resolved quickly.

We are available to meet with DEP and EPC, either in Tallahassee or Tampa, on May 6 or May 11. I would like to make final arrangements for this meeting so that this issue may be resolved as soon as possible. Please let me know early next week on your availability and that of DEP staff. I extend my thanks for your assistance in this regard.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Susan Allan', with a long horizontal flourish extending to the right.

Susan Allan
Assistant County Attorney

cc: Emeline Acton, County Attorney
Donald Odom, Chief Assistant County Attorney
Daryl Smith, Director, Department of Solid Waste
Thomas Smith, Manager, Department of Solid Waste
Sara Fotopulos, Chief Counsel, EPC

21209
COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
SYLVIA KIMBELL
LYDIA MILLER
JIM NORMAN
JAN KAMINIS PLATT
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

MEMORANDUM

DATE: April 11, 1994

TO: Emmy Acton, County Attorney

FROM: Sara M. Fotopulos, Chief Counsel *SMF*

SUBJECT: Hillsborough County Resource Recovery Facility

Pursuant your request, we called Richard Donelan's office to see whether a meeting has been scheduled, or is in the process of being scheduled. Doing so, his secretary indicated that she did not know of such a meeting, but would inquire and let us know. We have not heard anything.

Not achieving resolution, field staff have referred the matter to their enforcement coordinator to take the next step. This would be the issuance of a Notice of Intent to take enforcement - Not a Citation. The enforcement coordinator activities functions on a time line and must take some action fairly soon.

We however, repeat our willingness to meet and discuss this matter. We do not understand a need to wait for DEP action.

Please follow through on your arrangements and advise. I have asked staff to await your efforts at resolution as long as their standard operating procedures permit.

ljh

(resource.2)

RECEIVED

APR 12 1994

COUNTY ATTORNEY

BOARD OF COUNTY COMMISSIONERS
HILLSBOROUGH COUNTY, FLORIDA

Kay

Office of the County Attorney

Emeline C. Acton, County Attorney
Ronald G. McCord, Chief Assistant
Donald R. Odom, Chief Assistant
Jennie Granahan Tarr, Chief Assistant
Guilene F. Theodore, Chief Assistant
John Dixon Wall, Chief Assistant
Joseph Egoscue, Administrator



Frederick B. Karl Legal Center
725 E. Kennedy Boulevard, Suite 300

P.O. Box 1110
Tampa, Florida 33601
(813) 272-5670
Fax (813) 272-5231

February 25, 1994

Richard Donelan, Esquire
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Hillsborough County Resource Recovery Facility

Dear Mr. Donelan:

I appreciate your meeting with me on February 16, 1994, on such short notice. Your input will be of great value regarding the warning notice received by Hillsborough County for the Resource Recovery Facility.

You indicated that you would be willing to attend a meeting in Tampa in order to resolve the outstanding issues. Representatives from the Florida Department of Environmental Protection (DEP), the Environmental Protection Commission (EPC), and the County will be invited. If you wish for us to assist you in coordinating this meeting, please contact Susan Allan, Assistant County Attorney. She and I would be happy to help in whatever way we can.

The remainder of this letter will set forth the issues and a statement of the County's position. Copies of the relevant documents are attached.

BACKGROUND

On July 29, 1993, a representative from EPC visited the County's Resource Recovery Facility (RRF) for a regulatory inspection. EPC issued, on August 12, 1993, a warning notice to the Hillsborough

LETTER.RD/93-757-01

Richard Donelan
February 25, 1994
Page 2

County Department of Solid Waste stating that the RRF was operating in a manner inconsistent with the terms of its permit. EPC contends that the RRF is limited to firing a maximum of 1,200 tons per day (TPD) and that the facility manager could not provide information which demonstrated the charging rate at the time of the EPC inspector's visit.

The County's position is that the maximum charging capacity of the facility is 1,320 TPD and that the County is able to supply information demonstrating the charging rate within a reasonable period.

SUPPORT FOR COUNTY'S POSITION

Specific Condition No. 3 of PSD-FL-121 (page 8) states, "The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each." This equates to 1,320 TPD. The math works out as follows:

$$\frac{36,666 \text{ pounds per hour}}{2,000 \text{ pounds per ton}} = 18.33 \text{ tons per hour}$$

$$18.33 \text{ Tons/Hr.} \times 3 \text{ Boilers} \times 24 \text{ Hr./Day} = 1,320 \text{ TPD}$$

The permit application supports this interpretation by indicating that the actual tonnage processed is expected to vary from day to day because the heating value of the waste varies. Specifically, the application at Volume III, Section 3.4 (page 3-9) states:

The resource recovery facility will consist of four boilers¹ each capable of firing 400 TPD of reference waste...at its maximum continuous rating (MCR). This firing rate will be adjusted as the waste quality changes, i.e., changes in the higher heating value (HHV). This is because one of the objectives of plant operation is to maintain the heat load to the boiler by maintaining the heat release on the grate. When the HHV is low (higher moisture and ash fractions, lower combustibles

¹The County is operating only three boilers at this time.

fraction) more waste will ~~be~~ processed, up to 440 per boiler². (Emphasis added).

It is noted that throughout the permit application, the Site Certification, and the PSD permit itself, references are made to a "1,200 TPD facility". It is the County's position that this refers only to the nameplate capacity (what the facility is referenced as), but does not indicate a regulatory limit, nor does it reflect what the facility was tested at or is capable of processing.

It is also important to note that if the tons per day are averaged on a yearly basis, the RRF averages 1,200 TPD.

One of the main purposes of the permit is to set emissions limits which may not be exceeded by the RRF. The RRF does not exceed any permit emissions limitations by operating at 1,320 TPD.

Hillsborough County has been operating based on this interpretation of the permit since the facility opened in 1987. The County has submitted regular reports and data to EPC and DEP, including this information and has never received any objections.

Regarding the ability for the County to supply information demonstrating the charging rate of the RRF, General Condition No. 15 of PSD-FL-121 states in pertinent part, "When requested by the Department, the permittee shall within a reasonable period of time furnish any information required by law which is needed to determine compliance with the permit." Currently, there is no instrumentation which exists which can reliably measure the tons of solid waste charged into a boiler on an hourly basis. The County's operator of the RRF looks at data obtained from the truck weigh scales and combines this with data obtained from changes in the refuse pit inventory from week to week in order to calculate the daily processing rates. The County is able to supply this information within a reasonable time. However, if quicker verification is necessary, steam flow may be used to verify the charging rate. This is more fully set out in the proposed DEP letter attached.

²Operating at 440 TPD per boiler equals 1,320 TPD.

PROCEDURAL ISSUES

DEP has suggested that the County go through a modification of the existing PSD permit. The County believes that the regulations for permit modifications are not applicable to this situation, and that this matter should be clarified by a letter from DEP setting forth the interpretation of the permit documents.

DEP cites Section 17-210.300(1), Florida Administrative Code, as requiring a permit modification if there is an increase in actual emissions. However, because the RRF has not changed its operations, often at 1,320 TPD, since opening in 1987, there has been no "actual increase in emissions" from what the facility has, in fact, been operating at for the last six years. I do not believe the intent of these regulations is to cause stationary sources to file permit modifications if their processing rate fluctuates each year, thereby causing increases and decreases in emissions. Instead, it appears that the intent of the regulations is to trigger a review when the method of operation of a facility is being modified or when production increases may result in exceeding a permit emission limitation. The emissions limits set forth in the County's permit will not be exceeded if the RRF is operated at 1,320 TPD.

Section 17-210.300, as well as Section 17-212, are specifically applicable to new facilities or modified facilities. The RRF does not fit into any of the categories: it is not being constructed or modified. Furthermore, the County has not changed its method of operating the RRF since commencement of operations in 1987, the County is not proposing any changes in operation, and the method of operation does not vary from the method of operation described in the permit application.

COST IMPACT

In order to avoid any claim of non-cooperation or continuing violation, the County has been operating at 1,200 TPD. The monetary impact to the County is significant. If the County does not burn the solid waste at its RRF, it is diverted to Pasco County, the City of Tampa, or the County landfill. To date, the County has incurred approximately \$192,500 worth of disposal charges resulting directly from these diversions. It is anticipated that the County will incur between \$500,000 to \$800,000

Richard Donelan
February 25, 1994
Page 5

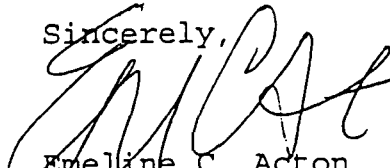
in additional disposal costs on a yearly basis, over and above the County's diversions for other reasons.

RESOLUTION

Attached is a proposed letter for DEP to review which clarifies the interpretation of the permit documents, including the Site Certification and the permit application, which coincides with the way the RRF has actually been operated since 1987. We believe that the permit documents support operation in this manner so that no permit modification is necessary, but simply a letter from DEP outlining the understanding of what the permit means.

I look forward to meeting with you on this issue in the near future. If there is any further information I can supply you prior to the meeting, I will be happy to do so.

Sincerely,



Emeline C. Acton
County Attorney

ECA/sma/bcb

Attachments

Copy to: Susan Allan, Assistant County Attorney,
(no attachments)
Donald Odom, Chief Assistant County Attorney,
(no attachments)
Frederick B. Karl, County Administrator
Sara Fotopulos, EPC Legal Counsel
Daryl H. Smith, Director, Solid Waste Dept.,
(no attachments)
Tom Smith, Section Mgr., Solid Waste Dept.,
(no attachments)
Daniel Strobbridge, Camp Dresser & McKee Inc.,
(no attachments)

LETTER.RD/93-757-01

Letter for FDEP Signature

Distribution: Hillsborough County EPC
Hillsborough County Department of Solid Waste
FDEP Southwest District Office

Subject: Hillsborough County Solid Waste Energy Recovery Facility

Dear _____:

As a result of a compliance inspection conducted by the Hillsborough County Environmental Protection Commission on July 29, 1993, this Department has undertaken a review of the Site Certification 83-19 and PSD-FL-121 permit for the referenced facility. Our review focused upon the permit application in support of the permitted capacity of the facility and specific conditions within these permits for verifying compliance.

Our review indicated that the air quality modeling analysis was in fact performed for a 1600 ton per day (tpd) facility consisting of four units rated at 400 tpd each firing 110% (440 tpd) of their nominal rated capacity. (See Exhibit A, PSD Application, Volume III Air Quality, Application for Power Plant Site Application.) Further, the application describes boiler operations as expected to fire the boilers up to 110% of the nameplate capacity of the facility. (See Section 3.4 Boiler Operations.)

Annual air quality impacts were based upon the facility operating at 1600 tpd, 365 days per year. The results of the analysis indicate that acceptable air quality impacts would occur as a result of operating the facility in the manner described above.

A PSD permit and site certification were granted for the initial nominal facility capacity of 1200 tpd. In recognizing that the facility would be able to charge up to 110% of nominal facility capacity, a specific condition was included in the PSD permit to establish the maximum charging rate per boiler of 36,666 pounds each. The conditions of Site Certification required that stack testing be performed at plus or minus 10% of the heat rate input of 150 million Btu per hour per boiler.

While perhaps the conditions of these permits were not artfully drafted, it is clear on the basis of the information contained in the application for these permits in combination with the specific conditions thereto, that the maximum permitted charging rate is 36,666 pounds of solid waste per hour per boiler or 110% of the nameplate rating of the facility.

To clarify any confusion over the permitted capacity of the facility, PSD-FL-121 and Site Certification 83-19 shall be interpreted to limit the facility to charging no more than 36,666 pounds per unit per hour, 1,320 tons per day and no more than 1,200 tons per

day on an annual average basis. These limitations are consistent with the air quality analyses presented in the application for these permits.

To assist in verifying compliance with these limitations, steam flow shall be used as a surrogate for hourly and daily charging rate limitations. Using steam flow for this purpose is consistent with 40 CFR Part 60.58a subparagraph (h)(6)(i) and subparagraph (j)(1), the New Source Performance Standards pertaining to compliance and performance testing of Municipal Waste Combustors. (See attachments.) The steam flow shall not exceed 98,400 pounds per hour per boiler.

This steam flow determination is based upon the following:

$$\frac{4,500 \text{ Btu/lb waste} \times 36,666 \text{ lb waste/hr}}{1,677 \text{ Btu/lb Steam}} = 98,388 \text{ lb/hr Steam}$$

Note that the boiler efficiency of 1,677 Btu input per pound steam is based upon the average efficiency demonstrated by the Hillsborough facility during the 1993 calendar year.

Compliance with the 1,200 tpd annual average charging rate shall be determined on the basis of a 52-week rolling average weight of solid waste received and processed at the facility. The truck weigh scale records shall be used for this purpose.

Please note these clarifications and maintain a copy of this letter in your permit files for this facility.

Sincerely,

Attachments



Lawton Chiles
Governor

Florida Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

February 25, 1994

Mr. John Power
Hillsborough County Resource Recovery Facility
350 Falkenberg Road
Tampa, FL 33619

Dear Mr. Power:

The Hillsborough County Resource Recovery Facility (RRF) is on a priority list from EPA's Office of Air Quality Standards, Emissions Standards Division, for obtaining specific operating information. For the Hillsborough County RRF, the following information for each unit, if available, is needed:

- a. ESP Design Inlet Temperature
- b. ESP Inlet Temperature Operating Data
- c. Dioxin/Furan Test Data

Your response must be submitted in writing and is needed by Tuesday, March 1, 1994. The Division of Air Resource Management FAX number is 904/922-6979.

If you have any questions, please call Doug Outlaw or Preston Lewis at 904/488-1344. I have attached a copy of the letter from EPA/Region IV requesting the the Department to provide the ESP and dioxin/furan test data.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

attachment

cc: Bill Thomas, DEP/Tampa
Scott Davis, EPA/Region IV
Daryl H. Smith, Hillsborough County



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

FACSIMILE CORRESPONDENCE

DATE: FEB 24 1994

FROM: Scott Davis *Scott Davis*
Air Enforcement Branch

TO: Preston Lewis
Air Permitting Branch
Florida Department of
Environmental Protection

The following list of municipal waste combustor facilities are on a priority list from EPA's Office of Air Quality Standards, Emissions Standards Division, for obtaining specific operating information. For these sources, the following data is desired:

- ESP Design Inlet Temperature
- ESP Inlet Temperature Operating Data
- Dioxin/Furan Test Data

As a minimum, the information on ESP Inlet Temperatures (both Design and Operating Data) must be submitted in writing to EPA Region IV from these sources:

1. Hillsborough County Resource Recovery Facility (3 units)
2. Pinellas County Resource Recovery Facility (3 units)
3. Tampa municipal waste combustor (4 units)
4. Bay County Waste to Energy (2 units)

Further information will be relayed to you by telephone, and your questions and comments can be discussed at that time. Thank you for your assistance in this matter.

OPTIONAL FORM 90-7-90

FAX TRANSMITTAL

TO: <i>preston Lewis</i>	FROM: <i>Scott Davis</i>
DEPARTMENT: <i>FLORIDA DEP</i>	PHONE: <i>404-347-5014</i>
FAX: <i>404-922-6979</i>	FAX: <i>404-347-3059</i>
USE 7540-01-817-7008	5095-101 GENERAL SERVICES ADMINISTRATION

Hillsborough County RRF
9/30/93

PL
for files
on
TOS 83

<u>Name</u>	<u>Representing</u>	<u>Telephone</u>
Preston Lewis	FDEP - AIR	(904) 488-1344
John Brown	FDEP - BAR	904 488 1344
JERRY CAMPBELL	EPC HILLS. CTY	813-272-5530
Buck Owen	DEP - Siting	(904) 487-0472
Joe Truesher	Ogden Martin	813-684-5688
THOMAS G. SMITH	Hillsborough County	(813) 744-5680
Daryl Smith	Hillsborough City	(813) 744-5680
Dan Strabridge	Camp Slosser + McKee	(813) 221-2833
John A. Paves	Ogden Martin	(813) 684-5688
Raymond R. Tull	Ogden	(201) 882-7288
Steve Bass	Ogden	813-856-2917
J. P. Burbuck	Ogden	813-684-5688

HILLSBOROUGH COUNTY

Florida

Office of the County Administrator
Frederick B. Karl

SEP 29 1993

BOARD OF COUNTY COMMISSIONERS

Phyllis Busansky
Joe Chullura
Sylvia Kimbell
Lydia Miller
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Ed Turanchik



Senior County Administrator

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Edwin Hunzeker

Cecilia Johnson (Interim Appointment)

Jimmie Keel

Robert Taylor (Interim Appointment)

September 27, 1993

Mr. Hamilton S. Oven, P.E., Administrator
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Subject: Hillsborough County Solid Waste Energy Recovery Facility
Permit No. PSD-FL-121 and Site Certification No. 83-19:
Request to Change Units Expressing Facility Capacity From
Pounds of Solid Waste to Pounds of Steam

Dear Mr. Oven:

As you are aware, Hillsborough County, Florida, Department of Solid Waste received a Warning Notice (see Attachment), dated August 12, 1993, from the Hillsborough County Environmental Protection Commission (EPC) alleging violation of the Hillsborough County Solid Waste Energy Recovery Facility's operating permit, and referencing Specific Condition No. 3 and General Condition 15. These permit conditions relate to respectively: boiler capacity, expressed in pounds per hour solid waste loading; and providing information within a reasonable period of time to demonstrate compliance.

While we understand that there may be a jurisdictional issue regarding regulatory authority, we do not wish to be a party to any dispute. We do want to resolve the issue of reasonably demonstrating to the EPC an hour-to-hour boiler loading capacity.

Precisely measuring the quantity of solid waste charged into a boiler over a short period (one hour) is generally beyond the capability of commercially available weighing or other measuring equipment. However, an industry and U.S. EPA accepted surrogate for measuring boiler capacity utilization is steam flow. Steam flow is an operating parameter which is continuously monitored at the Facility. Steam flow indicates boiler capacity utilization and can be correlated to refuse through-put.

Mr. Hamilton } S. Oven
September 27, 1993
Page Two

To avoid future confusion and misunderstandings, we respectfully request an administrative change to Specific Condition No. 3 of Hillsborough County's PSD-FL-121 permit. The new condition would read: "Each boiler shall not be operated in excess of a steamload of 103,763 pounds steam per hour". The same change is also requested for Hillsborough County's Site Certification No. 83-19, Condition 11.A.1.c.

The following details are provided in support of the requested steam flow designation. The current permit allows the County to charge up to 36,666 lbs (18.33 tons) of solid waste per hour per unit as you confirmed in your letter of August 30, 1993. The design steam flow at the maximum continuous rate (MCR) is 94,333 lbs per hour per unit or 5,658.8 lbs steam per ton of solid waste charged.

94,333 lbs steam/hour divided by 16.67 tons solid waste/hour
equals 5,658.8 lbs/steam/ton solid waste

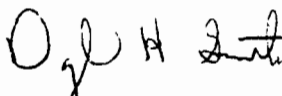
Therefore, maximum steam flow per hour per unit should not exceed 103,726 lbs per hour.

18.33 tons solid waste/hour multiplied by 5,658.8 lbs
steam/ton solid waste equals 103,725.8 lbs steam/hour.

We believe this administrative change will allow all parties involved to efficiently administer and demonstrate compliance with the Facility's permit conditions related to capacity and solid waste through-put.

Thank you for your consideration. Should you have any questions in this regard, do not hesitate to contact me at (813) 744-5680.

Sincerely,



Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County, Florida

DHS/ts

Attachment

xc: Clair Fancy, FDEP
Dan Strobridge, CDM
Joseph Treshler, OMSH

ATTACHMENT #1

No. 14697

Roger P. Stewart
Executive Director
272-5980



Date issued: 8/12/93
S 18 T 29 R 20

ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY

WARNING NOTICE

Responsible Party (Company/Person) Mr. Daryl Smith / Director
Mailing Address: Hillsborough County Solid Waste Department, P.O. Box 1110
Tampa, FL 33601 Phone: _____
Location of alleged violation: Faulkenburg Road, Tampa

Date and time of alleged violation: 7/29/93, 9:30 a.m.

Alleged violation pursuant to:

Chapter 84-446 Laws of Florida (Act):

- ☐ (Act) Section 13 Unauthorized open burning
☐ (Act) Section 16 Causing or allowing nuisance or injury
☐ (Act) Section 17 Causing water/air/noise pollution
☐ (Act) Section 17 Violating rule/standard/order;

Chapter 4.03G Failure to operate in a manner that is consistent with the terms of
Chapter : the permit.

Other: Specific Condition No. 3, General Condition No. 15

The violations here alleged may not include possible concurrent violations of other applicable environmental laws: local, state or federal including those of the Environmental Protection Commission. Facts believed to constitute alleged violation:

Failure to demonstrate compliance with process rate (Specific Condition No. 3).

Exceeding 1200 TPD process rate.

By copy of this Notice, the responsible party is informed that Commission staff believes that based upon the information available, a violation may have occurred. If substantiated, appropriate administrative or legal action will occur to assure compliance with the Environmental Protection Act of Hillsborough County and the Rules of the Environmental Protection Commission of Hillsborough County. If you believe that the above does not constitute a violation as alleged, you are encouraged to immediately contact the investigator named below. If the violation is substantiated, cooperative resolution and correction may avoid enforcement action in this matter.

Because continuation of a violation subsequent to this Notice may be considered to be an intentional violation, it is recommended that you cease the above activity and until this matter is resolved you:

Cease causing the above violation. This matter may be referred to our enforcement
section. Submit any documents that will support claim of compliance.

Investigator: Charmelle Fox Phone #: 272-5530 Received by: CERTIFIED MAIL #
Sterlin Woodard
EPC Form No. WN 5/92 P 282 479 167



Lawton Chiles
Governor

Florida Department of Environmental Protection

Marjory Stoneman Douglas
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

August 30, 1993

Mr. Joseph R. Treshler, Vice President
Ogden Martin Systems, Inc.
Post Office Box 709
Brandon, Florida 33509-0709

Re: Hillsborough County Solid Waste Energy Recovery Facility
PA 83-19, PSD-FL-121

Dear Mr. Treshler:

The Department of Environmental Regulation has reviewed your letter of August 19, 1993. The Hillsborough County Solid Waste Energy Recovery Facility was certified by the Power Plant Siting Board on December 18, 1984. The certification, subject to the conditions set forth therein, constitute the sole license of the state as to the approval of the site and the construction and operation of the proposed electrical power plant (Section 403.511, Florida Statutes). Condition of Certification II.A.1.c. limits each boiler to a loading rate of 36,666 pounds per hour. The PSD permit PSD-FL-121 contains the same limitation.

I conclude that the Hillsborough County Warning Notice dated 8/12/93 is not in accordance with the Conditions of Certification and is therefore in error. Since the facility was certified pursuant to the Florida Electrical Power Plant Siting Act, Hillsborough County lacks the authority to take enforcement action without express delegation from the Department.

If you have any questions concerning this matter you may wish to contact Mr. Richard Donelan, Assistant General Counsel, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Sincerely,

Hamilton S. Owen
Hamilton S. Owen, P.E.
Administrator, Siting
Coordination Office

cc: Richard Donelan
Clair Fancy
Bill Thomas
Jerry Campbell
David Dee

DIANNE SPINGLER

Printed on recycled paper.

RECEIVED

SEP 1 1993

Division of Air
Resources Management

John P. JKB
John Brown

✓



Lawton Chiles
Governor

Florida Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

January 4, 1993

Mr. Daryl H. Smith
Director
Hillsborough County Solid Waste
Department
Post Office Box 1110
Tampa, Florida 33601

RE: Hillsborough County Solid Waste Energy Recovery Facility,
Permit No. PSD-FL-121, and Site Certification No. 83-19,
Facility Daily Tonnage Increase

Dear Mr. Smith:

An increase in the maximum permitted through-put rate above 1200 tons per day, as discussed in the meeting on December 17, 1993, with the Department's Permitting and Standards Section, Bureau of Air Regulation and John Powers of Odgen Martin Systems, Inc., will require modification of Permit No. PSD-FL-121 in accordance with the requirements of 17-210.300(1), F.A.C., if the actual emissions increase. Any change in the method of operation of a stationary source or facility which increases the actual emissions of any air pollutant regulated under Rule 17-210, 17-212, 17-252, 17-272, 17-273, 17-275, 17-296 or 17-297, F.A.C., including any not previously emitted is a modification of the permit.

If the application does not result in a significant net emissions increase (as set forth in Rule 17-212.400(2)(e)2., F.A.C.), it would not be subject to the new source review requirements of Rule 17-212.400 - Prevention of Significant Deterioration, F.A.C. An increase in production rate of an existing facility, if that increase can be accomplished without an increase in capital expenditure on that facility, may also not be subject to 40 CFR 60, Subpart Ea - Standards of Performance for Municipal Waste Combustors, in accordance with 40 CFR 60.14(e). Therefore, the permit would be amended.

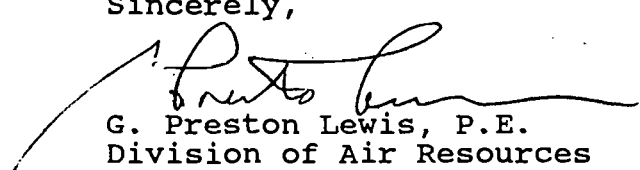
The site certification will not require revision if the facility is still in compliance with the rated capacity of each combustor unit and the emissions limits in the site certification are not exceeded. The most stringent emissions capacity rate in the site certification or the PSD permit will limit the maximum through-put rate at the facility.

Mr. Daryl H. Smith
January 4, 1994
Page Two

The applicant should submit a completed request for modification of the facility using the air permit application forms. The request for modification should include the basis for all emissions calculations. The applicant also should propose specific conditions for inclusion in the permit modification to verify compliance with the 1-hour and 24-hour firing rates.

If you have any questions regarding preparation of the request for modification, please contact Doug Outlaw or Preston Lewis at (904) 488-1344.

Sincerely,



G. Preston Lewis, P.E.
Division of Air Resources
Management

cc: Clair Fancy, DEP
John Brown, DEP
John Power, Ogden Martin
Joe Threshler, Ogden Martin
Tom Smith, HCEPC
Hamilton Oven, DEP

GPL/DO/bb

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 25, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary K. Crane
Ogden Martin Systems
40 Lane Road, CN 2615
Fairfield, New Jersey 07007-2615

Dear Mr. Crane:


Re: Hillsborough County Resource Recovery Facility
PSD Permit, PSD-FL-121

The Department has received your letter dated March 7, 1988, concerning the expiration date of the above referenced permit and agrees with your comments.

No additional action is needed on your part to extend the PSD permit which cites March 31, 1988, as the expiration date. The Florida Site Certification, filed August 31, 1984, is effective for the life of the project as described therein.

If you have any questions please call Pradeep Raval (permitting) or Barry Andrews (BACT) at (904)488-1344 or write to me at the above address.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/PR/s

cc: H. Oven, DER
B. Pittman, Esq.

P 274 010 449

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985
* U.S.G.P.O. 1985-480-794

Mr. Gary K. Crane	
Ogden Martin Systems	
Street and No. 40 Lane Road, CN 2615	
P.O., State and ZIP Code Fairfield, NJ 07007-2615	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 02-25-88 PSD-FL-121 Hillsborough County	

☐ **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
Mr. Gary K. Crane
Ogden Martin Systems
40 Lane Road, CN 2615
Fairfield, NJ 07007-2615

4. Article Number
P 274 010 449

5. Signature — Addressee
[Signature]

6. Signature — Agent
[Signature]

7. Date of Delivery
3/2/88

8. Addressee's Address (ONLY if requested and fee paid)

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD

Always obtain signature of addressee or agent and **DATE DELIVERED**.

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

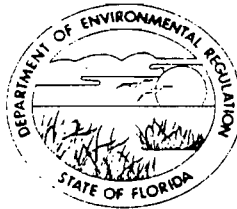
MAR 11 1988

DER-BAQM

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



PERMITTEE:
Hillsborough County
Hillsborough County Courthouse
419 Pierce Street
Tampa, Florida 33602

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988
County: Hillsborough
Latitude/Longitude: 27° 57' 00" N
82° 40' 22" W
Project: Hillsborough County Resource
Recovery Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the modification of a 1,200 ton per day resource recovery facility to be located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the proposed plant are 368.2 km E and 3092.7 km N.

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from this modification. Only specific conditions 1.a.(3), 1.b., and 1.c.(1) have been modified and/or added to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104). The other pollutants emitted from this facility are addressed in the original PSD permit.

Construction shall be in accordance with the attached permit application, plan, documents, and drawings except as noted in the Specific Conditions.

Attachments:

1. May 1, 1987, letter by Richard W. Seelinger.
2. June 8, 1987, letter by Bruce P. Miller, EPA Region IV.
3. June 12, 1987, letter by J. R. Treshler.

PERMITTEE:
Hillsborough County

Permit Number: AC PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Emission Limitations

- a. Stack emissions from each unit shall not exceed the following:
 - (1) Particulate matter: 0.021 grains per dry standard cubic foot corrected to 12% CO₂ (gr/dscf-12%) or 7.0 pounds per hour per unit, whichever is more restrictive.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity except that 20% opacity may be allowed for one six-minute period (average of 24 consecutive observations recorded at 15-second intervals) in any one hour. Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by EPA for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited. Opacity of other emission points at the plant shall not exceed 5%.

- (3) Nitrogen Oxides: 0.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive
- (4) Each of the emission limits in conditions (1) through (3) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (2) and (3) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e. dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.
- (5) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

Additionally, all portions of the proposed facility including the ash handling facility which have the potential for fugitive emissions will be enclosed. Also those areas which have to be open for operational purposes, e.g., tipping floor of the refuse bunker while trucks are entering and leaving, will be under negative air pressure.

- (6) Each of the three units is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards (NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.
- b. Ash handling facility emissions shall not exceed 1.63 pounds per hour.
- c. Compliance Tests
 - (1) Compliance tests for particulate matter, and, nitrogen oxides shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f), except that an annual test will be conducted for particulate matter. Compliance tests for opacity will be conducted simultaneously with compliance tests for particulate matter. The compliance test requirements for the ash handling facility shall be waived in accordance with Rule 17-2.700(3)(d), FAC.

Compliance tests shall be conducted for such time and under such conditions as specified by EPA prior to the compliance test. These conditions will be specified by EPA upon notification of performance tests as required by General Condition 1. The permittee shall make available to EPA such records as may be necessary to determine the conditions of the performance tests.
 - (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:
 - a. Method 1 for selection of sample site and sample traverses

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

- b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.
 - e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.
- (3) The stack tests shall be performed at $\pm 10\%$ of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.
- 2. The height of the boiler exhaust stack shall not be less than 220 feet above ground level at the base of the stack.
 - 3. The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.
 - 4. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.
 - 5. The permittee must submit to EPA and DER within fifteen (15) days after it becomes available to the County, copies of technical data pertaining to the incinerator boiler design,

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

to the electrostatic precipitator design, and to the fuel mix that can be used to evaluate compliance of the facility with the preceeding emission limitations.

6. Grease, scum, grit screenings or sewage sludge shall not be charged into the solid waste to energy facility boilers.

7. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to limit particulate emissions to no more than 0.021 grains per dscf corrected to 12% CO₂.

8. Stack Monitoring Program

The permittee shall install and operate continuous monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Rule 17- 2.710, FAC, 40 CFR Part 60, Subparts A and D, Sections 60.13 and 60.45 respectively, except that emission rates shall be calculated in units consistent with emission limits in this permit. The conversion procedure shall be approved by EPA.

9. Reporting

- a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office, the Hillsborough County Environmental Protection Commission (HCEPC) and EPA Region IV.

- b. Stack monitoring shall be reported to HCEPC, the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.1e

10. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

Issued this _____ day of _____, 19____

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

...

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action
on Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to Hillsborough County to increase the allowable nitrogen oxides, sulfuric acid mist, and particulate emissions from their existing energy recovery (municipal solid waste incineration) facility. The facility is located in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. A determination of best available control technology (BACT) was required.

This application was reviewed under Florida Administrative Code Rule 17-2.500, Prevention of Significant Deterioration. Emissions of nitrogen oxides, sulfuric acid mist, and particulates will increase by 739, 289, and 7 tons per year, respectively. The allowable emissions of the other pollutants are not being increased. The Department has completed a study of the potential ambient air impact due to the increase in emissions. Based on this study, the Department has reasonable assurance that the increase in emissions will not cause or contribute to an exceedance of the ambient air quality standards for these pollutants. No PSD increment analysis is required for this modification.

Persons whose substantial interests are affected by the department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32399-2400. If no hearing officer has been assigned, the petition is to be filed

with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application 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 Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Hillsborough County Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Technical Evaluation
and
Preliminary Determination

Hillsborough County, Florida

Resource Recovery Facility Modification
File No. PSD-FL-121

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

July 14, 1987

I. INTRODUCTION

Pursuant to Section 403.505, Florida Statutes, Hillsborough County applied to the Florida Department of Environmental Regulation (DER) in August 1984 for certification of a steam electric-generating, solid waste energy recovery facility at a site about two miles east of the town of Tampa on the County's Faulkenburg Road site. After a thorough review by DER, including public hearings, the Florida Power Plant Siting Board issued a site certification to the County. At that time, DER believed that such a site certification constituted a legal prevention of significant deterioration (PSD) permit under Chapter 17-2.500, FAC, of the Florida air pollution regulations which had been approved by the U.S. Environmental Protection Agency (EPA) on December 22, 1983. In the summer of 1985, EPA became aware that the Power Plant Siting Act (PPSA) under which the site certification was issued supercedes all other State laws, including the law under which Florida's air pollution regulations are adopted. Consequently, the Florida PSD regulations are superceded by the PPSA, and legally could not be approved by EPA as part of the State Implementation Plan (SIP) since the PPSA does not comply with the EPA's PSD regulations in several respects. Thus, the Hillsborough County Energy Recovery Facility (ERF), which was under construction, did not possess a valid PSD permit. EPA's remedy for this situation was to issue an Order under Section 167 of the Clean Air Act for Hillsborough County to either cease construction or apply for a Federal PSD permit under 40 CFR 52.21, U.S.C. On December 13, 1985, Hillsborough County applied to DER for a PSD permit. (By that time, DER had been given authority by EPA to conduct the technical and administrative steps of the Federal PSD permitting process.) In conducting the PSD review, EPA decided that, due to the unique circumstances of this permit application, the best available control technology (BACT) analysis would be conducted taking into account the factors affecting BACT at the time the County submitted a complete application for a site certification. That date was August 16, 1984.

On May 1, 1987, Ogden Martin Systems in behalf of Hillsborough County applied to DER to increase the allowable nitrogen oxides (NOx) and sulfuric acid mist emissions at the Hillsborough County ERF. This request for an emissions increase was based on recent testing of similar facilities in the United States indicating that the originally requested limits for these pollutants will be exceeded during normal operation. Subsequently, on June 16, 1987, Ogden Martin Systems on behalf of Hillsborough County submitted an application to operate/construct dust suppression equipment that was added to the final design of the ash handling building to ensure that there would be no visible emissions from this plant area.

The proposed project will be an ERF boiler which could use up to 1200 tons per day (TPD) of refuse as fuel. A proposed boiler expansion could increase the total solid waste processing capacity of the plant to 1600 TPD. The steam from the new boiler will be sent to a turbine generator with a capacity of 29 megawatts (MW) (gross). Hillsborough County has contracted with a full service vendor to design, construct, and operate the plant for 20 years. Generated electricity will be transmitted to the Tampa Electric Company (TECO) for distribution over the TECO transmission system. The generating capacity of the expanded plant should be approximately 39 MW. The primary purpose of the facility is to dispose of solid waste. In addition to electricity, recovered resources could be, steam, ferrous metals, and aluminum. Non-processible waste (including non-combustibles and demolition debris) and unusable residue will be buried at a licensed, off-site sanitary landfill. The sale of electricity, and eventually other processed and recovered resources, will help offset the overall cost of owning and operating the facility.

The ERF will be located on approximately 50.4 acres within the County's existing Faulkenburg Road tract. The site is located approximately 0.6 miles north of State Road 60. It is bordered by Faulkenburg Road on the east, by a TECO 230 KV transmission line corridor on the west, and by the Seaboard System Railroad on the south. The plant site is mostly level grassy land with scattered trees in the northwest portion. The site has been recently used as improved pasture for cattle grazing. The topography is fairly level, with elevation ranging from 27 to 45 feet above sea level across the tract. Geology of the site shows an overburden of sand and clay lying over limestone and dolomite which forms the Floridan Aquifer. The overburden forms a subsurface reservoir called the Shallow Aquifer. The proposed facilities will consist of a 29 MW steam electric generating turbine; three 400 tons per day mass-burn solid waste fired boilers; a mechanical draft cooling tower utilizing treated sewage effluent; a 220 foot flue gas stack; and electrostatic precipitators. Provisions are made to allow the addition of another 400 tons per day boiler.

II. Rule Applicability

The proposed site of the Hillsborough County ERF is in an area designated as nonattainment for ozone and particulate matter under 40 CFR 81.310, U.S.C., and attainment for all other criteria pollutants.

New major sources which emit attainment pollutants regulated under the Clean Air Act in amounts greater than certain significance levels are subject to 40 CFR 52.21, U.S.C. The significance levels are specified by the PSD regulations.

The proposed increase, which constitutes a major modification to

a major source, is, therefore, subject to PSD review under 40 CFR 52.21, U.S.C. because the modification will result in a significant net emissions increase of a criteria pollutant. These emission rates, and the PSD significant emission rates, are listed in Table II-1.

Table II-1

	<u>Requested (TPY)</u>	<u>Permitted (TPY)</u>	<u>Increase (TPY)</u>	<u>PSD Significant Rate (TPY)</u>
Nitrogen Oxide Emissions	1,396	657	739	40
Sulfuric Acid Mist Emissions	306	17	289	7
Particulate Emissions	97	90	7	N/A

The proposed source has the potential to emit more than 100 tons per year of one or more regulated pollutants and is, therefore, subject to review under 40 CFR 52.21, U.S.C. PSD review includes, among other requirements, a determination of Best Available Control Technology (BACT) and an air quality impact analysis for each attainment and noncriteria pollutant that would be emitted in a significant amount as listed in Table II-1.

III. Preliminary Determination

As noted in Section I, Table II-1, the proposed modification will result in significant emissions of NO_x, and sulfuric acid mist.

The increase in particulate emissions due to the dust suppression equipment added to the ash handling facility result in a total facility emission rate of 97 tons per year. The modification does not result in the facility being major for particulates (annual emissions of particulates exceed 100 tons per year) hence the increase constitutes a minor modification to a minor facility with respect to particulates. The emissions of the other regulated pollutants (volatile organic compounds, sulfur dioxide carbon monoxide, lead, mercury, beryllium, and fluorides) are not being changed by the requested modification. The July 7, 1986, Technical Evaluation and Final Determination for this source (PSD-FL 104) discusses the basis for the standards of the other regulated pollutants.

Initially, NO_x and sulfuric acid mist were expected to be emitted at a much lower level than recent testing of similar facilities has indicated. The applicant has informed DER that based on

these recent tests, the originally permitted emission rates for NOx and sulfuric acid mist will be exceeded during normal operation of the facility.

A BACT determination for NOx and sulfuric acid mist, which is included as part of this review, addresses the information and analysis used to revise the NOx and sulfuric acid mist standards for this facility.

After evaluating the information submitted by the applicant and the emission limitations for similar facilities, DER concluded that the applicant's request to increase NOx emissions to the requested level is consistent with BACT for these facilities. In addition, it was concluded that the sulfuric acid mist emission limit should be deleted from the permit conditions.

It has also been determined that the dust suppression equipment (baghouse) on the ash handling system provides a reasonable level of control and hence is consistent with the requirements for a modification of a minor source with respect to particulates.

The proposed emissions increase of NOx and sulfuric acid mist from the ERF are 739 and 289 tons/year respectively. Since these increases exceed the significant levels for PSD applicability they are subject to the requirements of this rule. In general, these requirements include:

- ° An analysis of existing air quality
- ° An Ambient Air Quality Standards (AAQS) analysis.
- ° An analysis of impacts on soils, vegetation, growth-related air quality impacts; and
- ° A "Good Engineering Practice" (GEP) Stack Height determination; and
- ° BACT

Based on these required analyses, DER has reasonable assurance that the proposed units at the Hillsborough County ERF, as described in this report and subject to the conditions of approval proposed herein, will employ BACT, will not cause or contribute to a violation of any PSD increment or ambient air quality standard, and will comply with all applicable air pollution regulations. A discussion of all review components follows.

IV. BACT Determination

The applicant has constructed a solid waste ERF located approximately two miles east of Tampa on the Hillsborough County Faulkenburg Road site. This ERF is capable of burning up to 1200 tons per day (TPD) of refuse as fuel, resulting in an electrical generating capacity of 29 megawatts.

The facility was issued a PSD permit in July 1986 (PSD FL-104) which limited the emission of NOx and sulfuric acid mist to 0.16 gr/dscf and 0.0040 gr/dscf corrected to 12% CO₂, respectively.

On May 1, 1987, the applicant submitted a letter requesting modifications to the permitted NOx and sulfuric acid mist limitations in the PSD permit, and the permitted NOx limitation in the Power Plant Siting Certification (PA 83-19). This request to modify the emission limitations for these pollutants was based on test data which has become available to the municipal solid waste combustion industry subsequent to the issuance of the aforesaid permits. Based on this data, the applicant has stated that the Hillsborough County ERF will be unable to meet the permitted levels for NOx and sulfuric acid mist (H₂SO₄ mist) and has requested an increase in these emissions limitations.

For permitting purposes, the applicant has proposed that the NOx limitation be increased from 0.16 gr/dscf at 12 percent CO₂ to 0.34 gr/dscf at 12% CO₂ for a three (3) hour average. The sulfuric acid mist limitation would be increased from 0.004 gr/dscf at 12 percent CO₂, to 0.072 gr/dscf at 12 percent CO₂ for a three (3) hour average.

Review Group Members

This determination was based upon comments received from the applicant, the Stationary Source Control Section, and EPA Region IV.

BACT Determined by DER:

Pollutant	Emission Limit
Nitrogen Oxides (NOx)	0.34 gr/dscf @ 12% CO ₂
Sulfuric Acid Mist	0.072 gr/dscf @ 12% CO ₂

BACT Determination Rationale

A review of the exhibits and data submitted by the applicant indicates that the emission levels originally proposed by the applicant are relatively low in comparison to similar facilities that have recently been tested.

Initially the applicant proposed an NOx emission limitation equivalent to 0.16 gr/dscf corrected to 12% CO₂. At the time of this proposal, (August 1984) there were no data available to Ogden or other similar corporations with regard to NOx emission levels being experienced by modern refuse burning facilities using state-of-the-art mass-burn technology. As a consequence, data derived from older facilities then in operation were used as the source of the NOx emission level requested in the application. The older facilities were neither designed nor

operated to achieve the high degree of combustion efficiency as that achieved by this facility and, perhaps predictably, testing has demonstrated that the older data are not compatible with emissions from modern facilities. Subsequent to submission of the present application, several resource recovery facilities around the country using improvements in combustion technology have gone into service. Two of these are Ogden facilities in Tulsa, Oklahoma and Marion County, Oregon. Operation of these facilities has shown that actual NOx levels are equivalent to those now being sought.

The applicant also seeks an adjustment of the emission level for sulfuric acid mist to reflect emissions of this substance from modern refuse burning facilities. The emission level for H₂SO₄ mist that was originally requested in the application, and later adopted in the permit, was not based upon operating results of facilities using current technology. At the time the application was submitted, no such data were available. In fact, it has only been very recently that H₂SO₄ mist emissions have been regulated in refuse burning facilities. The basis for the emission level contained in the application was a "theoretical" calculation derived from a formula found in an American Society of Mechanical Engineer's text published in 1974 involving a different type of operating temperatures.

Based upon the experience of resource recovery facilities recently coming into service, the sulfuric acid mist levels originally requested (August 1984) and adopted are also unrealistically low. The emissions of sulfuric acid mist and NOx measured at facilities which are similar to the Hillsborough County ERF are shown below, along with preliminary testing results at the Hillsborough County Facility.

EMISSION TEST DATA AND PERMIT LEVELS FOR NOx AND H₂SO₄

Pollutant	Tulsa		Marion		Wurzburg		Stockholm		Preliminary ⁽⁵⁾ Hillsborough Test Results
	Test ppm @ 12% CO ₂	Permit ppm @ 12% CO ₂	Test ppm @ 12% CO ₂		Test ppm @ 12% CO ₂		Test ppm @ 12% CO ₂		
NOx	385 ⁽¹⁾	404	357 ⁽²⁾		318 ⁽³⁾		311 ⁽⁴⁾		327
H ₂ SO ₄	12.4 ⁽⁶⁾	21.1			DATA NOT AVAILABLE				15.2

References:

- (1) Ogden Projects, Inc. Data, 3-hr rolling average, worse case.
- (2) Ogden Projects, Inc. Data, 3-hr rolling average, worse case.
- (3) Cooper Engineer's Report "Air Emission Testing at the Wurzburg, West Germany Waste-to-Energy Facility", June 1986, 3-hr average.
- (4) Ogden Projects, Inc. Report #124, averaging period unknown.
- (5) Preliminary data obtained during testing at the Hillsborough Facility, 3-hr average.
- (6) Ogden Projects, Inc. Report Number 101.

The requested emission limitations of 0.34 gr/dscf @ 12% CO₂ and 0.072 gr/dscf @ 12% CO₂ for NO_x and sulfuric acid mist are equivalent to 404 ppm @ 12% CO₂ and 39 ppm @ 12% CO₂, respectively.

Comparing these requested levels to the data for the other facilities it suggests that these requested limits are indeed reasonable.

In addition to comparing the requested emission limitations to the facilities incorporating similar designs as illustrated in the table above, the requested emission limits have been compared to the permitted emission levels of other mass burn type ERF's permitted in the State of Florida. In making the comparisons, the requested limitations have been converted to the equivalent emission rate in units of pounds of pollutant emitted per ton of refuse are combusted. These values for the pollutant NO_x are given below.

<u>Facility</u>	<u>Permitted NO_x Emission (lb/ton)</u>
Pinellas County	4.3
City of Tampa	7.2
Broward South	5.0
Broward North	5.0
Lake County	5.0
Hillsborough County	6.4*

* requested emission limitation

In accordance with these permitted NO_x emission limitations for other ERF's in the State of Florida, once again the applicant's request appears to be reasonable.

With regard to emissions of sulfuric acid mist from these facilities, the test data is very limited. Of the mass burn type resource recovery facilities operating or being constructed in the state, only the Hillsborough County ERF has a set an emissions limit for sulfuric acid mist. In fact, in preparing the PSD permits for both the South and North Broward County ERF's, Region IV of the EPA decided to not set an emission limitation for sulfuric acid mist, even though the quantity of these emissions exceeds the significant rate. With regard to this request to increase sulfuric acid emissions at the Hillsborough County Facility, Region IV, proposed that no emission limit be included in the permit.

This recommendation by Region IV is based on results obtained when using the Referenced Test Method (Method 8) for quantifying sulfuric acid mist emissions. EPA has stated in a letter to DER that due to concentrations of fluoride and ammonia in the flue gases, Method 8 is biased high. As is the case, no acceptable test method exists for measuring sulfuric acid mist emissions from municipal solid waste incinerators which has prompted the deletion of the sulfuric acid mist limitation entirely. In accordance with this determination, no emission limitation for sulfuric acid mist will be included in this permit.

V. Air Quality Analyses

The emission increases proposed at the ERF are subject to review under the PSD regulations. NOx and sulfuric acid mist both exceed the significant emission increase level for PSD applicability. Particulate matter, although increasing, will not be significant. A review has been completed to determine the air quality impact of these emission increases. Based on this review, DER has reasonable assurance that the ERF will not cause or contribute to a violation of any PSD increment or ambient air quality standard.

Modeling Methodology

The review of the proposed emission increases (modification) utilizes the dispersion modeling previously completed by the applicant in their original application for the new facility. DER has accepted this previous modeling since the new facility was just recently permitted and the only pollutant subject to modeling is NOx. The model used in that analysis was the EPA-approved Industrial Source Complex Short-term (ISCST) dispersion model. The details of that modeling can be found in the preliminary determination (PSD-FL-104) for the original new facility.

Only the facility itself was modeled for NOx; other sources of this pollutant in the area of the Hillsborough facility were considered as part of the background concentration. Since the predicted ambient concentration is linearly related to the emission rate, the impact of the emissions increase can easily be determined. The stack parameters and emission rates used in evaluating the ambient impacts are listed in Table V-1.

Analysis of Existing Air Quality

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD review. In general, one year of quality assured data using an EPA-reference, or the equivalent, monitor must be submitted. Sometimes less than one

Table V-1

Hillsborough County Energy Recovery Facility
Source and Emission Parameters

Stack Height (m)	Exit Temp. (k)	Exit Velocity (ms)	Stack Diameter (m)	NOx (g/s)	H ₂ SO ₄ (g/s)	UTM-E (km)	UTM-N (km)
67.0	494	16.9	3.50	58.9	12.8	368.2	3092.7

Table V-2

Hillsborough County Energy Recovery Facility
Ambient Air Quality Impacts

Pollutant and Averaging Time	Max. Impact Modification	Max. Impact Facility	Existing Background	Max. Total	National AAQS
NOx Annual	1 ug/m ³	2 ug/m ³	39 ug/m ³	41 ug/m ³	100 ug/m ³
H ₂ SO ₄ mist 24-hour	9 ug/m ³	9 ug/m ³	--	--	--

year of data, but no less than four months, may be accepted when DER approval is given.

An exemption to the monitoring requirement can be obtained if the maximum air quality impact, as determined through air quality modeling, is less than a pollutant-specific de minimus concentration. In addition, if current monitoring data already exist and these data are representative of the proposed source area, then at the discretion of DER these data may be used.

The predicted maximum air quality impacts of the proposed emission increase for NO_x is given in Table V-2. This value (11 ug/m³) is less than the de minimus level of 14 ug/m³. As such, DER is not requiring preconstruction monitoring for this pollutant. No de minimus impact level is defined for sulfuric acid mist and no preconstruction monitoring is being required. A background concentration of NO_x of 39 ug/m³ is based on the most recent year of existing monitoring data at a site 9.9 kilometers from the ERF.

Ambient Air Quality Standards Analysis

Given existing air quality in the area of the proposed Hillsborough County ERF, emissions from the modification are not expected to cause or contribute to a violation of an ambient standard. Table V-2 summarizes the total impact. Sulfuric acid mist is not included because no ambient air quality standard has been promulgated for this pollutant. It is regulated through the PSD review process by the application of BACT.

Additional Impacts Analysis

a. Impacts on Soils and Vegetation

The increased emissions of NO_x and sulfuric acid mist are not expected to cause or contribute to harmful impacts on soils and vegetation. Emissions of NO_x are predicted to increase ambient concentrations in the surrounding area by only a small fraction of the existing levels. Existing levels of this pollutant are dominated by automobile emissions. Emissions of sulfuric acid mist result in a maximum 24-hour concentration of 9 ug/m³. Much research is currently being done on the effects of acid moisture on soils and vegetation. There is no evidence at this time to expect detrimental effects at this concentration level.

b. Growth-Related Air Quality Impacts

The modification requested will not change employment, population, housing, or commercial/industrial development in the area to the extent that an air quality impact will result.

c. GEP Stack Height Determination

GEP Stack Height means the greater of: (1) 65 meters; or (2) the maximum nearby building height plus 1.5 times the building height or width, whichever is less. For the proposed project the building height is 42.7 meters above ground level and the projected width is 56.4 meters. Thus definition (2) above leads to a GEP Stack Height of 106.8 meters. The proposed stack height is 67 meters. This is less than the GEP Stack Height. The applicant has addressed the possible increased ground-level concentrations (as a result of aerodynamic downwash) by including a downwash mechanism in the modeling.

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 852-9000



June 12, 1987

HC-0861L
C-1005

Mr. Hamilton S. Oven, Jr., P.E.
State of Florida
Department of Environmental Regulation
2600 Blainstone Road
Tallahassee, Florida 32301

DER
JUN 16 1987
BAQM

Reference: Supplemental Information Power Plant
Site Certification No. PA83-19

Dear Mr. Oven:

At the request of the Hillsborough County Environmental Protection Commission, we are submitting additional back-up information covering the dust suppression system for the ash handling building of the Hillsborough County Solid Waste Energy Facility. Documents included for your review are a marked copy of DER forms 17-1.201 (1), Application To Operate and Construct Air Pollution Sources, along with technical data describing the dust suppression system selected for the ash handling building.

This dust suppression equipment was added to the final design of the ash handling building to ensure that there would be no visible emissions from this plant area. Operation of this equipment observed during the recent Performance Test have verified that there are, in fact, no visible emissions.

At the request of the Hillsborough County EPC, we have supplied this additional information to ensure that our permit application is complete. Accordingly, please consider this a formal request by OMSH on behalf of Hillsborough County that in accordance with DER regulation 172.700, paragraph (3)-(D) that this dust suppression unit be classified under the 5% opacity standard and that the testing requirements be waived, since the operating flow is 9,500 ACFM.

It is my understanding of the regulations that DER has the authority to request a visual observation of the performance of this unit. If it is DER's desire to have this visual observation made, OMSH would be glad to accommodate this request as verification of the unit's proper operation.

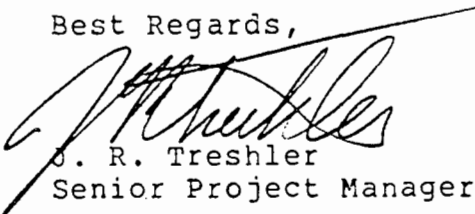
Hamilton S. Oven, Jr.

- 2 -

June 12, 1987

Once again, I would like to thank you for your continued help in the permitting process of our facility. I will contact you shortly to verify that the data submitted with this request is proper and sufficient to allow processing of this added information.

Best Regards,



J. R. Treshler
Senior Project Manager

JRT:hn
Attachment

cc: R. Hauser
P. Stoller
D. Strobbridge
D. Smith
T. Smith
D. Elias
D. Dee
D. Knight
J. Campbell - HCEPC
V. San Ajustin - HCEPC

SUPPLEMENTAL INFORMATION
ASH BLDG. DUST SUPPRESSION BAG HOUSE
HILLSBOROUGH COUNTY FLORIDA
SOLID WASTE ENERGY RECOVERY PROJECT

Flex-Kleen

Research-Cottrell

OPERATING, EQUIPMENT, AND CONSTRUCTION DATA

CUSTOMER: Fairfield Engineering Co.

P.O. NO.: DU-365D

FKO NO.: 12-84-30564

MODEL NO.: 84-WRBC-144(IIIG)

QTY.: 1

DATE: 02/21/86

TAG INFO.: P.O. #DU-365D

DRAWING NO.: A-86JC-040

DOC.REV.DATE: 04/11/86

DOC.REV.MARK: [a]

The information below will be considered CERTIFIED and no further transmittals of this document will be made unless there are changes agreed to between the customer and Flex-Kleen.

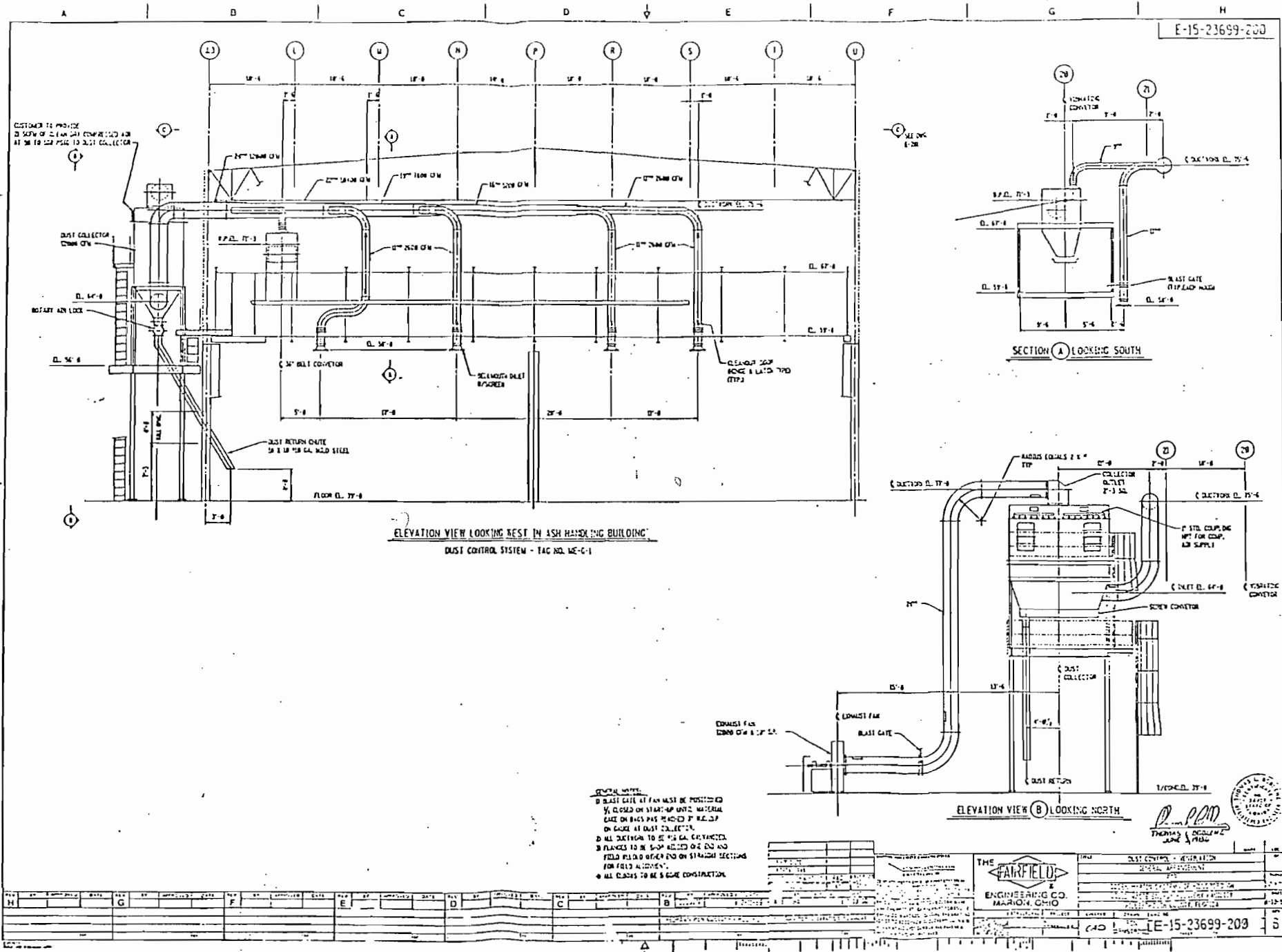
OPERATING DATA

Volume: 9,500 acfm¹ Cloth Area: 1,526 ft² Ratio: 6.23/1¹
Dust: Fly Ash
Dust Size:
Dust Density: lb/cu.ft. Dust Loading: gr/cu.ft.
Temperature: 70°F Dew Pt.: Deg.F
(collector temperature must be kept well above dew point)
End Use: Unknown
Weight: 5450 lbs. Location: Outdoors
Design Press.: 17" W.G. Operating Press.: 10"W.G. (Neg.)
Compressed Air Reqmts.: 21.0 scfm @ 90-100 psig
(compressed air to be clean, dry, and oil free)

EQUIPMENT DATA

Timer(s): T16054/NEMA-4 (M14507)
(electrical reqmts. 120V, 50/60 Hz, 1 phase, 100 w each)
Diaph. Valves: M14909 Bag Cages: C10111
Solenoid Valves: E24104 Bag Clamps: M12803
Venturis: M11038 Bag Cups: M10725
Filter Bags: 16oz. Polyester/singed (B25614)

1 Field Modification derated from 12,000 acfm to 9,500 acfm by changing motor drive sheeves.



E-15-23699-20;



HILLSBOROUGH COUNTY FLORIDA
SOLID WASTE ENERGY RECOVERY PROJECT
MARKED TO REFLECT ASH BLDG. DUST SUPPRESSION BAG HOUSE
SUPPLEMENTAL INFORMATION

NOTE:

PSD-FL-104 WAS
MODIFIED TO BECOME
PSD-FL-121 IN 1987.
SEE FILE FOR PSD-FL-104
FOR INFORMATION PRIOR TO
JUNE 1987.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
PSD PERMIT FOR THE
HILLSBOROUGH COUNTY ENERGY RECOVERY FACILITY
BRANDON, FLORIDA

AGENCY: Environmental Protection Agency.

ACTION: Notice.

SUMMARY: Notice is hereby given that the Prevention of Significant Deterioration (PSD) permit issued to the Hillsborough County Department of Solid Waste on July 7, 1986, became effective on August 11, 1986. The permit was issued for the construction of a 1200 ton per day municipal solid waste incineration facility with electrical generation capability.

DATE: This action is effective as of August 11, 1986, the effective date of the PSD permit. Construction must begin within eighteen (18) months of this date or the permit will become invalid.

ADDRESSES: Copies of the PSD permit, permit application, preliminary and final determinations are available for public inspection upon request at the following locations:

U.S. Environmental Protection Agency
Air Programs Branch
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

FOR FURTHER INFORMATION CONTACT: Wayne Aronson of the EPA Region IV, Air Programs Branch at the Atlanta address given above, telephone (404) 347-4901; (FTS) 257-4901.

SUPPLEMENTAL INFORMATION: On December 13, 1985, the Hillsborough County Department of Solid Waste submitted an application to construct three 400 ton per day municipal solid waste incinerators near Brandon, Florida. The preliminary determination was issued by the Florida Department of Environmental Regulation (DER) on March 25, 1986, and the public comment period commenced on April 7, 1986. The Final Determination was issued by the Florida DER on May 30, 1986. Comments on the determinations were made by both EPA and the Hillsborough County Department of Solid Waste in reference to various permit conditions. No other comments were received during the public comment period.

The federal PSD permit was issued on July 7, 1986, and became effective on August 11, 1986. The effective date of this permit constitutes final Agency action under 40 CFR §124.19(f)(1) and Section 307 of the Clean Air Act, for purposes of judicial review. Under Section 307(b)(1) of the Act, petitions for judicial review of this action must be filed in the United States Court of Appeals for the appropriate circuit by [60 days from today]. This action

may not be challenged later in proceedings to enforce its requirements (see §307(b)(2)). If construction does not commence within eighteen (18) months after the effective date, that is, by February 11, 1988, or if construction is not completed within a reasonable time, the permit shall expire and the authorization to construct shall become invalid.

(Sections 160-169 of the Clean Air Act (42 U.S.C. 7470-7479).)

DATE: SEP - 9 1986

Lee A. DeHihns, III, Deputy

Lee A. DeHihns, III, Deputy
REGIONAL ADMINISTRATOR

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE PREVENTION
OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 USC §7470 et. seq., and the regulations promulgated thereunder at 40 CFR §52.21, as amended at 45 Fed. Reg. 52676, 52735-41, (August 7, 1980).

Hillsborough County Department of Solid Waste

is, as of the effective date of this permit (PSD-FL-104) authorized to construct a stationary source at the following location:

0.6 miles North of State Route 60
between Faulkenburg Road
and the TECO transmission line corridor
in Hillsborough County, Florida

Upon completion of authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Specific Conditions (Part I) and General Conditions (Part II)

This permit is hereby issued on JUL 2 1986
and shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1).

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and local law.

Date Signed

Regional Administrator

PART I

Specific Conditions

1. Emission Limitations

a. Stack emissions from each unit shall not exceed the following:

- (1) Particulate matter: 0.021 grains per dry standard cubic foot corrected to 12% CO₂ (gr/dscf-12%) or 7.0 pounds per hour per unit, whichever is more restrictive.
- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity except that 20% opacity may be allowed for one six-minute period (average of 24 consecutive observations recorded at 15-second intervals) in any one hour. Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by EPA for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited. Opacity of other emission points at the plant shall not exceed 5%.
- (3) VOC: 0.01 gr/dscf-12%, or 0.2 lb/ton, whichever is more restrictive
- (4) SO₂: 0.17 gr/dscf-12% or 3.2 lb/ton, whichever is more restrictive, 24-hour average, 0.45 gr/dscf-12% or 8.5 lb/ton, whichever is more restrictive, 3-hour average
- (5) Nitrogen Oxides: 0.16 gr/dscf-12%, or 3.0 lb/ton, whichever is more restrictive
- (6) Carbon Monoxide: 0.093 gr/dscf-12%, or 1.8 lb/ton, whichever is more restrictive.

- (7) Lead: 0.00104 gr/dscf-12%, or 0.020 lb/ton, whichever is more restrictive.
- (8) Fluorides: 0.0031 gr/dscf-12%, or 0.060 lb/ton, whichever is more restrictive.
- (9) Sulfuric Acid Mist: 0.0040 gr/dscf-12%, or 0.077 lb/ton, whichever is more restrictive.
- (10) Beryllium: 6.8×10^{-7} gr/dscf-12%, or 1.3×10^{-5} lb/ton, whichever is more restrictive.
- (11) Each of the emission limits in conditions (1) and (3) through (10) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (3) through (10) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.
- (12) Mercury: 2200 grams/day
- (13) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. Additionally, all portions of the proposed facility including the ash handling facility which have the potential for fugitive emissions will be enclosed. Also those areas which have to be open for operational purposes, e.g., tipping floor of the refuse bunker while trucks are entering and leaving, will be under negative air pressure.
- (14) Each of the three units is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards

(NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.

- (15) Only natural gas will be used as an auxiliary fuel.

b. Compliance Tests

- (1) Compliance tests for particulate matter, SO₂, nitrogen oxides, CO, VOC, sulfuric acid mist, fluorides, mercury and beryllium shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f), except that an annual test will be conducted for particulate matter. Compliance tests for opacity will be conducted simultaneously during each compliance test run for particulate matter.

Compliance tests shall be conducted for such time and under such conditions as specified by EPA prior to the compliance test. These conditions will be specified by EPA upon notification of performance tests as required by General Condition 1. The permittee shall make available to EPA such records as may be necessary to determine the conditions of the performance tests.

- (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:
- a. Method 1 for selection of sample site and sample traverses
 - b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.

- e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 6 for concentration of SO₂. Two samples, taken at approximately 30 minute intervals, shall constitute one test run.
 - h. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.
 - i. Method 8 for determination of sulfuric acid mist concentration and associated moisture content. One sample shall constitute one test run.
 - j. Method 10 (continuous) for determination of CO concentrations. One sample constitutes one test run.
 - k. Method 12 for determination of lead concentration and associated moisture content. One sample constitutes one test run.
 - l. Method 25 for determination of volatile organic compounds (VOC) concentration. One sample shall constitute one test run.
 - m. Method 13A or 13B for determination of fluoride concentrations and associated moisture content. One sample shall constitute one test run.
 - n. Method 101A for determination of mercury emission rate and associated moisture content. One sample shall constitute one test run.
 - o. Method 104 for determination of beryllium emission rate and associated moisture content. One sample shall constitute one test run.
- (3) The stack tests shall be performed at +10% of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.

2. The height of the boiler exhaust stack shall be 220 feet above ground level at the base of the stack.
3. The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each. 18.3 tons/hr
110%
4. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.
5. The permittee must submit to EPA and DER within fifteen (15) days after it becomes available to the County, copies of technical data pertaining to the incinerator boiler design, to the electrostatic precipitator design, and to the fuel mix that can be used to evaluate compliance of the facility with the preceeding emission limitations.
6. Grease, scum, grit screenings or sewage sludge shall not be charged into the solid waste to energy facility boilers.
7. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to limit particulate emissions to no more than 0.021 grains per dscf corrected to 12% CO₂.

8. Stack Monitoring Program

The permittee shall install and operate continuous monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Rule 17-2.710, FAC, 40 CFR Part 60, Subparts A and D, Sections 60.13 and 60.45 respectively, except that emission rates shall be calculated in units consistent with emission limits in this permit. The conversion procedure shall be approved by EPA.

9. Reporting

- a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office, the Hillsborough County Environmental Protection Commission (HCEPC) and EPA Region IV.
- b. Stack monitoring shall be reported to HCEPC, the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

10. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.

11. Addresses for submitting reports are:

a. EPA - Region IV

Chief, Air Compliance Branch
U.S. Environmental Protection Agency
345 Courtland St.
Atlanta, GA 30365

b. DER

Chief, Compliance and Ambient Monitoring
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

c. Southwest District Office of DER

District Manager
Department of Environmental Regulation
7601 Highway 301 N.
Tampa, FL 33610

d. HCEPC

Chief, Air Group
Hillsborough County Environmental
Protection Commission
1900 9th Ave.
Tampa, FL 33605

12. The facility shall provide space for the future installation, if necessary, of a wet or dry flue gas scrubber.

PART II

General Conditions

1. The permittee shall comply with the notification and record-keeping requirements codified at 40 CFR Part 60, Subpart A, § 60.7.
2. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
3. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide EPA with the following information in writing within five (5) days of such conditions:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission, and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of the aforementioned information does not constitute a waiver of the emission limitations contained within this permit.

4. Any proposed change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that would result in new or increased emissions or ambient air quality impact must be reported to EPA. If appropriate, modifications to the permit may then be made by EPA to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein. Any construction or operation of the source in material variance with the application shall be considered a violation of this permit.

5. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit and EPA of the change in control of ownership within 30 days.
6. The permittee shall allow representatives of the state and local environmental control agency or representatives of the EPA upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Clean Air Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emissions of pollutants; and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
7. The conditions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
SYLVIA KIMBELL
LYDIA MILLER
JIM NORMAN
JAN KAMINIS PLATT
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

RECEIVED

JUL 28 1994

Bureau of
Air Regulation

MEMORANDUM

DATE: July 25, 1994

TO: Teresa Heron

FROM: Jerry Campbell *JC*

SUBJECT: Hillsborough County's Resource Recovery Unit (RRU)

This is in response to Daryl Smith's letter of July 8 requesting an amendment of their PSD permit (PSD-FL-121). They are seeking to change the daily throughput of municipal waste from 1200 to 1320 tons, and to revise the method of demonstrating compliance with this limitation. We have reviewed their request and offer the following comments:

1. We feel the request should be handled pursuant to Rule 17-4.055, F.A.C., thus any additional information should be requested within 30 days of receipt of Mr. Smith's letter. We received it on July 11 and it is our understanding you received it on July 15. We are not sure which "triggers the clock."
2. In order to process the Solid Waste Department's request, we first need to determine which authorization represents the PSD program. You recall the EPA issued the first PSD permit in 1986 after they revoked the State's delegation. That permit (PSD-FL-104) contains a daily throughput limitation on page 1, and contrary to Mr. Smith's opinion, we believe it is enforceable. The permit that Solid Waste requested to amend (PSD-FL-121) was issued by the Department in 1987 and was intended to modify the EPA's. It raised the NOx emission standard and dropped the sulfuric acid mist limit after the RRU failed tests on both. The 1200 TPD throughput limitation was carried forward and the permit #121 expired prior to 1990. The EPA's 1986 permit has no expiration date.

Sometime around 1990, the Department's PSD delegation was revoked again following a TECO court decision. Apparently the way the PPSA was written it took precedence over PSD permits, and the EPA was not satisfied. Because permit PSD-FL-121 was issued during a period when the EPA found Florida's PSD program to be flawed, and it has expired, we believe the EPA would recognize PSD-FL-104 as the only valid PSD permit for the RRU. So if it is the Solid Waste Department's intent to seek authorization to burn more municipal waste, they may need to be seeking to modify PSD-FL-104.

Before we proceed much further, Region IV should be consulted.

3. Regardless of which permit the EPA recognizes as the valid PSD authorization, the request must be handled as a modification. Both PSD-FL-104 and PSD-FL-121 contain a daily limitation, and the Solid Waste Department wants to exceed that figure by another 120 tons. They could either complete a DEP Form 17-1.202(1), F.A.C., with an engineer's seal and fee; or since the PPSA now correctly incorporates the PSD program, they could simply reopen their certification. Either way they would need to address the incremental increase between their current actuals and their new allowables. In this case, we would not want to reward them for exceeding the 1200 TPD limit for the past 8 years, so we may have to adjust their actual emissions down to a level they were authorized to burn. This incremental increase would be used to determine whether nonattainment new source review (VOC and NOx) or PSD (other regulated pollutants) is triggered.
4. They are also requesting a surrogate means of monitoring the amount of waste they burn. We are receptive to the request to use steam flow with one exception. The heat content of the waste is highly variable depending on the amount of the moisture and its makeup. We have been told it can range from 4000 to 5000 BTU per pound of municipal waste (a full 25% over the lower end value). Their proposal is to use a mid-range value of 4500, while we feel a more conservative figure of 4000 should be used. This would ensure that even on a low BTU waste day (typical throughout the rainy season), that the ton per day limitation in the permit was not exceeded.

Below is an illustration of our concern.

Teresa Heron
July 25, 1994
Memorandum
Page 3

Permit Limitation After Modification: 1320 TPD
Compliance Monitoring: 98,388 pounds of steam per hour per boiler
using 4500 BTU per pound of waste

Steam Required

$$3 \text{ units} \times 98,388 \frac{\# \text{ steam}}{\text{unit-hr}} \times 24 \frac{\text{hr}}{\text{day}} = 7,083,936 \frac{\# \text{ steam}}{\text{day}}$$

Scenario #1 - Actual Heat Content of Waste Burned is 4500 BTU per Pound

$$7,083,936 \frac{\# \text{ steam}}{\text{day}} \times \frac{1677 \text{ BTU}}{\# \text{ steam}} \times \frac{\text{Ton Waste}}{2000 \# \text{ Waste}} = 1320 \frac{\text{Tons Waste}}{\text{day}}$$

Scenario #2 - Actual Heat Content of Waste Burned is 4000 BTU per Pound

$$7,083,936 \frac{\# \text{ steam}}{\text{day}} \times \frac{1677 \text{ BTU}}{\# \text{ steam}} \times \frac{\text{Ton Waste}}{2000 \# \text{ Waste}} = 1485 \frac{\text{Tons Waste}}{\text{day}}$$

$\frac{4000 \text{ BTU}}{\# \text{ Waste}}$

Under Scenario #2, the proposed compliance methodology fails to accurately quantify the amount of waste burned. While they would report they complied with a 1320 ton limitation, they would have exceeded this by 165 tons. In fact, they will exceed their limitation on a regular basis during the summer season when the heat content is lower.

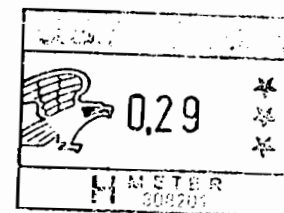
5. We acknowledge that the EPA has proposed to use the 4500 BTU per pound figure and steam flows in their proposed NSPS. It is our understanding, however, that they are simply using it to characterize the incinerator's capacity--not as surrogate for daily throughput. We concur that steam flow may be a more practical means of monitoring the source's potential emissions, but we feel you must not accept a procedure which will routinely underpredicts the amount of waste burned.

Thanks for the opportunity to provide input and please keep us advised.

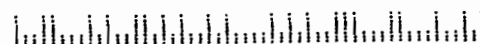
bm

**Environmental Protection Commission
of
Hillsborough County**

1900 9th Avenue
Tampa, Florida 33605



Ms. Teresa Heron
Division of Air Resources Management
Florida Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400



PS Form 3811, July 1983 4-7-845

DOMESTIC RETURN RECEIPT

☐ **SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.

2. ☐ Restricted Delivery.

3. Article Addressed to: Richard W. Seelinger
Ogden Martin Sys. of Hills. Co., Inc.
40 Lane Road, CN 2615
Fairfield, NJ 07007-2615

4. Type of Service: Article Number
☐ Registered ☐ Insured
☒ Certified ☐ COD P 274-007 666
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X *[Signature]*

6. Signature - Agent
X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

P 274 007 666

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Richard W. Seelinger	
Ogden Martin Sys. of Hills.	
Street and No 40 Lane Road, CN 2615	
P.O., State and ZIP Code Fairfield, NJ 07007-2615	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 10/14/87 Fed. Permit: PSD-FL-121	

Final Determination

Hillsborough County, Florida

**Resource Recovery Facility Modification
File No. PSD-FL-121**

**Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting**

October 14, 1987

Final Determination

The application by Hillsborough County, through Ogden Martin Systems of Hillsborough, Inc., to increase the allowable nitrogen oxides (NOx) and sulfuric acid mist (acid mist) emissions at the Resource Recovery Facility in Hillsborough County (HCERF), has been reviewed by the Bureau of Air Quality Management. Public Notice of the Department's Intent to Issue the permit was published in the Tampa Tribune on July 19, 1987.

Comments were received from Bruce Miller, U.S. EPA Region IV; David Dee, attorney for Hillsborough County; and Mr. J. R. Treshler of Ogden Projects, Inc. Although the Department acknowledges that comments concerning the Preliminary Determination help state some issues more clearly, responses will be limited to comments pertaining to the proposed permit. Responses to the comments received are addressed below, on a letter by letter basis.

Letter 1, Hillsborough County (attachment 4)

Comment 6, page 2: Attachment 4 should convey to the County what EPA's view is on the Department's permit processing approach.

Comment 1, page 3: Several specific conditions were repeated from the original permit, PSD-FL-104, in order to maintain continuity on issues pertaining to NOx and acid mist in the proposed permit, PSD-FL-121.

Comments 2, 3, 4, 5, and 6; pages 3 and 4: The Department will make changes in the permit to reflect agreement with these comments.

Letter 2, Ogden Projects (attachment 5)

Comment 1, page 3: The emission increases of NOx, acid mist and particulates are addressed together in the permit overview because they are in the same facility and covered under the same permit.

Comment 2, page 3: The Department will make a change in the permit to make clear the fact that emission limits and compliance testing for acid mist have been deleted in the proposed permit.

Letter 3, U.S. EPA (attachment 6)

The Department agrees with EPA's comments that the proposed permit should state how permit PSD-FL-121 supercedes permit PSD-FL-104 on emission limits for NOx and acid mist. A paragraph will be added to the permit to that effect.

Letter 4, U.S. Department of the Interior (attachment 7)

The Department of the Interior's comment arrived after the closing date of the comment period, however, with the permission of the applicant, DER has reviewed the comment as a courtesy.

DER does not feel that the proposed NOx emission rate of the Hillsborough County RRF shall be compared to other facilities in the State of Florida which incorporate a different type of technology than the Hillsborough facility. In addition, DER is not supportive of setting an emissions limitation which is equivalent to any one test result.

Letter 5, Hillsborough County Environmental Protection Commission (attachment 8)

The Hillsborough County Environmental Protection Commission's comment arrived after the closing date of the comment period. Upon discussing the situation with the applicant, the Department has decided to not include these comments as part of the Final Determination, but will address the comments at a later date by means of a letter.

Listed below are the changes the Department will make in the proposed permit to reflect consideration of the comments received from all the parties, as mentioned earlier.

Changes in Paragraph 2, page 1 of the permit

From:

For the modification of a 1,200 ton per day resource recovery facility to be located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the proposed plant are 368.2 km E and 3092.7 km N.

To:

For the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 km E and 3092.7 km N.

Change in Paragraph 3, page 1 of the permit

From:

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from

this modification. Only specific conditions 1.a.(3), 1.b., and 1.c.(1) have been modified and/or added to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104). The other pollutants emitted from this facility are addressed in the original PSD permit.

To:

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from this modification. Only specific condition 1. has been modified to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104) and also Specific Condition No. 11 has been added. The other pollutants emitted from this facility are addressed in the original PSD permit. This facility is not subject to any emission limitations or testing requirements for sulfuric acid mist. Except as expressly provided in the specific conditions contained herein, all of the other provisions of permit No. PSD-FL-104 remain in effect.

Changes in General Condition No. 13

From:

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

To:

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

Changes in Specific Conditions No. 1.a.(4)

From:

(4) Each of the emission limits in conditions (1) through (3) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (2) and (3) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.

To:

(4) Each of the emission limits in conditions (1) and (3) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (1) and (3) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e., dscf per ton of refuse fired, are different than projected by the applicant, EPA may, at its discretion, determine compliance based upon the lb/ton limits.

Addition to Specific Condition 1.a.

(7) This facility is not subject to any emission limitations or testing requirements for sulfuric acid mist.

Change in Specific Condition 1.c.(2)g

From:

g. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.

To:

g. Method 7E for concentration of nitrogen oxides.

Add Specific Condition No. 11

11. This permit shall supercede the NOx and acid mist emission limitations and testing requirements as contained in permit PSD-FL-104.

Attachments to be Added:

4. Letter from David Dee, attorney for Hillsborough County, dated August 10, 1987.

5. Letter from Ogden Projects, dated August 14, 1987.

6. Letter from U.S. EPA dated September 11, 1987.

7. Letter from U.S. Department of the Interior, dated September 22, 1987.

8. Letter from Hillsborough County Environmental Protection Commission, dated October 2, 1987.

The final action of the Department will be to issue the permit as proposed in the Preliminary Determination with the above mentioned ammendments.

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller 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 **STATE OF FLORIDA DEPARTMENT OF**
PROPOSED AGENCY ACTION ON PERMIT
APPLICATION

was published in said newspaper in the issues of
JULY 19, 1987

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 publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 19th day
of JULY A.D. 1987

Leslie A. Puatta

(SEAL)

Notary Public, State of Florida
My Commission Expires Nov. 23, 1990
Bonded thru Troy Fair Insurance Inc.

Notice of Proposed Agency Action on Permit Application
The Department of Environmental Regulation gives notice of its intent to issue a permit to Hillsborough County to increase the allowable nitrogen oxides, sulfuric acid mist, and particulate emissions from their existing energy recovery (municipal solid waste incineration) facility. The facility is located in Hillsborough County, approximately two miles east of Tampa on the County's Falkenburg Road site. A determination of best available control technology (BACT) was required.

This application was reviewed under Florida Administrative Code Rules 17-2.500, Prevention of Significant Deterioration, Emissions of nitrogen oxides, sulfuric acid mist, and particulates will increase by 739,289, and 7 tons per year, respectively. The allowable emissions of the other pollutants are not being increased. The Department has completed a study of the potential ambient air impact due to the increase in emissions. Based on this study, the Department has reasonable assurance that the increase in emissions will not cause or contribute to an exceedance of the ambient air quality standards for these pollutants. No PSD increment analysis is required for this modification.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, FL 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned to the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32399-2400. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application 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 Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Hillsborough County Environmental Protection Commission
1410 N. 21st Street
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

PERMITTEE:
Hillsborough County
Hillsborough County Courthouse
419 Pierce Street
Tampa, Florida 33602

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988
County: Hillsborough
Latitude/Longitude: 27° 57' 00" N
82° 40' 22" W
Project: Hillsborough County
Resource Recovery Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 km E and 3092.7 km N.

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from this modification. Only Specific Condition No. 1 has been modified to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104) and also Specific Condition No. 11 has been added. The other pollutants emitted from this facility are addressed in the original PSD permit. This facility is not subject to any emission limitations or testing requirements for sulfuric acid mist. Except as expressly provided in the Specific Conditions contained herein, all of the other provisions of permit No. PSD-FL-104 remain in effect.

Attachments:

1. May 1, 1987, letter by Richard W. Seelinger.
2. June 8, 1987, letter by Bruce P. Miller, EPA Region IV.
3. June 12, 1987, letter by J. R. Treshler.
4. Letter from David Dee, attorney for Hillsborough County dated August 10, 1987.
5. Letter from Ogden Projects, dated August 14, 1987.

PERMITTEE:
Hillsborough County

Permit Number: AC PSD-FL-121
Expiration Date: March 31, 1988

6. Letter from U.S. EPA dated September 11, 1987.
7. Letter from U.S. Department of the Interior, dated September 22, 1987.
8. Letter from Hillsborough County Environmental Protection Commission, dated October 2, 1987.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Hillsborough County

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Expiration Date: March 31, 1988

GENERAL CONDITIONS

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Emission Limitations

- a. Stack emissions from each unit shall not exceed the following:
 - (1) Particulate matter: 0.021 grains per dry standard cubic foot corrected to 12% CO₂ (gr/dscf-12%) or 7.0 pounds per hour per unit, whichever is more restrictive.

PERMITTEE:
Hillsborough County

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SPECIFIC CONDITIONS:

- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity except that 20% opacity may be allowed for one six-minute period (average of 24 consecutive observations recorded at 15-second intervals) in any one hour. Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by DER for longer duration.

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited. Opacity of other emission points at the plant shall not exceed 5%.

- (3) Nitrogen Oxides: 0.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive
- (4) Each of the emission limits in conditions (1) and (3) is to be expressed as a 3-hour average. This averaging time, which is applicable to the emission limits for all pollutants, is based on the expected length of time for a particulate compliance test. The concentration standards in conditions (1) and (3) are included as the primary compliance limit to facilitate simpler compliance testing, since the process weight, in tons per hour, is not easily measured. The concentration limit is intended to be equivalent to the lb/ton limit. The concentration limits were derived by dividing the lb/ton limits by the calculated volume of flue gas produced when one ton of refuse is combusted. If actual process conditions, i.e. dscf per ton of refuse fired, are different than projected by the applicant, DER may, at its discretion, determine compliance based upon the lb/ton limits.
- (5) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks.

PERMITTEE:
Hillsborough County

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Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

Additionally, all portions of the proposed facility including the ash handling facility which have the potential for fugitive emissions will be enclosed. Also those areas which have to be open for operational purposes, e.g., tipping floor of the refuse bunker while trunks are entering and leaving, will be under negative air pressure.

- (6) Each of the three units is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards (NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.
- b. Ash handling facility emissions shall not exceed 1.63 pounds per hour.
- c. Compliance Tests

- (1) Compliance tests for particulate matter, and, nitrogen oxides shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f), except that an annual test will be conducted for particulate matter. Compliance tests for opacity will be conducted simultaneously with compliance tests for particulate matter. The compliance test requirements for the ash handling facility shall be waived in accordance with Rule 17-2.700(3)(d), FAC.

Compliance tests shall be conducted for such time and under such conditions as specified by EPA prior to the compliance test. These conditions will be specified by DER upon notification of performance tests as required by General Condition 1. The permittee shall make available to DER such records as may be necessary to determine the conditions of the performance tests.

- (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:
 - a. Method 1 for selection of sample site and sample traverses.

PERMITTEE:
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Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

- b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.
 - e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 7E for concentration of nitrogen oxides.
- (3) The stack tests shall be performed at +10% of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.
- 2. The height of the boiler exhaust stack shall not be less than 220 feet above ground level at the base of the stack.
 - 3. The boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.
 - 4. The boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

5. Grease, scum, grit screenings or sewage sludge shall not be charged into the solid waste to energy facility boilers.

6. Electrostatic Precipitator

The electrostatic precipitator shall be designed and constructed to limit particulate emissions to no more than 0.021 grains per dscf corrected to 12% CO₂.

7. Stack Monitoring Program

The permittee shall install and operate continuous monitoring devices for stack oxygen and opacity. The monitoring devices shall meet the applicable requirements of Rule 17- 2.710, FAC, 40 CFR Part 60, Subparts A and D, Sections 60.13 and 60.45 respectively, except that emission rates shall be calculated in units consistent with emission limits in this permit. The conversion procedure shall be approved by DER.

8. Reporting

- a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the DER Southwest Florida District Office, the Hillsborough County Environmental Protection Commission (HCEPC) and EPA Region IV.
- b. Stack monitoring shall be reported to HCEPC, the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR, Part 60, Subsection 60.7.

9. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not sludge from sewage treatment plants as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.

PERMITTEE:
Hillsborough County

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

10. This permit shall supercede the NOx and acid mist emission limitations and testing requirements as contained in permit PSD-FL-104.

Issued this 14 day of Oct., 1987

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


Dale Twachtman, Secretary

ATTACHMENT 4

CARLTON, FIELDS, WARD, EMMANUEL, SMITH, CUTLER & KENT, P. A.

ATTORNEYS AT LAW

ONE HARBOUR PLACE
P. O. BOX 3239
TAMPA, FLORIDA 33601
(813) 223-7000

CNA BUILDING
P. O. BOX 1171
ORLANDO, FLORIDA 32802
(305) 849-0300

200 EAST GOVERNMENT ST.
P. O. BOX 12426
PENSACOLA, FLORIDA 32582
(904) 434-0142

FIRST FLORIDA BANK BUILDING
P. O. DRAWER 190
TALLAHASSEE, FLORIDA 32302
(904) 224-1585

FLORIDA NATIONAL BANK TOWER
P. O. BOX 4700
JACKSONVILLE, FLORIDA 32201
(904) 354-1600

DER

AUG 11 1987

BAQM

PLEASE REPLY TO:

August 10, 1987

Tallahassee

Clair H. Fancy
Deputy Chief
Bureau of Air Quality Management
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Hillsborough County resource recovery facility;
DER File No. PSD-FL-121

Dear Mr. Fancy:

This law firm represents Hillsborough County in the above-referenced case. On behalf of Hillsborough County, we are submitting the following comments concerning the Intent to Issue, Technical Evaluation, Preliminary Determination and draft permit issued by the Department of Environmental Regulation (DER) on July 14, 1987.

For the purposes of this submittal, words which have been underlined should be added to the draft document. Words which have been stricken should be deleted.

Intent to Issue

Page 1, paragraph 2, should state that the County applied for a permit modification for "particulate emissions from the existing refuse to energy facility"

Technical Evaluation and Preliminary Determination

1. Page 1, paragraph 1. Hillsborough County believes that its first PSD permit was properly issued pursuant to the Florida Electrical Power Plant Siting Act. The County does not agree

Clair Fancy
August 10, 1987
Page Two

with the statements in the Preliminary Determination which suggest that the Florida PSD regulations, State Implementation Plan, Power Plant Siting Act, or original Hillsborough County PSD permit were not valid.

2. Page 1, paragraph 1. For purposes of completeness, the Preliminary Determination should discuss the PSD permit (PSD-FL-104) that was issued by the United States Environmental Protection Agency (EPA). Specifically, a preliminary determination was prepared and public comments were solicited by DER on April 6, 1986. DER issued a final determination and recommended issuance of the permit on May 21, 1986. A second PSD permit (PSD-FL-104) for the County's facility was issued by EPA on July 7, 1986.

3. Page 2, paragraph 1. The Preliminary Determination should state that the resource recovery facility has been built. It is no longer a "proposed" project.

4. Page 2, paragraph 2. The Preliminary Determination should be revised to show that "The ERF is ~~will~~ be located . . ." near Faulkenberg Road. Since the site has been the scene of construction activity for the last 2 $\frac{1}{2}$ years, DER should delete the statement that "[t]he site has been recently used as improved pasture for cattle grazing."

5. Page 2, paragraph 3. "The ~~proposed~~ site of the Hillsborough County ERF" is in an area designated as nonattainment for ozone.

6. Pages 2-3, Section II, Rule Applicability. Hillsborough County has requested modifications to certain permit conditions for the resource recovery facility. In the Preliminary Determination, DER classified the County's request as a major modification to a major source. We are not sure whether EPA will agree with DER's decision. Since we have had problems in the past with EPA's approvals of this project, we would like to ensure that EPA approves the proposed DER procedure and decision in this case. Accordingly, we respectfully request the Department to obtain a letter or other written statement from EPA acknowledging that: (a) DER's characterization of the County's request is appropriate; (b) DER followed the proper procedure when evaluating the County's request; and (c) DER's decision is appropriate. We believe this issue is extremely important because we do not want EPA to subsequently challenge the Department's activities in this case.

Clair Fancy
August 10, 1987
Page Three

7. Page 8, paragraph 3, Modelling Methodology. It should be noted that the prior modelling for the facility utilized a conservative approach. The stack parameters and emission rates were based on a maximum facility capacity of 1,760 tons per day and 100% facility availability. As currently constructed, however, the plant will normally handle approximately 1200 tons per day. In addition, it is generally assumed that resource recovery facilities will only be available approximately 85% of the time.

8. Page 10, paragraph 2. The predicted maximum ambient air quality impact for the proposed emissions of NO_x is 1 ug/m³. The preliminary determination incorrectly states that the impact will be 11 ug/m³.

Draft PSD Permit

1. We are concerned about DER's plan to issue a new permit (PSD-FL-121), rather than modify the existing PSD permit (PSD-FL-104). We believe it would be simpler for DER to issue a permit modification that only addresses the specific changes that will be affected by the Department's proposed action. Accordingly, we believe it is unnecessary for the Department to repeat all of the general conditions and specific conditions that have been incorporated into the draft PSD permit (PSD-FL-121). For ease of reference, we have prepared a draft permit and attached it as Exhibit A.

2. Page 1, paragraph 3. The draft permit should expressly state that the emissions limits and testing protocol for sulfuric acid mist have been deleted. As written, the draft permit appears to include the emission limits and testing methods for sulfuric acid mist.

3. Page 4, paragraph 13. All three of the appropriate spaces should be marked to signify that this permit constitutes a determination of BACT, PSD, and NSPS.

4. Page 6, paragraph (4). This requirement should be modified as follows:

Each of the emission limits in conditions (1) and through (3) is to be expressed as a three hour average . . . The concentration standards in conditions (1) {2} and (3) are included as the primary compliance limit

Clair Fancy
August 10, 1987
Page Four

5. Page 7. A new paragraph 1.a.(7) should be added. It should expressly state that the emission limitation for sulfuric acid mist has been deleted.

6. Page 8, paragraph 1.c.(2)g. Method 7E should be used to determine compliance for nitrogen oxides rather than Method 7.

Please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "David S. Dee". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Dee".

David S. Dee

cc: Bill Thomas
Daryl Smith
Joe Mount
Emmy Acton
Richard Seelinger
Bob Hauser
Don Elias
Bill Gillen

DSD/vc:Hills-RR

EXHIBIT A

DRAFT PSD PERMIT MODIFICATION
FOR HILLSBOROUGH COUNTY RESOURCE RECOVERY FACILITY
(PSD-FL-104)

Page 1, Paragraph 3

This modification to Permit No. PSD-FL-104 addresses the increased emissions of nitrogen oxides and sulfuric acid mist from the stack at the resource recovery facility. It also addresses the particulate emissions from the ash residue facility and dust suppression baghouse. Except as expressly provided in the specific conditions contained herein, all of the other provisions of Permit No. PSD-FL-104 remain in effect.

Specific Conditions

1. Specific Condition 1.a.(5) in Permit No. PSD-FL-104 establishes an emission limitation for nitrogen oxides. It is modified to read as follows:

 (5) Nitrogen Oxides: 0.34 gr/dscf-12%, or 6.4 lb/ton, whichever is more restrictive.
2. Specific Conditions 1.a.(9) and 1.b.(2)i concerning sulfuric acid mist emission limitations and compliance test requirements are deleted.
3. Pursuant to Rule 17-2.700(3)d, FAC, a standard of 5% opacity is hereby set for the minor particulate source control equipment/baghouse (i.e., the ash residue building dust suppression system). The compliance test requirements for the ash handling facility will be waived in accordance with Rule 17-2.700(3)d, FAC.

DSD/vc:Hills-RR2

Copied: CHF/BT

Barry Andrews

8/12/87

my

ATTACHMENT 5

OGDEN MARTIN SYSTEMS
OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2015
FAIRFIELD, NEW JERSEY 07007-2015
(201) 882-9000

AN OGDEN COMPANY

TELECOPIED & SENT FEDERAL EXPRESS

August 14, 1987

HC-0918L
C-1005

DER
AUG 17 1987
BAQM

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
State of Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Permit No. PSD-FL-121
Expiration Date: March 31, 1988
County: Hillsborough
Project: Hillsborough County Resource
Recovery Facility

Dear Mr. Fancy:

Ogden Martin Systems of Hillsborough, Inc. (OMSH) offers the following comments regarding the technical evaluation and preliminary determination in the draft permit to increase the allowable nitrogen oxides, sulfuric acid mist, and particulate emissions from the Resource Recovery Facility in Hillsborough County, Florida. Under Section I, of the Technical Evaluation and Preliminary Determination titled "Introduction," in paragraph two, OMSH would suggest changing the first sentence to read as follows:

On May 1, 1987, Hillsborough County through Ogden Martin Systems of Hillsborough, Inc., applied to DER to increase the allowable nitrogen oxides (NO_x), and sulfuric acid mist emissions at the Hillsborough County ERF.

OMSH would similarly suggest changing the last sentence on the first page to read:

Subsequently, on June 16, 1987, Hillsborough County through Ogden Martin Systems of Hillsborough, Inc., submitted an application to operate/construct dust suppression equipment that was added to the final design of the ash handling building to ensure that there would be no visible emissions from this plant area.

Mr. C. H. Fancy, P.E.
August 14, 1987
Page Two

On the second page of the Introduction, OMSH would suggest deleting paragraph one in its entirety, since the wording is somewhat misleading. The paragraph refers to "the proposed project" whereas the project has been completed. The existing project consists of three boilers. The fourth boiler may or may not be added in the future; but, in any event, it has nothing to do with the original permit or any modification to date. If the paragraph is not deleted in its entirety, it is suggested that the second sentence of the paragraph be changed to read as follows:

A future plant expansion could increase the total solid waste processing capacity of the plant to 1600 TPD.

Under Section IV, captioned "BACT Determination," OMSH would propose changing the second sentence of the first paragraph to read as follows:

The ERF is designed to burn up to 1200 tons per day (TPD) of refuse at a heating value of 4500 BTU's per pound, which amount will increase or decrease, respectively, based upon lower or higher heating values, in each case, resulting in an electrical generating capacity of 29 megawatts.

The reason for this suggested change is that it more adequately reflects the burning capabilities of the facility, inasmuch as tonnage put through the unit decreases with higher heating value, and increases with lower heating value. The new recommended language more accurately reflects the capacity.

In the second paragraph under part IV, at the top of the page, it is recommended that the word "modified" be inserted in front of PSD.

Under Part V, captioned "Air Quality Analyses" in the subsection captioned "Analysis of Existing Air Quality," there is a major typographical error in the last paragraph in line two. The second sentence of the last paragraph should read"

This value (1 ug/m³)

Our copy has an 11 instead of a 1. The value is correct in Table V-2, but needs to be corrected in the explanatory comments.

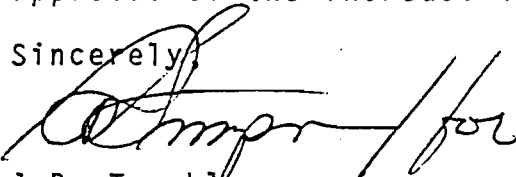
Mr. C. H. Fancy, P.E.
August 14, 1987
Page 3

OMSH recommends that paragraph three of the first page of the permit itself be reworded to segregate particulates from nitrogen oxides and sulfuric acid mist, in order to reflect that these pollutants are emitted from different parts of the plant. It is recommended that the first sentence be reworded to read as follows:

This permit modification pertains to the increases of nitrogen oxides and sulfuric acid mist from the stack and the emission of particulates from the ash residue dust suppression baghouse.

The second sentence of the third paragraph on the first page of the permit needs to be reworded to reflect acceptance of the increased emissions for sulfuric acid mist. As the second sentence presently reads, only specific conditions 1.a.(3), 1.b., and 1.c.(1), are being modified. None of these sections deals with emissions of sulfuric acid mist. Since the third sentence states that all conditions other than the specific conditions addressed in paragraph two remain unchanged, the combination of the second and third sentences does not reflect approval of the increase in sulfuric acid mist.

Sincerely,



J.R. Treshler
Senior Project Manager

JRT:hn

cc: Mr. Bill Thomas

ATTACHMENT 6



Attachment 4

Best Available Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 18 1987

DER

SEP 18 1987

BAQM

4APT/APB-aes

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-2400

Re: Hillsborough County PSD-FL-120

Dear Mr. Fancy:

This is to acknowledge receipt of your July 14, 1987, PSD preliminary determination modifying emissions limits for sulfuric acid mist and nitrogen oxides, and the addition of particulate emission limits for the newly proposed ash handling emission control equipment.

We concur with your determination and permit conditions as indicated. However, the determination should make clear that the significant net emissions increase in nitrogen oxides and sulfuric acid mist for which this source is undergoing PSD review are not the result of a physical change or change in operation at the facility. The "Rule Applicability" section of the determination should provide explanation that the increases are requested permit modifications due to an error in estimating emissions in the construction permit application and that permit modifications resulting in significant net emissions increases require the issuance of a PSD permit. Although this modification requires that a BACT determination be performed for nitrogen oxides and sulfuric acid mist, the determination may consist of the previous BACT determination contained in the original EPA issued PSD permit without further evaluation of present BACT determinations (e.g. acid gas controls). This allowance is made due to the fact that emissions increases are not a result of a physical change in the plant or its operation, and are not due to the failure of prescribed pollution control equipment required in the EPA issued PSD permit.

Please note that the FDER issued PSD permit (PSD-FL-120) will supersede the emission limits for nitrogen oxides and sulfuric acid mist, as contained in the original EPA issued PSD permit (PSD-FL-104). Once the FDER PSD permit is issued, the facility will no longer be required to meet the nitrogen oxides, and sulfuric acid emissions limits contained in the EPA PSD permit PSD-FL-104 for reasons cited in your final determination.

We request that you submit copies of the final determination, which will address our concerns above, and permit when they are issued. If you have any questions, you may contact me or Wayne J. Aronson of my staff at (404) 347-2864.

Sincerely,

Wayne J. Aronson / Acting for

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. Roger P. Stewart, Director
Hillsborough County Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

Mr. William A. Gillen, Jr.
P.O. Box 3324
Tampa, Florida 33601

Copies: *Clair Jancy*
Barry Andrews
Produce Label } 9/21/87 *(m)*

ATTACHMENT 7



United States Department of the Interior
FISH AND WILDLIFE SERVICE

IN REPLY REFER TO:

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

SEP 22 1987

DER
SEP 28 1987
BAQM

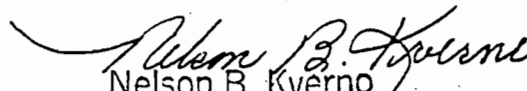
Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

We appreciate the opportunity to review and comment on the Technical Evaluation and Preliminary Determination for the proposed modification of the Prevention of Significant Deterioration permit for the Hillsborough County Resource Recovery facility. The Hillsborough County facility, located near Tampa, Florida, is approximately 80 km south of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service. Although we do not expect resulting emission increases from the proposed permit modifications to significantly impact the air quality or air quality related values of the refuge, we have several comments regarding the proposed modifications. These comments are discussed in the enclosed technical review document.

If you have any questions regarding our comments please contact Wayne King of our Air Quality staff at 303-969-2806.

Sincerely,


Nelson B. Kverno
Acting Regional Director

Enclosure

copied:

B. Andrews

T. Rogers

P. Raval

E. Campbell, HCEPC

CHF/BT

9-24-87 RBN

Technical Review of the Hillsborough County
Resource Recovery Facility Permit Modifications

The Hillsborough County Resource Recovery Facility (RRF) was originally granted a Prevention of Significant Deterioration (PSD) permit in July 1986 and consists of a mass burn boiler which can burn up to 1200 tons per day (TPD) of solid municipal waste. The Hillsborough County facility is located near Tampa, Florida, approximately 80 km south of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service. The steam from the boiler would be sent to a turbine generator with a capacity of 29 megawatts (gross). Generated electricity would be transmitted to the Tampa Electric Company for distribution. Hillsborough County is now requesting an increase in the permitted nitrogen oxide (NO_x) and sulfuric acid mist (H_2SO_4) emission limitations. The permitted, requested, and resulting emission increases are as follows:

<u>Pollutant</u>	<u>Permitted (TPY)*</u>	<u>Requested (TPY)</u>	<u>Increase (TPY)</u>
NO_x	657	1396	739
H_2SO_4	17	306	289

*Tons Per Year

Based on the proposed emission increases, the requested modification of the Hillsborough County RRF permit constitutes a major modification of an existing major source and is subject to PSD review. Although we do not expect resulting emission increases from the proposed permit modifications to significantly impact the air quality or air quality related values of the refuge, we have several comments regarding the proposed modifications. These comments are discussed below.

The Hillsborough facility was initially issued a PSD permit which limited the emissions of NO_x and H_2SO_4 to 0.16 grains per dry standard cubic foot (gr/dscf) and 0.0040 gr/dscf corrected to 12% CO_2 , respectively. Hillsborough County's request to modify the NO_x and H_2SO_4 emission limitations is based on test data that were unavailable at the time the permit was issued. Based on these data, Hillsborough County claims that they will be unable to meet the permitted NO_x and H_2SO_4 levels. Consequently, Hillsborough County has proposed that the NO_x limitation be increased from 0.16 gr/dscf to 0.34 gr/dscf, and the H_2SO_4 limitation be increased from 0.004 gr/dscf to 0.072 gr/dscf. The State of Florida has agreed to raise the NO_x limitation to 0.34 gr/dscf, or 6.4 lb NO_x /ton of refuse burned, whichever is more restrictive. For H_2SO_4 , the State is deleting the emission limitation altogether based on the recommendation by EPA Region 4 that because no acceptable test method exists for measuring H_2SO_4 emissions from municipal solid waste incinerators, an emission limitation should not be specified in the permit.

Review of the NO_x emission test data provided by Hillsborough County shows that similar resource recovery facilities have NO_x concentrations similar to the preliminary test results at the Hillsborough County facility. For example, the Wurzburg facility tested at 318 ppm and the Stockholm facility tested at 311 ppm, compared to 327 ppm for the Hillsborough County facility. However, as a basis for the revised NO_x limitation, it appears Hillsborough County selected the permitted rate applicable to the Tulsa facility (404 ppm).

In addition, three other proposed mass burn resource recovery facilities, Broward South, Broward North, and Lake County, were recently permitted by the State of Florida at 5.0 lb NO_x/ton refuse burned. The 327 ppm concentration obtained from preliminary test results at the Hillsborough County facility converts to approximately 5.2 lb NO_x/ton of refuse burned, whereas the proposed 404 ppm limitation corresponds to 6.4 lb/ton. The proposed limitation for the Hillsborough County facility appears to be inconsistent with the preliminary test data from the facility and three other recent permitting decisions by the State which limited facilities to 5.0 lb/ton.

In conclusion, based on the information provided in the Technical Evaluation and Preliminary Determination for the modification of the Hillsborough County RRF permit, we recommend that the revised NO_x permit limit be based on (1) the preliminary test results of the Hillsborough facility of 5.2 lbs NO_x/ton refuse burned (327 ppm), or (2) the permitted NO_x emission limits set for the Broward South, Broward North and Lake County facilities (5.0 lbs NO_x/ton refuse burned). Another option available to the State is to leave the permit as it is until actual emission data from the facility are available. Rather than basing the revised NO_x limit on emissions data from other facilities or preliminary test results from the Hillsborough County facility, the State could wait until the Hillsborough facility achieves normal operation and conducts stack testing, and then modify the permit accordingly.

ATTACHMENT 8

Best Available Copy

COMMISSION
RODNEY COLSON
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
HAVEN POE
JAMES D. SELVEY
PICKENS C. TALLEY II



ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

October 2, 1987

Mr. Clair Fancy, P.E., Deputy Chief
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Hillsborough County RRF
RE: Proposed PSD Permit No. PSD-FL-121

Dear Mr. Fancy:

Thank you for still allowing our Agency the opportunity to comment on the Bureau's proposed permit for our county's resource recovery facility at Faulkenburg Road.

Our comments on the proposed permit are as follows:

1. Proposed specific condition 1.b. states PM emissions from the ash handling facility shall not exceed 1.63 pounds per hour. Furthermore, condition 1.c.(1) mentioned Method 5 requirements on this source are waived by limiting the emissions to 5% opacity pursuant to Section 17-2.700(3)(d), F.A.C..

We recommend the above statements be changed to read:

1.b. In accordance with Subsection 17-2.650(2)(c)11., b., F.A.C., the maximum allowable emissions for the ash handling baghouse based on design flow of 9500 ACFM shall not exceed:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Limitation</u>
Particulate Matter	2.44	10.7	0.03 gr/dscf

Visible Emissions

None (visible emissions less than or equal to 5% opacity)

1.c.(1) Change last sentence of first paragraph to:
"EPA Method 5 testing requirements on the ash handling baghouse exhaust shall be waived pursuant to Section 17-2.700(1)(d)6., F.A.C."

DER

OCT 5 1987

BAOM

Add the following to Section II. A. 3. as 'd'.

This baghouse shall be tested for visible emissions within 30 days of issuance of this permit and annually thereafter. The DER Method #9 test interval on this source shall be thirty (30) minutes. Two copies of the test data shall be submitted to the Air Section of the Environmental Protection Commission of Hillsborough County within 45 days of testing.

The above conditions are being recommended to clearly indicate the source is in a non-attainment area for particulates. As such, RACT requirements should be implemented. Furthermore, since no compliance test has yet been conducted on this baghouse, another sentence was added to require an annual Method 9 on the baghouse.

2. We recommend specific condition 9.b. be revised to require the permittee to submit quarterly reports within a certain time frame. Locally, we require all sources subject to 40 CFR 60.7 to submit excess emissions reports no later than 30 days from the end of each calendar quarter. We recommend this same time frame be used.

3. Specific condition 8 indicates annual compliance testing requirements are required for particulate matter and opacity. The operating permit for City of Tampa's RTE facility requires annual compliance testing requirements for particulate matter, opacity, SO₂, NO_x, and lead. Due to the varying nature of the garbage being burned, there is potential for SO₂, NO_x, and lead emissions to vary significantly from the results of the initial tests. Further, we feel it would be unfair to require different annual compliance tests between our two refuse to energy facilities. Both should have uniform testing requirements. We recommend condition 8 include annual testing requirements for SO₂, NO_x, and lead.

Your consideration of our input is appreciated. Please call me or Jerry Campbell if you have any questions.

Sincerely,



Victor San Agustin
Senior Air Permitting Engineer
Environmental Protection Commission
of Hillsborough County

Radeep Raval

cc:

Bill Thomas, CAPS/CHF, CAPS } 10/5/87
Barry Andrews, BAQM
Bill Thomas, SWFDER

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

TO: Dale Twachtmann
THRU: Howard Rhodes *HW*
FROM: Clair Fancy *CF*
DATE: October 13, 1987
SUBJ: Approval of Hillsborough County Resource
Recovery Facility
Federal Permit Number: PSD-FL-121

Attached for your approval and signature is a permit for the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site in Hillsborough County, Florida. There were comments received during the public notice period.

Day 90 after which these permits will be issued by default is December 11, 1987.

The Bureau recommends approval and signature.

CHF/MJ/s

attachment

COMMISSION
RODNEY COLSON
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
HAVEN POE
JAMES D. SELVEY
PICKENS C. TALLEY II



PM
Federal Express
Airbill # 676269086
10/2/87(2)

ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

October 2, 1987

Mr. Clair Fancy, P.E., Deputy Chief
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Hillsborough County RRF
RE: Proposed PSD Permit No. PSD-FL-121

Dear Mr. Fancy:

Thank you for still allowing our Agency the opportunity to comment on the Bureau's proposed permit for our county's resource recovery facility at Faulkenburg Road.

Our comments on the proposed permit are as follows:

1. Proposed specific condition 1.b. states PM emissions from from the ash handling facility shall not exceed 1.63 pounds per hour. Furthermore, condition 1.c.(1) mentioned Method 5 requirements on this source are waived by limiting the emissions to 5% opacity pursuant to Section 17-2.700(3)(d), F.A.C..

We recommend the above statements be changed to read:

1.b. In accordance with Subsection 17-2.650(2)(c)11., b., F.A.C., the maximum allowable emissions for the ash handling baghouse based on design flow of 9500 ACFM shall not exceed:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Limitation</u>
Particulate Matter	2.44	10.7	0.03 gr/dscf

Visible Emissions

None (visible emissions less than or equal to 5% opacity)

1.c.(1) Change last sentence of first paragraph to: "EPA Method 5 testing requirements on the ash handling baghouse exhaust shall be waived pursuant to Section 17-2.700(1)(d)6., F.A.C."

DER

OCT 5 1987

BAQM

BEST AVAILABLE COPY

FEDERAL EXPRESS

USE THIS AIRBILL FOR DOMESTIC SHIPMENTS AND FOR SHIPMENTS FROM PUERTO RICO TO THE U.S.A.
FILL OUT PURPLE AREAS. FOR ASSISTANCE, CALL 800-238-5355 TOLL FREE.
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS.

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

DATE

1149-3914-5

10/1/87

From (Your Name) VICOR SAN AGUSTIN		Your Phone Number (Very Important) 704-418-1344	
Company EPC INC		Department/Floor No. 3rd Floor	
Street Address 410 N. 1ST STREET		Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result In Extra Charge.) 410 N. 1ST STREET	
City TALLAHASSEE		State FLORIDA	
AIRBILL NO. 676269086		ZIP Street Address Zip Required (No P.O. Box Zip Code) 32301	

<p>YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE)</p> <p>HECKER, FRANKLIN, JR. PERMIT COMMENTS</p>				<p>HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS STATION: Street Address (See Service Guide or Call 800-238-5355)</p>				<p>Federal Express Use</p> <p>Base Charges</p>			
<p>PAYMENT <input checked="" type="checkbox"/> Bill Shipper <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card</p> <p><input type="checkbox"/> Cash <input type="checkbox"/> FedEx Acct. No. or Major Credit Card No.</p>				<p>City: Tallahassee State: FL</p>				<p>Declared Value Charge</p>			
<p>4 SERVICES CHECK ONLY ONE BOX</p> <p>1 <input type="checkbox"/> PRIORITY 1 Overnight Delivery Using Your Packaging</p> <p>2 <input type="checkbox"/> COURIER-Pak Overnight Envelope</p> <p>3 <input type="checkbox"/> OVERNIGHT DELIVERY USING OUR PACKAGING</p> <p>4 <input type="checkbox"/> STANDARD AIR</p> <p>5 <input type="checkbox"/> SERVICE COMMITMENT</p>				<p>DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED</p> <p>1 <input type="checkbox"/> HOLD FOR PICK-UP Give the Federal Express address where you want package held in Section II at right.</p> <p>2 <input checked="" type="checkbox"/> DELIVER WEEKDAY</p> <p>3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge applies)</p> <p>4 <input type="checkbox"/> RESTRICTED ARTICLES SERVICE (R-A) and Standard Air Packages only. (Extra charge applies).</p> <p>5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge applies)</p> <p>6 <input type="checkbox"/> DRY ICE</p> <p>7 <input type="checkbox"/> OTHER SPECIAL SERVICE</p> <p>8 <input type="checkbox"/> SATURDAY PICK-UP OR SATURDAY DROP-OFF (Extra charge applies)</p>				<p>Emp. No. 39532 Date 10/1/87</p> <p><input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party</p> <p>Street Address: City: Tallahassee State: FL Zip: 32301</p> <p>Received By: X Date/Time Received: 10/1/87</p>		<p>Origin Agent Charge</p> <p>Other</p> <p>Total Charges</p>	
<p>PACKAGES WEIGHT YOUR DECLARED VALUE OVER SIZE</p>				<p>Received At Shipper's Door <input type="checkbox"/> Regular Stop <input type="checkbox"/> On-Call Stop <input type="checkbox"/> FedEx Loc.</p> <p>Federal Express Corp. Employee No. 39532</p> <p>Date/Time For Federal Express Use 10/1/87</p>				<p>Part #2041788900 FEC-S-750-25 REVISION DATE 2/85 PRINTED U.S.A. NCR</p>			

RECIPIENT'S COPY

Add the following to Section II, A, 3. as 'd'.

This baghouse shall be tested for visible emissions within 30 days of issuance of this permit and annually thereafter. The DER Method #9 test interval on this source shall be thirty (30) minutes. Two copies of the test data shall be submitted to the Air Section of the Environmental Protection Commission of Hillsborough County within 45 days of testing.

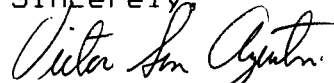
The above conditions are being recommended to clearly indicate the source is in a non-attainment area for particulates. As such, RACT requirements should be implemented. Furthermore, since no compliance test has yet been conducted on this baghouse, another sentence was added to require an annual Method 9 on the baghouse.

2. We recommend specific condition 9.b. be revised to require the permittee to submit quarterly reports within a certain time frame. Locally, we require all sources subject to 40 CFR 60.7 to submit excess emissions reports no later than 30 days from the end of each calendar quarter. We recommend this same time frame be used.

3. Specific condition 8 indicates annual compliance testing requirements are required for particulate matter and opacity. The operating permit for City of Tampa's RTE facility requires annual compliance testing requirements for particulate matter, opacity, SO₂, NO_x, and lead. Due to the varying nature of the garbage being burned, there is potential for SO₂, NO_x, and lead emissions to vary significantly from the results of the initial tests. Further, we feel it would be unfair to require different annual compliance tests between our two refuse to energy facilities. Both should have uniform testing requirements. We recommend condition 8 include annual testing requirements for SO₂, NO_x, and lead.

Your consideration of our input is appreciated. Please call me or Jerry Campbell if you have any questions.

Sincerely,



Victor San Agustin
Senior Air Permitting Engineer
Environmental Protection Commission
of Hillsborough County

Bradley Raval

cc:

Bill Thomas, CAPS/CNF/CAPS

Barry Andrews, BAQM

Bill Thomas, SWFDER

} 10/5/87

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000



AN OGDEN COMPANY

October 1, 1987

HC-0964L
C-1005

Ms. Maggie Janes
State of Florida
Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DER
OCT 2 1987
BAQM

Subject: Original Affidavit and Public Notice

Dear Ms. Janes:

Please find enclosed the original Affidavit and Public Notice as it appeared in the Tampa Tribune 7/19/87 for the Hillsborough County Solid Waste Energy Recovery Project PSD Permit.

We thank you for bringing this matter to our attention.

Very truly yours,


J. R. Treshler
General Manager
Project Development
and Operations

JRT:hn
Attachment

cc: File 5.1

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough

ss.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller 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 STATE OF FLORIDA DEPARTMENT OF
PROPOSED AGENCY ACTION ON PERMIT
APPLICATION

was published in said newspaper in the issues of
JULY 19, 1987

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 publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 19th day
of JULY, A.D. 1987.

Leslie A. Puatta

(SEAL)

Notary Public, State of Florida
My Commission Expires Nov. 23, 1990
Bonded Thru Troy Fair - Insurance Ins.

The application 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
Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental
Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
Hillsborough County
Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605
Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as at the Department's Tal-
lahassee address. All comments
mailed within 30 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.
3268 7/19/87

State of Florida
Department of
Environmental Regulation
Notice of Proposed Agency
Action on Permit Application
The Department of Environ-
mental Regulation gives notice
of its intent to issue a per-
mit to Hillsborough County to
increase the allowable
nitrogen oxides, sulfuric acid
mist, and particulate
emissions from their existing
energy recovery (municipal
solid waste incineration) facil-
ity. The facility is located in
Hillsborough County, approxi-
mately two miles east of
Tampa on the County's
Tolkenburg Road site. A de-
termination of best available
control technology (BACT)
was required. This applica-
tion was reviewed under Florida Adminis-
trative Code Rules 17-2.500,
Prevention of Significant
Deterioration. Emissions of
nitrogen oxides, sulfuric acid
mist, and particulates will in-
crease by 739,289 and 7 tons
per year, respectively. The al-
lowable emissions of the other
pollutants are not being in-
creased. The Department has
completed a study of the po-
tential ambient air impact due
to the increase in emissions.
Based on this study, the De-
partment has reasonable as-
surance that the increase in
emissions will not cause or
contribute to an exceedance
of the ambient air quality stan-
dards for these pollutants. No
PSD increment analysis is re-
quired for this modification.
Persons whose substantial
interests are affected by the
Department's proposed permit-
ting decision may petition for
an administrative proceeding
(hearing) in accordance with
Section 120.57, Florida Stat-
utes. The petition must con-
form to the requirements of
chapters 17-103 and 28-5, Flori-
da Administrative Code, and
must be filed (received) in the
Office of General Counsel of
the Department at 2600 Blair
Stone Road, Twin Towers Of-
fice Building, Tallahassee, Fl
32399-2400, within fourteen
(14) days of publication of this
notice. Failure to file a request
for hearing within this time
period shall constitute a waiver
of any right such person
may have to request an ad-
ministrative determination
(hearing) under Section 120.57
Florida Statutes. If a peti-
tion is filed, the ad-
ministrative hearing process
is designed to formulate agen-
cy action. Accordingly, the
Department's final action may
be different from the position
taken by it in this preliminary
statement. Therefore, persons
who may not object to the pro-
posed agency action may
wish to intervene in the pro-
ceeding. A petition for inter-
vention must be filed pursuant
to Model Rule 28.5.207 of the
Florida Rules of Civil Procedure
within five (5) days before the final
hearing and be filed with the
hearing officer. If one has been
assigned to the Division of
Administrative Hearings, De-
partment of Administration,
2009 Apalachee Parkway, Tal-
lahassee, Florida 32399-2400. If
no hearing officer has been
assigned, the petition is to be
filed with the Department's
Office of General Counsel,
2600 Blair Stone Road, Tal-
lahassee, Florida 32399-2400.
Failure to petition to intervene
within the allowed time frame
constitutes a waiver of any
right such person has to re-
quest a hearing under Section
120.57, Florida Statutes.

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida } 58.
County of Hillsborough

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller 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 STATE OF FLORIDA DEPARTMENT OF
PROPOSED AGENCY ACTION ON PERMIT
APPLICATION

was published in said newspaper in the issues of
JULY 19, 1987

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 publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 19th day
of JULY A.D. 1987

Leslie K. Pualta

(SEAL)

Notary Public, State of Florida
My Commission Expires Nov. 23, 1990
Bonded Thru Troy Fain - Insurance Inc.

State of Florida
Department of
Environmental Regulation
Notice of Proposed Agency
Action on Permit Application
The Department of Environ-
mental Regulation gives notice
of its intent to issue a per-
mit to Hillsborough County to
increase the allowable
nitrogen oxides, sulfuric acid
mist, and particulate
emissions from their existing
energy recovery (municipal
solid waste incineration) facil-
ity. The facility is located in
Hillsborough County, approxi-
mately two miles east of
Tampa on the County's
Holkensburg Road site. A de-
termination of best available
control technology (BACT)
was required.
This application was re-
viewed under Florida Adminis-
trative Code Rules 17-2.500,
Prevention of Significant
Deterioration. Emissions of
nitrogen oxides, sulfuric acid
mist, and particulates will in-
crease by 739,289, and 7 tons
per year, respectively. The al-
lowable emissions of the other
pollutants are not being in-
creased. The Department has
completed a study of the po-
tential ambient air impact due
to the increase in emissions.
Based on this study, the De-
partment has reasonable as-
surance that the increase in
emissions will not cause or
contribute to an exceedance
of the ambient air quality stan-
dards for these pollutants. No
PSD increment analysis is re-
quired for this modification.
Persons whose substantial
interests are affected by the
department's proposed permit-
ting decision may petition for
an administrative proceeding
(hearing) in accordance with
Section 120.57, Florida Stat-
utes. The petition must con-
form to the requirements of
chapters 17-103 and 28-5, Flori-
da Administrative Code, and
must be filed (received) in the
Office of General Counsel of
the Department at 2600 Blair
Stone Road, Twin Towers Of-
fice Building, Tallahassee, FL
32399-2400, within fourteen
(14) days of publication of this
notice. Failure to file a request
for hearing within this time
period shall constitute a wai-
ver of any right such person
may have to request an ad-
ministrative determination
(hearing) under Section 120.57
Florida Statutes.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate open-
cy action. Accordingly, the
Department's final action may
be different from the position
taken by it in this preliminary
statement. Therefore, persons
who may not object to the pro-
posed agency action may
wish to intervene in the pro-
ceeding. A petition for inter-
vention must be filed pursuant
to Model Rule 28-5.207 at least
five (5) days before the final
hearing and be filed with the
hearing officer if one has been
assigned at the Division of
Administrative Hearings, De-
partment of Administration,
2009 Apalachee Parkway, Tal-
lahassee, Florida 32399-2400. If
no hearing officer has been
assigned, the petition is to be
filed with the Department's
Office of General Counsel,
2600 Blair Stone Road, Tal-
lahassee, Florida 32399-2400.
Failure to petition to intervene
within the allowed time frame
constitutes a waiver of any
right such person has to re-
quest a hearing under Section
120.57, Florida Statutes.
The application 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
Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental
Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
Hillsborough County
Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605
Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as at the Department's Tal-
lahassee address. All comments
mailed within 30 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.
3268 7/19/87

file

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

October 1, 1987

Mr. Miguel Flores
Chief, Permit Review and Technical
Support Branch
National Park Service-Air
Post Office Box 25287
Denver, Colorado 80225

Dear Mr. Flores:

RE: Hillsborough County Resource Recovery Facility
PSD-FL-121

Enclosed is a copy of the Intent to Issue (Public Notice for the above mentioned site which was published in the Tampa Tribune. If you have any questions, please call Barry Andrews or Tom Rogers at (904)488-1344 or write to them at the above address.

Sincerely,

Margaret V. Janes
Planner
Bureau of Air Quality
Management

/mj

enclosure

JL

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

October 1, 1987

Mr. Wayne Aronson
Chief
Program Support Section
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Hillsborough County Resource Recovery Facility
PSD Permit: PSD-FL-121

Enclosed is a copy of the Intent to Issue (Public Notice) for the above mentioned site which appeared in the Tampa Tribune. If you have any comments or questions, please contact Barry Andrews or Tom Rogers at the above address or at (904)488-1344.

Sincerely,

Margaret Jones

Margaret V. Janes
Planner
Bureau of Air Quality
Management

CHF/mj

enclosure

PM
9-23-87
West Caldwell, N.J.

File Copy

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000



AN OGDEN COMPANY

September 23, 1987

HC 0959L
C-1005

Mr. Pradeep Raval
State of Florida
Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

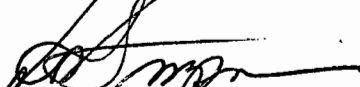
Subject: Hillsborough County Florida
Solid Waste Energy Recovery Project
Public Notice

Dear Mr. Raval:

Enclosed is a copy of the Public Notice published in the Tampa Tribune on July 19, 1987, as well as the notarized proof of publication prepared by the Tampa Tribune.


Please advise us if additional information in this regard will be needed.

Very truly yours,


Roy D. Simpson
Site Supervisor

RDS:hn

copied:

Pradeep Raval
Barry Andriolos
Tom Rogers
CHF/BT
Wayne Aronson, EPA
Miguel Flores, NPS
Victor San Agustin - 10/2/87 

9-28-87 RRM
(verbally told CHF)
not copied yet (✓ PN for correctness)
before sending RRM

DER

SEP 28 1987

BAQM

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller 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 STATE OF FLORIDA DEPARTMENT OF
PROPOSED AGENCY ACTION ON PERMIT
APPLICATION

was published in said newspaper in the issues of

JULY 19, 1987

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 publica-
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paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 19th day
of JULY A.D. 1987

Leslie A. Puatta

(SEAL)

Notary Public, State of Florida
My Commission Expires Nov. 23, 1990

Bonded thru Troy Fair - Insurance Inc.

Notice of Proposed Agency
Action on Permit Application
The Department of Environ-
mental Regulation gives no-
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Tampa on the County's
Adventure Road site. A de-
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control technology (BACT)
was required.
This application was re-
viewed under Florida Adminis-
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Prevention of Significant
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creased. The Department has
completed a study of the po-
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to the increase in emissions.
Based on this study, the De-
partment has reasonable as-
surance that the increase in
emissions will not cause or
contribute to an exceedance
of the ambient air quality stan-
dards for these pollutants. No
PSD increment analysis is re-
quired for this modification.
Persons whose substantial
interests are affected by the
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ting decision may petition for
an administrative proceeding
(hearing) in accordance with
Section 120.57, Florida Stat-
utes. The petition must con-
form to the requirements of
Chapters 17-163 and 28-5, Flori-
da Administrative Code, and
must be filed (received) in the
Office of General Counsel of
the Department at 2600 Blair
Stone Road, Twin Towers Of-
fice Building, Tallahassee, FL
32399-2400, within fourteen
(14) days of publication of this
notice. Failure to file a request
for hearing within this time
period shall constitute a waver
of any right such person
or entity has to request an ad-
ministrative determination
(hearing) under Section 120.57,
Florida Statutes.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agency
action. Accordingly, the
Department's final action may
be different from the position
taken by it in this preliminary
statement. Therefore, persons
who may not object to the pro-
posed agency action may
wish to intervene in the pro-
ceeding. A petition for inter-
vention must be filed pursuant
to Model Rule 28-5.03 (a) (1) (i)
five (5) days before the final
hearing and be filed with the
hearing officer. It has been
signed by the Division of
Administrative Hearings, De-
partment of Administration,
2009 Apalachee Parkway, Tal-
lahassee, Florida 32399-2400. If
no hearing officer has been
assigned, the petition is to be
filed with the Department's
Office of General Counsel,
2600 Blair Stone Road, Tal-
lahassee, Florida 32399-2400.
Failure to petition to intervene
within the allowed time frame
constitutes a waiver of any
right such person has to re-
quest a hearing under Section
120.57, Florida Statutes.
The application 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
Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental
Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
Hillsborough County
Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605
Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as of the Department's Tal-
lahassee address. All comments
mailed within 30 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.
3268
7/19/87



IN REPLY REFER TO:

United States Department of the Interior
FISH AND WILDLIFE SERVICE

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

SEP 22 1987

File Copy
PSD-FL-121
DER
SEP 28 1987
BAQM

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

We appreciate the opportunity to review and comment on the Technical Evaluation and Preliminary Determination for the proposed modification of the Prevention of Significant Deterioration permit for the Hillsborough County Resource Recovery facility. The Hillsborough County facility, located near Tampa, Florida, is approximately 80 km south of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service. Although we do not expect resulting emission increases from the proposed permit modifications to significantly impact the air quality or air quality related values of the refuge, we have several comments regarding the proposed modifications. These comments are discussed in the enclosed technical review document.

If you have any questions regarding our comments please contact Wayne King of our Air Quality staff at 303-969-2806.

Sincerely,


Nelson B. Kverno
Acting Regional Director

Enclosure

copied:

B. Andrews
T. Rogers
P. Raval
F. Campbell, HCEPC
CHF/BT

9-28-87 RBN

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
POST OFFICE BOX 25486
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300



Mr. Bill Thomas
Bureau of Air Quality Mgmt.
Department of Environmental Reg.
Deen Souers Office Building
2600 Blair Stone Road
Tallahassee, FL 32309-2400

PSD-F-121

RR

Carried Friday, Town,
Darryl & CHF/BT. Also,
HCEPC - F. Campbell,

Mr. J. J. J.

9-25-87



POSTAGE AND FEES PAID
U.S. DEPARTMENT OF
THE INTERIOR
INT-423

NO POSTAGE REQUIRED IF MAILED IN THE UNITED STATES

NO POSTAGE REQUIRED IF MAILED IN THE UNITED STATES



Technical Review of the Hillsborough County
Resource Recovery Facility Permit Modifications

The Hillsborough County Resource Recovery Facility (RRF) was originally granted a Prevention of Significant Deterioration (PSD) permit in July 1986 and consists of a mass burn boiler which can burn up to 1200 tons per day (TPD) of solid municipal waste. The Hillsborough County facility is located near Tampa, Florida, approximately 80 km south of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service. The steam from the boiler would be sent to a turbine generator with a capacity of 29 megawatts (gross). Generated electricity would be transmitted to the Tampa Electric Company for distribution. Hillsborough County is now requesting an increase in the permitted nitrogen oxide (NO_x) and sulfuric acid mist (H_2SO_4) emission limitations. The permitted, requested, and resulting emission increases are as follows:

<u>Pollutant</u>	<u>Permitted (TPY)*</u>	<u>Requested (TPY)</u>	<u>Increase (TPY)</u>
NO_x	657	1396	739
H_2SO_4	17	306	289

*Tons Per Year

Based on the proposed emission increases, the requested modification of the Hillsborough County RRF permit constitutes a major modification of an existing major source and is subject to PSD review. Although we do not expect resulting emission increases from the proposed permit modifications to significantly impact the air quality or air quality related values of the refuge, we have several comments regarding the proposed modifications. These comments are discussed below.

The Hillsborough facility was initially issued a PSD permit which limited the emissions of NO_x and H_2SO_4 to 0.16 grains per dry standard cubic foot (gr/dscf) and 0.0040 gr/dscf corrected to 12% CO_2 , respectively. Hillsborough County's request to modify the NO_x and H_2SO_4 emission limitations is based on test data that were unavailable at the time the permit was issued. Based on these data, Hillsborough County claims that they will be unable to meet the permitted NO_x and H_2SO_4 levels. Consequently, Hillsborough County has proposed that the NO_x limitation be increased from 0.16 gr/dscf to 0.34 gr/dscf, and the H_2SO_4 limitation be increased from 0.004 gr/dscf to 0.072 gr/dscf. The State of Florida has agreed to raise the NO_x limitation to 0.34 gr/dscf, or 6.4 lb NO_x /ton of refuse burned, whichever is more restrictive. For H_2SO_4 , the State is deleting the emission limitation altogether based on the recommendation by EPA Region 4 that because no acceptable test method exists for measuring H_2SO_4 emissions from municipal solid waste incinerators, an emission limitation should not be specified in the permit.

Review of the NO_x emission test data provided by Hillsborough County shows that similar resource recovery facilities have NO_x concentrations similar to the preliminary test results at the Hillsborough County facility. For example, the Wurzburg facility tested at 318 ppm and the Stockholm facility tested at 311 ppm, compared to 327 ppm for the Hillsborough County facility. However, as a basis for the revised NO_x limitation, it appears Hillsborough County selected the permitted rate applicable to the Tulsa facility (404 ppm).

In addition, three other proposed mass burn resource recovery facilities, Broward South, Broward North, and Lake County, were recently permitted by the State of Florida at 5.0 lb NO_x/ton refuse burned. The 327 ppm concentration obtained from preliminary test results at the Hillsborough County facility converts to approximately 5.2 lb NO_x/ton of refuse burned, whereas the proposed 404 ppm limitation corresponds to 6.4 lb/ton. The proposed limitation for the Hillsborough County facility appears to be inconsistent with the preliminary test data from the facility and three other recent permitting decisions by the State which limited facilities to 5.0 lb/ton.

In conclusion, based on the information provided in the Technical Evaluation and Preliminary Determination for the modification of the Hillsborough County RRF permit, we recommend that the revised NO_x permit limit be based on (1) the preliminary test results of the Hillsborough facility of 5.2 lbs NO_x/ton refuse burned (327 ppm), or (2) the permitted NO_x emission limits set for the Broward South, Broward North and Lake County facilities (5.0 lbs NO_x/ton refuse burned). Another option available to the State is to leave the permit as it is until actual emission data from the facility are available. Rather than basing the revised NO_x limit on emissions data from other facilities or preliminary test results from the Hillsborough County facility, the State could wait until the Hillsborough facility achieves normal operation and conducts stack testing, and then modify the permit accordingly.

We request that you submit copies of the final determination, which will address our concerns above, and permit when they are issued. If you have any questions, you may contact me or Wayne J. Aronson of my staff at (404) 347-2864.

Sincerely,

Wayne J. Aronson / Acting for

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. Roger P. Stewart, Director
Hillsborough County Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

Mr. William A. Gillen, Jr.
P.O. Box 3324
Tampa, Florida 33601

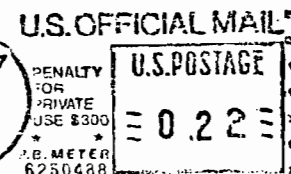
Copies: *Clair Jancy*
Barry Andrews } 9/21/87 *(initials)*
Proctor Paul

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300
AIR-4

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair-Stone Road
Tallahassee, FL 32301-2400



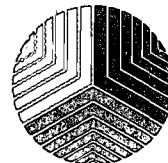
NOV 11 1987



NOV 11 1987
AIR-4
TALLAHASSEE, FL 32301-2400
BUREAU OF AIR QUALITY MANAGEMENT
TWIN TOWERS OFFICE BUILDING
2600 BLAIR-STONE ROAD
TALLAHASSEE, FL 32301-2400
NOV 11 1987
AIR-4
TALLAHASSEE, FL 32301-2400
BUREAU OF AIR QUALITY MANAGEMENT
TWIN TOWERS OFFICE BUILDING
2600 BLAIR-STONE ROAD
TALLAHASSEE, FL 32301-2400

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000



AN OGDEN COMPANY

TELECOPIED & SENT FEDERAL EXPRESS

August 14, 1987

HC-0918L
C-1005

DER

AUG 17 1987

BAQM

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
State of Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Permit No. PSD-FL-121
Expiration Date: March 31, 1988
County: Hillsborough
Project: Hillsborough County Resource
Recovery Facility

Dear Mr. Fancy:

Ogden Martin Systems of Hillsborough, Inc. (OMSH) offers the following comments regarding the technical evaluation and preliminary determination in the draft permit to increase the allowable nitrogen oxides, sulfuric acid mist, and particulate emissions from the Resource Recovery Facility in Hillsborough County, Florida. Under Section I, of the Technical Evaluation and Preliminary Determination titled "Introduction," in paragraph two, OMSH would suggest changing the first sentence to read as follows:

On May 1, 1987, Hillsborough County through Ogden Martin Systems of Hillsborough, Inc., applied to DER to increase the allowable nitrogen oxides (NO_x), and sulfuric acid mist emissions at the Hillsborough County ERF.

OMSH would similarly suggest changing the last sentence on the first page to read:

Subsequently, on June 16, 1987, Hillsborough County through Ogden Martin Systems of Hillsborough, Inc., submitted an application to operate/construct dust suppression equipment that was added to the final design of the ash handling building to ensure that there would be no visible emissions from this plant area.

Mr. C. H. Fancy, P.E.
August 14, 1987
Page Two

On the second page of the Introduction, OMSH would suggest deleting paragraph one in its entirety, since the wording is somewhat misleading. The paragraph refers to "the proposed project" whereas the project has been completed. The existing project consists of three boilers. The fourth boiler may or may not be added in the future; but, in any event, it has nothing to do with the original permit or any modification to date. If the paragraph is not deleted in its entirety, it is suggested that the second sentence of the paragraph be changed to read as follows:

A future plant expansion could increase the total solid waste processing capacity of the plant to 1600 TPD.

Under Section IV, captioned "BACT Determination," OMSH would propose changing the second sentence of the first paragraph to read as follows:

The ERF is designed to burn up to 1200 tons per day (TPD) of refuse at a heating value of 4500 BTU's per pound, which amount will increase or decrease, respectively, based upon lower or higher heating values, in each case, resulting in an electrical generating capacity of 29 megawatts.

The reason for this suggested change is that it more adequately reflects the burning capabilities of the facility, inasmuch as tonnage put through the unit decreases with higher heating value, and increases with lower heating value. The new recommended language more accurately reflects the capacity.

In the second paragraph under part IV, at the top of the page, it is recommended that the word "modified" be inserted in front of PSD.

Under Part V, captioned "Air Quality Analyses" in the subsection captioned "Analysis of Existing Air Quality," there is a major typographical error in the last paragraph in line two. The second sentence of the last paragraph should read"

This value (1 ug/m³)

Our copy has an 11 instead of a 1. The value is correct in Table V-2, but needs to be corrected in the explanatory comments.

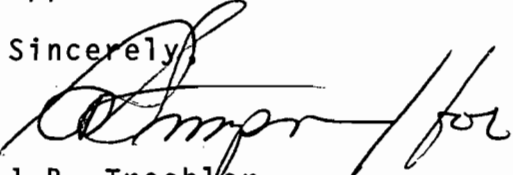
Mr. C. H. Fancy, P.E.
August 14, 1987
Page 3

OMSH recommends that paragraph three of the first page of the permit itself be reworded to segregate particulates from nitrogen oxides and sulfuric acid mist, in order to reflect that these pollutants are emitted from different parts of the plant. It is recommended that the first sentence be reworded to read as follows:

This permit modification pertains to the increases of nitrogen oxides and sulfuric acid mist from the stack and the emission of particulates from the ash residue dust suppression baghouse.

The second sentence of the third paragraph on the first page of the permit needs to be reworded to reflect acceptance of the increased emissions for sulfuric acid mist. As the second sentence presently reads, only specific conditions 1.a.(3), 1.b., and 1.c.(1), are being modified. None of these sections deals with emissions of sulfuric acid mist. Since the third sentence states that all conditions other than the specific conditions addressed in paragraph two remain unchanged, the combination of the second and third sentences does not reflect approval of the increase in sulfuric acid mist.

Sincerely,



J.R. Treshler
Senior Project Manager

JRT:hn

cc: Mr. Bill Thomas

Copied: CHF/B†
Barry Andrews

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL NUMBER

2873586074

DATE

8/14/87

AIRBILL NUMBER

2873586074

From (Your Name)

J. R. TRESHLER

Your Phone Number (Very Important)

() () () () () ()

Company

GREEN PROJECTS INC

Department/Floor No.

Street Address

40 LANE RD

City

FAIRFIELD

State

ZIP Required For Correct Invoicing

07005

To (Recipient's Name)

C. H. FANCY, P.E.

Recipient's Phone Number (Very Important)

() () () () () ()

Company

BUREAU AIR QUALITY MONT

Department/Floor No.

Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result In Extra Charge.)

TWIN TOWERS OFFICE BLDG.**2000 Blair Stone Rd.****Tallahassee, Florida**

ZIP Street Address Zip Required

32399-2400

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)

PAYMENT ☒ Bill Sender ☐ Bill Recipient's FedEx Acct. No. ☐ Bill 3rd Party FedEx Acct. No. ☐ Bill Credit Card☐ Cash

SERVICES CHECK ONLY ONE BOX

1 ☒ **PRIORITY 1 OVERNIGHT LETTER**
Overnight Delivery (Using Your Packaging)
Overnight Delivery (Using Our Packaging)
12" x 15"2 ☐ Courier-Pak Overnight Envelope*
12" x 15"3 ☐ Overnight Box A ☐
12 1/2" x 17 1/2" x 3"4 ☐ Overnight Tube B ☐
38" x 6" x 6"

*Declared Value Limit \$100.

STANDARD AIR

5 ☐ Delivery not later than second business day

SERVICE COMMITMENT

PRIORITY 1 - Delivery is scheduled early next business morning in most locations. It may take two or more business days if the destination is outside our primary service areas.
STANDARD AIR - Delivery is generally next business day or not later than second business day. It may take three or more business days if the destination is outside our primary service areas.

Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.

Release
Signature: **J. R. TRESHLER**

DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED

1 ☐ HOLD FOR PICK-UP (Fill in Section H at right)2 ☐ DELIVER WEEKDAY3 ☐ DELIVER SATURDAY (Extra charge)4 ☐ DANGEROUS GOODS (P-1 and Standard Air Packages only, Extra charge)5 ☐ CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Do Not Complete Section 3)6 ☐ DRY ICE (Extra charge)7 ☐ OTHER SPECIAL SERVICE8 ☐9 ☐ SATURDAY PICK-UP (Extra charge)10 ☐

PACKAGES

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OVER SIZE

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Federal Express Corp./Employee No.

Date/Time For Federal Express Use

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ZIP * Zip Code of Street Address Required

Emp. No. Date

☐ Cash Received☐ Return Shipment☐ Third Party ☐ Chg. To Del. ☐ Chg. To Hold

Street Address

City State Zip

Received By

Date/Time Received FedEx Employee Number

X

Federal Express Use

Base Charges

Declared Value Charge

Origin Agent Charge

Other

Total Charges

PART #106001

FEC-S-751-1000

REVISION DATE

10/88

PRINTED U.S.A. GBFE

RECIPIENT'S COPY



8/12/87
Atlanta, GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

AUG 12 1987

4APT-APB/eaw

DER

AUG 14 1987

BAQM

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

This is to confirm an August 5, 1987, telephone conversation between you and Mr. Wayne J. Aronson of my staff regarding his upcoming inspections of resource recovery facilities in the Tampa and Miami, Florida areas. The following schedule and list of facilities to be visited have been discussed with the appropriate local agency contacts:

August 24, 1987 - Pinellas County Resource Recovery Facility (RRF)
- McKay Bay RRF
- Hillsborough County RRF

August 25, 1987 - City of Lakeland
- Dade County RRF

August 26, 1987 - Palm Beach County RRF

If you have any questions regarding these upcoming inspections, please feel free to contact me or Wayne J. Aronson at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. Iwan Choronenko
Hillsborough County Environmental
Protection Commission

Mr. Patrick Wong
Dade County Environmental
Planning Division

Mr. Peter Hessling
Pinellas County Department of
Environmental Management

Mr. E. J. Sacco
Palm Beach County Health Department

Copied: CHF/BT
Barry Andrews } 8/17/87

PM
8-11-87
Tallahassee, FL

file copy

CARLTON, FIELDS, WARD, EMMANUEL, SMITH, CUTLER & KENT, P. A.

ATTORNEYS AT LAW

ONE HARBOUR PLACE
P. O. BOX 3239
TAMPA, FLORIDA 33601
(813) 223-7000

CNA BUILDING
P. O. BOX 1171
ORLANDO, FLORIDA 32802
(305) 849-0300

200 EAST GOVERNMENT ST.
P. O. BOX 12426
PENSACOLA, FLORIDA 32582
(904) 434-0142

FIRST FLORIDA BANK BUILDING
P. O. DRAWER 190
TALLAHASSEE, FLORIDA 32302
(904) 224-1585

FLORIDA NATIONAL BANK TOWER
P. O. BOX 4700
JACKSONVILLE, FLORIDA 32201
(904) 354-1600

PLEASE REPLY TO:

August 11, 1987

Tallahassee

Hamilton S. Oven
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER

AUG 12 1987

BAQM

Re: Hillsborough County resource recovery facility
PSD-FL-121

Dear Buck:

As you know, the Hillsborough County resource recovery facility was approved pursuant to the Florida Electrical Power Plant Siting Act (Act), Sections 403.501-.519, Florida Statutes. Hillsborough County needs to modify two conditions of the site certification pursuant to Section 403.516(2), Florida Statutes, by entering into a written agreement with the parties to the site certification process.

The specific changes in the conditions of site certification deal with air pollution issues. Those changes already have been tentatively approved by the DER Bureau of Air Quality Management and the U.S. Environmental Protection Agency.

We have prepared a draft Stipulation and Agreement for approval by the Department, Southwest Florida Water Management District, Department of Community Affairs, and Public Service Commission. If the draft agreement is acceptable, I would like the Department's counsel to sign the agreement and then I will circulate it to the other agencies for their signature. When I have received the approval of all of the appropriate agencies, I will bring the agreement back to you for submittal to the Governor and Cabinet, sitting as the Siting Board.

PM
8-10-87
Tallahassee, FL

file copy

CARLTON, FIELDS, WARD, EMMANUEL, SMITH, CUTLER & KENT, P. A.

ATTORNEYS AT LAW

ONE HARBOUR PLACE
P. O. BOX 3239
TAMPA, FLORIDA 33601
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FLORIDA NATIONAL BANK TOWER
P. O. BOX 4700
JACKSONVILLE, FLORIDA 32201
(904) 354-1600

DER

AUG 11 1987

BAQM

PLEASE REPLY TO:

August 10, 1987

Tallahassee

Clair H. Fancy
Deputy Chief
Bureau of Air Quality Management
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Hillsborough County resource recovery facility;
DER File No. PSD-FL-121

Dear Mr. Fancy:

This law firm represents Hillsborough County in the above-referenced case. On behalf of Hillsborough County, we are submitting the following comments concerning the Intent to Issue, Technical Evaluation, Preliminary Determination and draft permit issued by the Department of Environmental Regulation (DER) on July 14, 1987.

For the purposes of this submittal, words which have been underlined should be added to the draft document. Words which have been stricken should be deleted.

Intent to Issue

Page 1, paragraph 2, should state that the County applied for a permit modification for "particulate emissions from the existing refuse to energy facility"

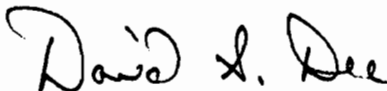
Technical Evaluation and Preliminary Determination

1. Page 1, paragraph 1. Hillsborough County believes that its first PSD permit was properly issued pursuant to the Florida Electrical Power Plant Siting Act. The County does not agree

Hamilton Oven
Page Two
August 11, 1987

Please call me after you have had an opportunity to review this draft stipulation.

Sincerely,



David S. Dee

cc: Dan Thompson
Richard Donelan
Barry Andrews✓
Dan Fernandez (SWFWMD)
Ed Curren (SWFWMD)
Larry Keeseey (DCA)
Mike Twomey (PSC)
Joe Mount
Daryl Smith
Joe Treshler
Bill Gillen

DSD/vc:OVEN

Copied: Barry Andrews
CTP/BT



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

January 19, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County
Post Office Box 1100
Tampa, Florida 33601

Dear Mr. Smith:

Re: Hillsborough County Solid Waste Energy Recovery Facility
Amendment to PSD-FL-121(A)
Site Certification No. 83-19

The Department is in receipt of your letter dated July 8, 1994, requesting an amendment to the facility description (page 1) and Specific Condition No. 3 of the above referenced PSD permit. The Bureau has evaluated your request and approves the following:

Description (page 1) PSD-FL-121(A):

FROM:

For the modification of a 1200 tons per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 Km E and 3092.7 Km N.

TO:

For the modification of the resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 Km E and 3092.7 Km N.

Specific Condition No. 3:

FROM:

The boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.

Mr. Daryl H. Smith
Amendment to PSD-FL-121(A)
January 19, 1995
Page Two

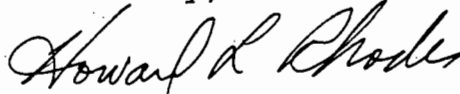
TO:

The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each, equivalent to 1320 tons per day total, but no more than 1200 tons per day on an annual average basis.

Compliance with the 1200 tons per day annual average charging rate shall be determined on a 52-week rolling average based on the weight of solid waste received and processed at the facility. The truck weigh scale records shall be used for this purpose.

A copy of this letter shall be attached to the above mentioned permit and shall become a part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/bjb

Attachment to Be Incorporated:

Mr. Daryl H. Smith's letter of July 8, 1994.

cc: Jewell Harper, EPA
Bill Congdon, OGC
Bill Thomas, SWD
Hamilton Owen, PPS
Jerry Campbell, EPCHC
John Bunyak, NPS

P 872 563 686



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Mr. Daryl H. Smith	
Street and No. P. O. Box 1100	
P.O., State and ZIP Code Tampa, FL 33601	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 1-20-95 Permit: PSD-FL-121(A)	

PS Form 3800, JUNE 1991

<p>SENDER:</p> <ul style="list-style-type: none"> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered. 		<p>I also wish to receive the following services (for an extra fee):</p> <ol style="list-style-type: none"> <input type="checkbox"/> Addressee's Address <input type="checkbox"/> Restricted Delivery <p>Consult postmaster for fee.</p>	
<p>3. Article Addressed to:</p> <p>Mr. Daryl H. Smith, Director Department of Solid Waste Hillsborough County Post Office Box 1100 Tampa, FL 33601</p>		<p>4a. Article Number P 872 563 686</p>	
<p>5. Signature (Addressee)</p>		<p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured</p> <p><input type="checkbox"/> Certified <input type="checkbox"/> COD</p> <p><input checked="" type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p>	
<p>6. Signature (Agent)</p> <p><i>B. Cook</i></p>		<p>7. Date of Delivery JAN 24 1995</p>	
<p>8. Addressee's Address (Only if requested and fee is paid)</p>		<p>Thank you for using Return Receipt Service</p>	
<p>PS Form 3811, December 1991 ★U.S. GPO: 1992-323-402</p>			
<p>DOMESTIC RETURN RECEIPT</p>			

Is your RETURN ADDRESS completed on the reverse side?

Final Determination

Hillsborough County Solid Waste Energy Recovery Facility
Hillsborough County, Florida

File No: PSD-FL-121(A)

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

January 19, 1995

Final Determination

Hillsborough County Solid Waste Energy Recovery Facility
PSD-FL-121(A) and Site Certification No. 83-19

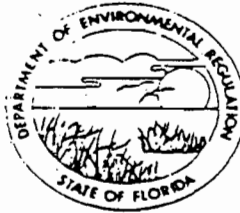
The permit amendment to Hillsborough County Department of Solid Waste Energy Recovery Facility was distributed on October 10, 1994. This facility consists of three incinerator boilers. This permit amendment did not change the intent of the previously issued PSD permit nor did it result in an increase of emissions. The Notice of Intent To Issue was published in The Tampa Tribune on October 20, 1994. Copies of the permit amendment evaluation were available for inspection at the office of the Environmental Protection Commission of Hillsborough County and the Department of Environmental Protection's offices in Tampa and Tallahassee.

No comments were submitted during the public notice period.

The final action of the Department is to issue the permit amendment as noted during the public notice period.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

PERMITTEE:

Hillsborough County
Hillsborough County Courthouse
419 Pierce Street
Tampa, Florida 33602

Permit Number: PSD-FL-121
Expiration Date: March 31, 1988
County: Hillsborough
Latitude/Longitude: 27° 57' 00" N
82° 40' 22" W
Project: Hillsborough County
Resource Recovery Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the modification of a 1,200 ton per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 km E and 3092.7 km N.

This permit solely pertains to the pollutant increases (nitrogen oxides, sulfuric acid mist, and particulates) which result from this modification. Only Specific Condition No. 1 has been modified to reflect the changes requested in this modification. For clarity purposes, the remaining specific conditions which pertain to the pollutants addressed in this modification have been repeated as they appeared in the original PSD permit (PSD-FL-104) and also Specific Condition No. 11 has been added. The other pollutants emitted from this facility are addressed in the original PSD permit. This facility is not subject to any emission limitations or testing requirements for sulfuric acid mist. Except as expressly provided in the Specific Conditions contained herein, all of the other provisions of permit No. PSD-FL-104 remain in effect.

Attachments:

1. May 1, 1987, letter by Richard W. Seelinger.
2. June 8, 1987, letter by Bruce P. Miller, EPA Region IV.
3. June 12, 1987, letter by J. R. Treshler.
4. Letter from David Dee, attorney for Hillsborough County dated August 10, 1987.
5. Letter from Ogden Projects, dated August 14, 1987.

PERMITTEE:
Hillsborough County


Permit Number: PSD-FL-121
Expiration Date: March 31, 1988

SPECIFIC CONDITIONS:

- b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining moisture content when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.
 - e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 7E for concentration of nitrogen oxides.
- (3) The stack tests shall be performed at +10% of the heat input rate of 150 million Btu per hour per boiler; however, compliance with the particulate matter emission limit shall be at design capacity.
- 2. The height of the boiler exhaust stack shall not be less than 220 feet above ground level at the base of the stack.
 - 3. The boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.
 - 4. The boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes
FROM: Clair Fancy 
DATE: January 19, 1995
SUBJECT: Approval of Construction Permit Amendment
Hillsborough Co. Solid Waste Energy Recovery Facility
PSD-FL-121(A), PA 83-19

Attached is a letter prepared by the Bureau of Air Regulation that will amend the PSD permit for the Hillsborough County Solid Waste Energy Recovery Facility. This amendment is recommended for your approval and signature.

CF/pa

Attachment



Department of Environmental Protection

Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

November 14, 1994

Mr. Daryl H. Smith, Director
Department of Solid Waste
Post Office Box 1110
Tampa, Florida 33601

Dear Mr. Smith:

The Department of Environmental Protection has reviewed your request for approval of an ash conditioning system as outlined in your letters dated August 9, 1994, and September 20, 1994. The location of the lime silo and bag filters to control fugitive emissions within the existing building should not significantly increase emission of particulates to the atmosphere. Accordingly, the Department has no objection to the proposed amendment to the plant operating system including the installation of the lime storage tank(s), bag filters, and lime injection piping for the purpose of conditioning the plants ash.

Please provide the this office, the Department's Southwest District Office and the Hillsborough County Environmental Protection Commission with a set of as built plans when the lime storage tank is installed and include a copy of design specifications for the bag filter for the lime storage tank. We would prefer that you use the Department's form entitled Permit to Construct an Air Pollution Source to provide the information.

Sincerely yours,

Hamilton S. Oven

Hamilton S. Oven, P.E.
Administrator, siting
Coordination Office

cc: Clair Fancy, BAR
Bill Thomas, SWD
Ben Kklra, EPC

DEP ROUTING AND TRANSMITTAL SLIP			
TO: (NAME, OFFICE, LOCATION)		3. _____	
1. <u>Clair Fandy BAR</u>	4. <u>Patty</u>	5. <u>FOR FILE</u>	
2. <u>MS 5505</u>	5. _____		
PLEASE PREPARE REPLY FOR: <input type="checkbox"/> SECRETARY'S SIGNATURE <input type="checkbox"/> DIV/DIST DIR SIGNATURE <input type="checkbox"/> MY SIGNATURE <input type="checkbox"/> YOUR SIGNATURE <input type="checkbox"/> DUE DATE _____ ACTION/DISPOSITION <input type="checkbox"/> DISCUSS WITH ME <input type="checkbox"/> COMMENTS/ADVISE <input type="checkbox"/> REVIEW AND RETURN <input type="checkbox"/> SET UP MEETING <input type="checkbox"/> FOR YOUR INFORMATION <input type="checkbox"/> HANDLE APPROPRIATELY <input type="checkbox"/> INITIAL AND FORWARD <input type="checkbox"/> SHARE WITH STAFF <input checked="" type="checkbox"/> FOR YOUR FILES		COMMENTS: <div style="text-align: center; font-size: 1.5em; font-weight: bold; margin: 20px 0;">RECEIVED</div> <div style="text-align: center; font-weight: bold; margin: 10px 0;">NOV 15 1994</div> <div style="text-align: center; margin: 10px 0;">Bureau of Air Regulation</div>	
FROM: <u></u>		DATE: <u>11-14-94</u> PHONE: <u>7-0472</u>	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 11 1987

4APT/APB-aes

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-2400

Re: Hillsborough County PSD-FL-¹²¹~~104~~

Dear Mr. Fancy:

This is to acknowledge receipt of your July 14, 1987, PSD preliminary determination modifying emissions limits for sulfuric acid mist and nitrogen oxides, and the addition of particulate emission limits for the newly proposed ash handling emission control equipment.

We concur with your determination and permit conditions as indicated. However, the determination should make clear that the significant net emissions increase in nitrogen oxides and sulfuric acid mist for which this source is undergoing PSD review are not the result of a physical change or change in operation at the facility. The "Rule Applicability" section of the determination should provide explanation that the increases are requested permit modifications due to an error in estimating emissions in the construction permit application and that permit modifications resulting in significant net emissions increases require the issuance of a PSD permit. Although this modification requires that a BACT determination be performed for nitrogen oxides and sulfuric acid mist, the determination may consist of the previous BACT determination contained in the original EPA issued PSD permit without further evaluation of present BACT determinations (e.g. acid gas controls). This allowance is made due to the fact that emissions increases are not a result of a physical change in the plant or its operation, and are not due to the failure of prescribed pollution control equipment required in the EPA issued PSD permit.

Please note that the FDER issued PSD permit (PSD-FL-120) will supersede the emission limits for nitrogen oxides and sulfuric acid mist, as contained in the original EPA issued PSD permit (PSD-FL-104). Once the FDER PSD permit is issued, the facility will no longer be required to meet the nitrogen oxides, and sulfuric acid emissions limits contained in the EPA PSD permit PSD-FL-104 for reasons cited in your final determination.

PM
14 Sept. 87
Atlanta, GA

File copy

DER
SEP 18 1987
BAQM

November 9, 1994

Mr. Clair Fancy, Bureau Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subj: ~~Lake County Resource Recovery Facility Permit No. PSD-FL-~~

Dear Mr. Fancy:

On October 10, 1994, the Department issued an Intent to Issue Permit Amendment to the Hillsborough County Department of Solid Waste for the Hillsborough County Resource Recovery Facility (PSD-FL-121(A)). The referenced amendment addressed, among other things, the way in which facility throughput was to be calculated for demonstrating compliance with permit conditions.

Ogden Martin Systems of Lake (a.k.a. NRG Recovery Group) is requesting a similar amendment, in order to eliminate confusion that has developed with the Central District compliance staff. Presented below is the proposed language for the requested amendment:

Specific Condition No. 1.b. currently reads:

"The maximum individual MWC throughput shall not exceed 288 tons per day, 120 million Btu per hour and 69,000 pounds steam per hour, (3-hour average)."

Proposed change to Specific Condition No. 1.b.:

"The maximum individual MWC throughput shall not exceed 288 tons per day, 120 million Btu per hour and 69,000 pounds steam per hour, (3-hour average). Steam flow shall be used as the surrogate parameter for demonstrating compliance with such hourly and daily charging limitations."

Using steam flow as a surrogate measure is consistent with 40 CFR 60.58a subparagraph (h)(6)(i) and subparagraph (j)(1), the New Source Performance Standards pertaining to compliance and performance testing of Municipal Waste Combustors.

Your prompt attention to this matter is greatly appreciated.

cc Ogden Martin AC 35-115379, PSD FL-113 7/4/95

AN OGDEN PROJECTS
COMPANY

OGDEN MARTIN SYSTEMS OF HUNTSVILLE, INC.

5251 Triana Blvd.

Huntsville, AL 35805

(205) 882-1019 - Phone

(205) 880-0348 - FAX

FAX TRANSMISSION COVER SHEET

DATE: 11/12/94
TO: D. Lehman
FAX #: _____
(ATTENTION)
FROM: J. Gerrie
(NAME)

NUMBER OF PAGES (Includes Cover Sheet): 2PLEASE CALL IMMEDIATELY IF THIS TRANSMISSION IS NOT RECEIVED OR
ANYTHING IS NOT CLEARLY LEGIBLE.

(PHONE NO.)

(PERSON TO CONTACT)

MESSAGE:

First draft of amendment request. I will
call Monday after the meeting.

JASON

(SIGNATURE)

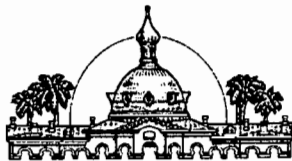
HILLSBOROUGH COUNTY

Florida

Office of the County Administrator
Frederick B. Karl

BOARD OF COUNTY COMMISSIONERS

Phyllis Busansky
Joe Chillura
Lydia Miller
Jim Norman
Jan Platt
Ed Turanchik
Sandra Wilson



Senior Assistant County Administrator
Patricia Bean

Assistant County Administrators
Edwin Hunzeker
Cretta Johnson
Jimmie Keel
Robert Taylor

November 4, 1994

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399

RECEIVED

NOV 10 1994

RE: DEP File No. PSD-FL-121 (A)
Hillsborough County, Florida

Bureau of
Air Regulation

Dear Mr. Fancy:

On October 20, 1994, the Hillsborough County Department of Solid Waste (DSW) published the Notice of Intent to Issue Permit Amendment PSD-FL-121(A). The DSW did not receive any copies of petitions for an administrative proceeding (hearing) during the fourteen (14) day period following the publication of the public notice as was required by any potential petitioners.

The DSW is, therefore, proceeding with the implementation of the conditions of the permit amendment, PSD-FL-121(A), effective November 4, 1994 pursuant to the "Intent to Issue Permit Amendment".

Sincerely

Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County, FL

DHS/tgs

xc: Susan Allan, County Attorney's Office
Thomas Smith, DSW
Bill Thomas, FDEP
Jerry Campbell, HCEPC
John Burbridge, OMSH
Fancy.PSD

BOARD OF COUNTY COMMISSIONERS
HILLSBOROUGH COUNTY, FLORIDA

AIR RES
CLAIR

Office of the County Attorney

Emeline C. Acton, County Attorney
Ronald G. McCord, Chief Assistant
Donald R. Odum, Chief Assistant
Jennie Granahan Tarr, Chief Assistant
Guilene F. Theodore, Chief Assistant
John Dixon Wall, Chief Assistant
Joseph Egozcue, Administrator



October 25, 1994

County Center
601 E. Kennedy Blvd. -- 27th Floor

P.O. Box 1110
Tampa, Florida 33601
(813) 272-5670
Fax (813) 272-5231

RECEIVED

NOV 2 1994

Bureau of
Air Regulation

Department Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Proof of Publication on Permit Amendment PSD-FL-121(A);
Hillsborough County Department of Solid Waste/Daryl Smith

To Whom it May Concern :

Enclosed is an affidavit of the legal ad placed in the Tampa Tribune referencing the Notice of Intent to issue permit amendment PSD-FL-121(A) .

If you have any further questions please do not hesitate to contact me at 272-5670. Thank You.

RECEIVED

NOV 2 1994

Division of Air
Resources Management

Sincerely,

Dorangela Mazzone
Dorangela Mazzone
Paralegal, Municipal Services

CC: Susan Allan, Assistant County Attorney
Daryl Smith, Director Dept. of Solid Waste

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Enclosures

OCT 28 1994

OFFICE OF THE SECRETARY

CAO# 93-757

cc: J. Campbell, EPC HC
J. Temple, EPA
C. Denny, NPS
B. Allen, PPS
B. Condon, DEP
B. Thomas, SW Dist

An Affirmative Action/Equal Opportunity Employer

THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

State of Florida

County of Hillsborough } ss.

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting 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

STATE OF FLORIDA

was published in said newspaper in the issues of

OCTOBER 20, 1994

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 he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me, this
OCTOBER 20, A.D. 19

Personally Known _____ or Produced Identification _____
Type of Identification Produced _____

(SEAL)

Imas Kennedy

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request 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:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Environmental Protection Commission of Hillsborough County
1410 N. 21st Street
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. John Brown at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.
4851 10/20/94

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT
PSD-FL-1214A
The Department of Environmental Protection gives notice of its intent to issue a permit amendment to Hillsborough County Department of Solid Waste Energy Recovery Facility, P.O. Box 1110, Tampa, Florida 33601. This facility consists of three incinerator boilers. This facility is located 0.6 miles north of State Route 60 between Faulkenburg Road and the TECO transmission line corridor in Tampa, Hillsborough County, Florida. This permit amendment will not change the intent of the previously issued PSD permits nor will it result in an increase of emissions.
A person whose substantial

interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner; the applicant's name and address; the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

BOARD OF COUNTY COMMISSIONERS
HILLSBOROUGH COUNTY, FLORIDA

RECEIVED
OCT 19 1994

Office of the County Attorney



Emeline C. Acton, County Attorney
Ronald G. McCord, Chief Assistant
Donald R. Odum, Chief Assistant
Jennie Granahan Tart, Chief Assistant
Guilene F. Theodore, Chief Assistant
John Dixon Wall, Chief Assistant
Joseph Egozue, Administrator

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

October 14, 1994

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399

Re: Intent to Issue Permit Amendment
DEP File No. PSD-FL-121 (A)
Hillsborough County Resource Recovery Facility

Dear Mr. Fancy:

Hillsborough County is in receipt of the Department of Environmental Protection's Intent to Issue Permit Amendment in regard to the County's Resource Recovery Facility. It is the County's intent to publish the Notice of Intent as soon as possible.

There is one point which I would like to clarify. The Intent to Issue Permit Amendment refers to the application of Hillsborough County as being applied for "on July 13, 1994." However, the actual letter requesting the permit amendment from Hillsborough County is dated July 8, 1994, and is attached and referenced as the County's Application. The County will be proceeding on the basis that the County's letter requesting an amendment of July 8, 1994 is the letter being referenced in the Intent to issue Permit Amendment. It is possible that the July 13th date referred to is the date the County's July 8th letter was received by the Department of Environmental Protection.

If I am incorrect in this assumption, please let me know immediately, since the County will be publishing the Notice of Intent shortly and is proceeding on this understanding. Thank you for your cooperation.

Sincerely,

Susan M. Allan
Assistant County Attorney

SMA/ch

cc: Daryl Smith, Director, Department of Solid Waste

An Affirmative Action/Equal Opportunity Employer

10-26-94 2:45 pm

Spoke w Susan Allan at told her that the date stated in the Intent package was the date that the Department received the application/request. She said that a letter response was not necessary.

RTJ640WIT:ch
CAO #93-757-1

R. Bruce Mitchell

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit Amendment
by:

DEP File No. PSD-FL-121(A)
Hillsborough County

Mr. Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County
Post Office Box 1100
Tampa, Florida 33601

INTENT TO ISSUE PERMIT AMENDMENT

The Department of Environmental Protection gives notice of its intent to issue a permit amendment (copy attached) for the proposed project as detailed in the letter specified above, for the reasons stated in the letter.

The applicant, Hillsborough County Department of Solid Waste, applied on July 13, 1994, to the Department of Environmental Protection for an amendment to their Solid Waste Energy Recovery Facility's permit located at Faulkenberg Road in Tampa, Hillsborough County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven 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 amendment.

The Department will issue this permit amendment with the attached conditions unless a petition for an administrative

proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

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

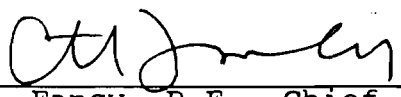
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only

be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

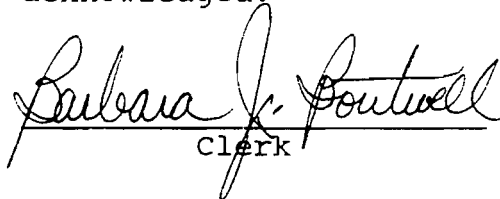

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on 10/10/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk
10/10/94
Date

Copies furnished to:

Jerry Campbell, EPCHC
Jewell Harper, EPA
John Bunyak, NPS
Hamilton Oven, PPS
Bill Congdon, Esq., DEP
Bill Thomas, SWD

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

PSD-FL-121(A)

The Department of Environmental Protection gives notice of its intent to issue a permit amendment to Hillsborough County Department of Solid Waste Energy Recovery Facility, P. O. Box 1110, Tampa, Florida 33601. This facility consists of three incinerator boilers. This facility is located 0.6 miles north of State Route 60 between Faulkenburg Road, and the TECO transmission line corridor in Tampa, Hillsborough County, Florida. This permit amendment will not change the intent of the previously issued PSD permits nor will it result in an increase of emissions.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request 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:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Environmental Protection Commission of
Hillsborough County
1410 N. 21st Street
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. John Brown at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Z 751 859 987



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to Mr. Daryl H. Smith	
Street and No. Post Office Box 1100	
P.O., State and ZIP Code Tampa, Florida 33601	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 10/10/94 PSD-FL-121(A)	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. ☐ Addressee's Address
- 2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County
Post Office Box 1100
Tampa, Florida 33601

4a. Article Number
Z 751 859 987

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
OCT 12 1994

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

B. Cook

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 7, 1994

DRAFT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County
Post Office Box 1100
Tampa, Florida 33601

Dear Mr. Smith:

Re: Hillsborough County Solid Waste Energy Recovery Facility
Amendment to PSD-FL-121(A)
Site Certification No. 83-19

The Department is in receipt of your letter dated July 8, 1994, requesting an amendment to the facility description (page 1) and Specific Condition No. 3 of the above referenced PSD permit. The Bureau has evaluated your request and approves the following:

Description (page 1) PSD-FL-121(A):

FROM:

For the modification of a 1200 tons per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 KM E and 3092.7 Km N.

TO:

For the modification of the resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 KM E and 3092.7 Km N.

Specific Condition No. 3:

FROM:

The boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.

DRAFT

Mr. Daryl H. Smith
Amendment to PSD-FL-121(A)
October 7, 1994
Page Two

TO:

The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each, equivalent to 1320 tons per day total, but no more than 1200 tons per day on an annual average basis.

Compliance with the 1200 tons per day annual average charging rate shall be determined on a 52-week rolling average based on the weight of solid waste received and processed at the facility. The truck weigh scale records shall be used for this purpose.

A copy of this letter shall be attached to the above mentioned permit and shall become a part of the permit.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/bjb

Attachment to Be Incorporated:

Mr. Daryl H. Smith's letter of July 8, 1994.

cc: Jewell Harper, EPA Hamilton Owen, PPS
Bill Congdon, OGC Jerry Campbell, EPCHC
Bill Thomas, SWD John Bunyak, NPS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

SEP 22 1994

RECEIVED

SEP 30 1994

4APT-AEB

Bureau of
Air Regulation

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Hillsborough County Solid Waste Energy Recovery
Facility (HCSWERF), PSD-FL-104 and PSD-FL-121

Dear Mr. Fancy:

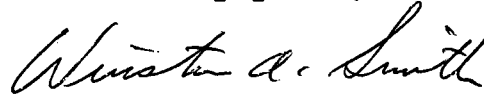
As requested in your letter dated August 8, 1994, we have reviewed the Prevention of Significant Deterioration (PSD) permits and associated material for the above referenced facility. The original site certification application proposed the installation of four boilers, each with a nameplate charging capacity of 400 TPD of municipal solid waste (MSW). The capacity was based on an average BTU value of the waste. When the BTU value was lower than the average number, each boiler was capable of handling up to 440 TPD MSW (110% of nameplate). The application indicated that while short term operation may have a maximum charging rate of 440 TPD per boiler, the long term operation would correspond to an average of 400 TPD per boiler. Thus, we concur that your proposed permit amendments do not change the intent of the previously issued PSD permits, nor will they result in any additional emissions.

In response to your question as to whether the Florida Department of Environmental Protection (FDEP) or the Environmental Protection Agency (EPA) should issue the revised permit, the authority to take final action under the PSD regulations has been delegated to the State of Florida for sources subject to both the federal PSD regulations and the State's Power Plant Siting Act. Such authority includes revising previously issued PSD permits. The delegation of authority for full implementation of the federal PSD regulations was issued to the State of Florida on October 26, 1993.

Finally, in response to your question as to whether the permit revision should be public noticed, it is EPA's opinion that the permit revision should go through public notice procedures.

If you have any questions or need clarification on any of these comments, please contact Mr. Gregg Worley of my staff at (404) 347-2904.

Sincerely yours,

A handwritten signature in cursive script that reads "Winston A. Smith".

Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: Ferry Campbell

DATE: 8-9-94 PHONE: _____

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 6

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: Please call me to confirm that you received
readable copies. Also, Clair said that he will
call you after his staff meeting this a.m.

Bruce

sc/225-1344

PHONE: 904-921-9506 direct

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call
the above phone number.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

MESSAGE CONFIRMATION

AUG-09-'94 TUE 10:19

TERM ID:

P-9999

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
173	08-09	10:15	00:03:03	HILL'S CO EPC		06	00



Department of Environmental Protection

File
Copy

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

"Sent Certified"

August 8, 1994

Ms. Jewell Harper
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Ms. Harper:

RE: HILLSBOROUGH COUNTY SOLID WASTE ENERGY RECOVERY FACILITY
(HCSWERF)
PSD-FL-104 & PSD-FL-121 - Site Certification No. 83-19

Attached please find a July 8, 1994, letter from HCSWERF requesting a revision of the PSD-FL-121 permit. In addition, we are also including a copy of the permit, issued by the Department on October 14, 1987.

All of the above permits have a specific condition that limit the hourly municipal solid waste (MSW) rate of each boiler incinerator to 36,666 pounds per hour. This hourly rate is equivalent to 1320 ton/day MSW feed rate. However, the PSD-FL-121 permit has a description (page 1) which states that the MSW feed rate of the facility is 1200 ton/day. That description seems to have originated with the Federal Register notice, enclosed, which was published when the region issued permit number PSD-FL-104.

This statement (1200 ton/day MSW rate limitation) has generated confusion between the regulated source and the Agency. We believe that the corrections drafted in the Department's response letter to HCSWERF will clarify the language of PSD-FL-121 permit without changing its intent.

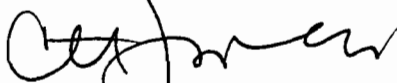
Please advise by September 5, 1994 as follows:

1. Do you concur?
2. Should the Region IV or the Department issue the revision?
3. Should the revision be public noticed?

Ms. Jewell Harper
August 8, 1994
Page Two

If you have any questions, please feel free to call me at (904)
488-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/TH/bjb

Attachment

cc: B. Thomas, SWD
J. Campbell, EPCHC
H. Oven, DEP
B. Congdon, Esq., DEP
J. Bunyak, NPS

P 872 562 528



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Jewell Harper	
Street and No.	
345 Courtland St., NE	
P.O., State and ZIP Code	
Atlanta, GA 30308	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, JUNE 1991



Department of Environmental Protection

DRAFT

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August XX, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County
Post Office Box 1100
Tampa, Florida 33601

Dear Mr. Smith:

RE: Hillsborough County Solid Waste Energy Recovery Facility
(HCSWERF)
PSD-FL-121A - Site Certification No. 83-19

The Department is in receipt of your letter dated July 8, 1994, requesting an amendment to the facility description (page 1) and specific condition No. 3 of the above referenced PSD permit. The Bureau has evaluated your request and approves the following:

Description (page 1) PSD-FL-121:

FROM:

For the modification of a 1200 tons per day resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 KM E and 3092.7 Km N.

TC:

For the modification of the resource recovery facility located at the permitted existing municipal solid waste resource recovery facility in Hillsborough County approximately two miles east of Tampa on the county's Faulkenburg Road site. The UTM coordinates of the plant are 368.2 KM E and 3092.7 Km N.

DRAFT

Mr. Daryl H. Smith
Letter Amendment to HCSWERF: PSD-FL-121A
August XX, 1994
Page Two

Specific Condition No. 3:

FROM:

The boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each.

TO:

The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each, equivalent to 1320 tons per day total, but no more than 1200 tons per day on an annual average basis.

Steam flow shall be used as a surrogate for hourly and daily charging rate limitations. The steam flow shall not exceed 98,388 pounds per hour per boiler based on a maximum heating value of 4,500 BTU/lb.

Compliance with the 1200 tons per day annual average charging rate shall be determined on a 52-week rolling average based on the weight of solid waste received and processed at the facility. The truck weigh scale records shall be used for this purpose.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

DRAFT

Mr. Daryl H. Smith
Letter Amendment to HCSWERF: PSD-FL-121A
August XX, 1994
Page Three

- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

A copy of this letter shall be attached to the above mentioned permit and shall become a part of the permit.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/bjb

Attachment to Be Incorporated:

Mr. Daryl H. Smith's letter of July 8, 1994

cc: Jewell Harper, EPA	Hamilton Oven, PPS
Bill Congdon, OGC	Jerry Campbell, HCEPC
Bill Thomas, SWD	John Bunyak, NPS

RECEIVED

AUG 1 1994

7-29-94

Teresa,

Bureau of
Air Regulation

Here is a copy of the PSD permit for
Hillsborough RRF (PSD-FI-104). We do not
have the actual signed cover page. I also
sent a copy of the signed Federal Register notice.

Scott Davis

PSD-FI-104

issued July 1986

July 1994 Correspondence

HILLSBOROUGH COUNTY RECEIVED

Florida

Office of the County Administrator
Frederick B. Karl

JUL 12 1994

BOARD OF COUNTY COMMISSIONERS

Phyllis Busansky
Joe Chillura
Sylvia Kimbell
Lydia Miller
Jim Norman
Jan Platt
Ed Turanchik



Bureau of
Air Regulation
Senior Assistant County Administrator
Patricia Bean

Assistant County Administrators
Edwin Hunzeker
Cretta Johnson (Interim Appointment)
Jimmie Keel
Robert Taylor (Interim Appointment)

July 8, 1994

Mr. Clair Fancy, Bureau Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Hillsborough County Solid Waste Energy Recovery Facility Permit No. **PSD-FL-121**
and Site Certification No. 83-19 - Permitted Capacity Issue

Dear Mr. Fancy:

On July 29, 1993, a representative from the Hillsborough County Environmental Protection Commission (EPC) visited the Hillsborough County Solid Waste Energy Recovery Facility (Facility) to conduct a regulatory inspection. As a result of the inspection, the EPC, on August 12, 1993, issued a warning notice to the Hillsborough County Department of Solid Waste (DSW) which alleged that the Facility was operating in a manner inconsistent with the terms of its PSD permit. Specifically, the warning notice alleged the Facility's failure to demonstrate compliance with the processing rate and the exceedance of a processing rate of 1,200 tons per day (TPD).

Following the issuance of the warning notice, several meetings were held with the EPC and the Florida Department of Environmental Protection (DEP) to discuss the warning notice. The DSW and its Facility operator, Ogden Martin Systems of Hillsborough, Inc. (OMSH), contend, with the support of legal counsel, that the Site Certification and the PSD permit allow the Facility to operate at a maximum daily throughput of 1,320 tons with an annual average capacity limitation of 1,200 TPD. This interpretation is consistent with the Site Certification and does not result in any increase in emissions.

However, in order to eliminate any similar confusion in the future, the DSW requests an amendment to PSD-FL-121 to clarify this interpretation so that it coincides with Site Certification No. 83-19. Presented below is the proposed language for the amendment to PSD-FL-121. The revised language is shown in bold.

Clair Fancy
July 8, 1994
Page Two

1) Page 1 currently reads:

"For the modification of a 1,200 ton per day resource recovery facility..."

Amend to read:

"For the modification of **the** resource recovery facility..."

2) Page 8, Specific Condition No. 3 currently reads:

"The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each."

Amend to read:

"The incinerator boilers shall not be loaded in excess of their rated capacity of 36,666 pounds per hour each, **equivalent to 1,320 tons per day total, but no more than 1,200 tons per day on an annual average basis.**

Steam flow shall be used as a surrogate for hourly and daily charging rate limitations. The steam flow shall not exceed 98,388 pounds per hour per boiler based upon the following:

$$\frac{4,500 \text{ Btu/lb waste} \times 36,666 \text{ lb waste/hr}}{1,677 \text{ Btu/lb Steam}} = 98,388 \text{ lb/hr Steam}$$

Compliance with the 1,200 tpd annual average charging rate shall be determined on the basis of the 52-week rolling average weight of solid waste received and processed at the Facility. The truck weigh scale records shall be used for this purpose."

Using steam flow as a surrogate measure is consistent with 40 CFR Part 60.58a subparagraph (h)(6)(i) and subparagraph (j)(1), the New Source Performance Standards pertaining to compliance and performance testing of Municipal Waste Combusters.

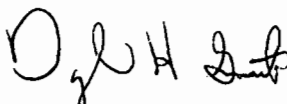
Clair Fancy
July 8, 1994
Page Three

Your prompt attention to this matter will be greatly appreciated as Hillsborough County has incurred substantial costs in operating the Facility in a manner consistent with EPC's interpretation of the processing rate. Since receiving the warning notice from the EPC, the County has diverted more than 16,000 tons of solid waste, with a corresponding loss in minimum gross electrical revenues of \$118,080. These figures represent losses necessitated by operating the Facility at the capacity limitation as interpreted by the EPC and do not include additional costs for disposal at the City of Tampa or Pasco County waste-to-energy facilities because of the diversions.

In spite of this economic burden, the County will continue to operate the Facility in a manner consistent with the EPC's interpretation until this matter is clarified.

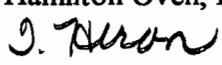
Please advise should you have any questions concerning the requested amendment. You may contact either Thomas Smith at (813)276-2909 or myself at (813)276-2900 should you desire to discuss the matter further.

Sincerely,



Daryl H. Smith, Director
Department of Solid Waste

DHS/tgs

xc: Thomas Smith, DSW
Susan Allan, County Attorney's Office
Dan Strobbridge, CDM
Joseph Treshler, OMSH
Jerry Campbell, EPC
Sara Fotopulos, EPC
John Brown, DEP
Hamilton Owen, DEP




Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
Tel: 813 281-2900 Fax: 813 288-8787



October 16, 1997

RECEIVED
OCT 20 1997
BUREAU OF
AIR REGULATION

Ms. Teresa Heron, P.E.
Engineer, New Source Review Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Hillsborough County Retrofit Draft Permit Conditions

Dear Ms. Heron:

Enclosed is a disk containing the proposed permit conditions contained in Hillsborough County's application for a modification to its Power Plant Site Certification which will allow the construction of the air pollution control retrofit. The permit is a WordPerfect 6.0 file.

If you have any questions or comments, please do not hesitate to call me.

Sincerely,

CAMP DRESSER & McKEE INC.

Daniel E. Strobridge
Associate

cc: Thomas Smith, Hillsborough County
Martha Chumbler, Carlton Fields
Don Elias, RTP

P 872 563 686



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Mr. Daryl H. Smith	
Street and No. P. O. Box 1100	
P.O., State and ZIP Code Tampa, FL 33601	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 1-20-95 Permit: PSD-FL-121(A)	

PS Form 3800, JUNE 1991

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

**Mr. Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County
Post Office Box 1100
Tampa, FL 33601**

4a. Article Number

P 872 563 686

4b. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input checked="" type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

JAN 24 1995

5. Signature (Addressee)

6. Signature (Agent)

B. Cook

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991

☆U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT



Department of Environmental Protection

Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

November 14, 1994

Mr. Daryl H. Smith, Director
Department of Solid Waste
Post Office Box 1110
Tampa, Florida 33601

Dear Mr. Smith:

The Department of Environmental Protection has reviewed your request for approval of an ash conditioning system as outlined in your letters dated August 9, 1994, and September 20, 1994. The location of the lime silo and bag filters to control fugitive emissions within the existing building should not significantly increase emission of particulates to the atmosphere. Accordingly, the Department has no objection to the proposed amendment to the plant operating system including the installation of the lime storage tank(s), bag filters, and lime injection piping for the purpose of conditioning the plants ash.

Please provide the this office, the Department's Southwest District Office and the Hillsborough County Environmental Protection Commission with a set of as built plans when the lime storage tank is installed and include a copy of design specifications for the bag filter for the lime storage tank. We would prefer that you use the Department's form entitled Permit to Construct an Air Pollution Source to provide the information.

Sincerely yours,

Hamilton S. Oven

Hamilton S. Oven, P.E.
Administrator, siting
Coordination Office

cc: Clair Fancy, BAR
Bill Thomas, SWD
Ben Kklra, EPC

DEP ROUTING AND TRANSMITTAL SLIP				
TO: (NAME, OFFICE, LOCATION)		3. _____		
1. <u>Clair Fancy BAR</u>	4. <u>Patly</u>		FOR FILE	
2. <u>MS SSOS</u>	5. _____			
PLEASE PREPARE REPLY FOR: <input type="checkbox"/> SECRETARY'S SIGNATURE <input type="checkbox"/> DIV/DIST DIR SIGNATURE <input type="checkbox"/> MY SIGNATURE <input type="checkbox"/> YOUR SIGNATURE <input type="checkbox"/> DUE DATE _____ ACTION/DISPOSITION <input type="checkbox"/> DISCUSS WITH ME <input type="checkbox"/> COMMENTS/ADVISE <input type="checkbox"/> REVIEW AND RETURN <input type="checkbox"/> SET UP MEETING <input type="checkbox"/> FOR YOUR INFORMATION <input type="checkbox"/> HANDLE APPROPRIATELY <input type="checkbox"/> INITIAL AND FORWARD <input type="checkbox"/> SHARE WITH STAFF <input checked="" type="checkbox"/> FOR YOUR FILES		COMMENTS: <div style="text-align: center; font-size: 1.5em; font-weight: bold; margin: 20px 0;">RECEIVED</div> <div style="text-align: center; font-weight: bold; margin: 10px 0;">NOV 15 1994</div> <div style="text-align: center; margin: 10px 0;">Bureau of Air Regulation</div>		
FROM: <u></u> <u></u> DATE: <u>11-14-94</u> PHONE: <u>2-0472</u>				

THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

State of Florida

County of Hillsborough } ss.

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting 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

STATE OF FLORIDA

was published in said newspaper in the issues of

OCTOBER 20, 1994

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 he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me, this
OCTOBER 20, A.D. 1994

Personally Known _____ or Produced Identification _____

Type of Identification Produced _____

(SEAL)

Ima S Kennedy

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application/request have the right to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request 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:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Environmental Protection Commission of
Hillsborough County
1410 N. 21st Street
Tampa, Florida 33605
Any person may send written comments on the proposed action to Mr. John Brown at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.
4851 10/20/94

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
NOTICE OF INTENT
TO ISSUE PERMIT
AMENDMENT
PSD-FL-121(A)

The Department of Environmental Protection gives notice of its intent to issue a permit amendment to Hillsborough County Department of Solid Waste Energy Recovery Facility, P.O. Box 1110, Tampa, Florida 33601. This facility consists of three incinerator boilers. This facility is located 0.6 miles north of State Route 60 between Faulkenburg Road and the TECO transmission line corridor in Tampa, Hillsborough County, Florida. This permit amendment will not change the intent of the previously issued PSD permits nor will it result in an increase of emissions.

A person whose substantial

Interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

Z 751 859 987



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to Mr. Daryl H. Smith	
Street and No. Post Office Box 1100	
P.O., State and ZIP Code Tampa, Florida 33601	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 10/10/94 PSD-FL-121(A)	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Daryl H. Smith, Director
Department of Solid Waste
Hillsborough County
Post Office Box 1100
Tampa, Florida 33601

4a. Article Number

Z 751 859 987

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

OCT 12 1994

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

B. Cook / B. Cook

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE

Official Business



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



RECEIVED
OCT 17 1994

Print your name, address and ZIP Code here
Patty Adams
Department of Environmental Protection
Bureau of Air Regulation - MS 5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



P 872 562 528



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Jewell Harper	
Street and No.	
345 Courtland St., NE	
P.O., State and ZIP Code	
Atlanta, GA 30308	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, JUNE 1991

Teresa Heron
July 25, 1994
Memorandum
Page 3

Permit Limitation After Modification: 1320 TPD
Compliance Monitoring: 98,388 pounds of steam per hour per boiler
using 4500 BTU per pound of waste

Steam Required

$$3 \text{ units} \times 98,388 \frac{\# \text{ steam}}{\text{unit-hr}} \times 24 \frac{\text{hr}}{\text{day}} = 7,083,936 \frac{\# \text{ steam}}{\text{day}}$$

Scenario #1 - Actual Heat Content of Waste Burned is 4500 BTU per Pound

$$7,083,936 \frac{\# \text{ steam}}{\text{day}} \times \frac{1677 \text{ BTU}}{\# \text{ steam}} \times \frac{\text{Ton Waste}}{2000 \# \text{ Waste}} = 1320 \frac{\text{Tons Waste}}{\text{day}}$$

Scenario #2 - Actual Heat Content of Waste Burned is 4000 BTU per Pound

$$7,083,936 \frac{\# \text{ steam}}{\text{day}} \times \frac{1677 \text{ BTU}}{\# \text{ steam}} \times \frac{\text{Ton Waste}}{2000 \# \text{ Waste}} = 1485 \frac{\text{Tons Waste}}{\text{day}}$$

$\frac{4000 \text{ BTU}}{\# \text{ Waste}}$

Under Scenario #2, the proposed compliance methodology fails to accurately quantify the amount of waste burned. While they would report they complied with a 1320 ton limitation, they would have exceeded this by 165 tons. In fact, they will exceed their limitation on a regular basis during the summer season when the heat content is lower.

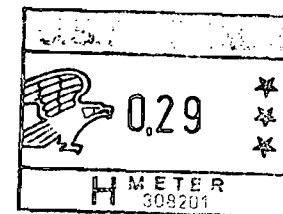
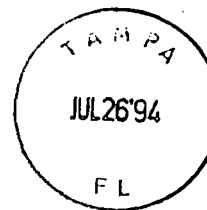
5. We acknowledge that the EPA has proposed to use the 4500 BTU per pound figure and steam flows in their proposed NSPS. It is our understanding, however, that they are simply using it to characterize the incinerator's capacity--not as surrogate for daily throughput. We concur that steam flow may be a more practical means of monitoring the source's potential emissions, but we feel you must not accept a procedure which will routinely underpredicts the amount of waste burned.

Thanks for the opportunity to provide input and please keep us advised.

bm

**Environmental Protection Commission
of
Hillsborough County**

1900 9th Avenue
Tampa, Florida 33605



Ms. Teresa Heron
Division of Air Resources Management
Florida Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400



P 274 010 449

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985

U.S.G.P.O. 1985-480-794

Mr. Gary K. Crane	
Ogden Martin Systems	
Street and No. 40 Lane Road, CN 2615	
P.O., State and ZIP Code Fairfield, NJ 07007-2615	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 02-25-88 PSD-FL-121 Hillsborough County	

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:

Mr. Gary K. Crane
Ogden Martin Systems
40 Lane Road, CN 2615
Fairfield, NJ 07007-2615

4. Article Number

P 274 010 449

5. Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED**.

5. Signature - Addressee

X *[Signature]*

6. Signature - Agent

X

7. Date of Delivery

3/28/88

8. Addressee's Address (ONLY if requested and fee paid)

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RECEIVED

MAR 30 1988



PENALTY FOR PRIVATE
USE, \$300

RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

DER. BAQM
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

ATTN: M. JANES

**OGDEN MARTIN SYSTEMS
OF HILLSBOROUGH INC.**

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000

PM
8 March 1988
West Caldwell, NJ

File Copy



AN OGDEN COMPANY

RECEIVED

MAR 11 1988

DER-BAQM

March 7, 1988

Mr. Hamilton Owen
Florida Department of Environmental Regulation (DER)
2600 Blairstone Road
Tallahassee, FL 32399-2400

Subject: Hillsborough County Resource Recovery Facility
PSD Renewal

As discussed on Thursday, March 3, 1988, please find attached various PSD related documents. Of particular concern is the letter on PSD Permit No. FL-121 which cites a March 31, 1988 expiration date for that permit, approving our requested NO_x and H_2SO_4 limit modification. This letter is to request DER's confirmation of our conversation that no additional action is needed on Ogden's part to extend this PSD permit since the Florida Site Certification (as filed August 31, 1984) is effective for the life of the Facility. If any additional follow-up action is needed, please let me know at your earliest convenience as the March 31st date is rapidly approaching.

Please feel free to call me or Joe Treshler at (813) 684-5688 if you have any questions.

Sincerely yours,

OGDEN MARTIN SYSTEMS, INC.

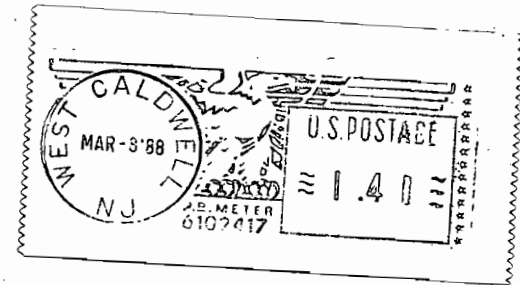
Gary K. Crane

Gary K. Crane, Ph.D.
Vice President
Environmental Permitting

GKC:sh
Attachs.

cc: Clair H. Fancy, Florida DER (all w/attachs.)
J. Glen, OMS Hillsborough
J. Treshler, OMS Hillsborough
D. Strobbridge, CDM
D. Smith, Hillsborough
T. Smith, Hillsborough

*This is one of those
that needed Site Certification
and Federal PSD permit.
They do not need operating permit
need to write him a letter
explaining this. Have engineers
(Pradep) call them, call EPA,
and check with Betty and
draft letter for my sig
by Friday March 25th*



first class

**OGDEN MARTIN
SYSTEMS, INC.**

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615

G. Crane



AN OGDEN COMPANY

Clair H. Fancy
Florida Department of Environmental Regulation
(DER)
2600 Blainstone Road
Tallahassee, FL 32399-2400



NOV 2 1987

4APT/APB-am

PM
2 Nov. 1987
Atlanta, GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

File Copy

DER

NOV 4 1987

BAQM

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-2400

Re: Hillsborough County PSD-FL-120¹²¹

Dear Mr. Fancy:

This is to acknowledge receipt of your October 14, 1987, PSD final determination for modifications at the above referenced facility. We have reviewed the changes made to the draft permits submitted to EPA on July 14, 1987, and find them to be in accordance to our recommendations of September 11, 1987. We, therefore, concur on your final determination and the permits issued to Hillsborough County.

We will retain copies of the determinations and permits for our records.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

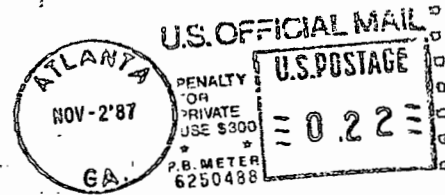
Copied: CHF/BT

Barry Andrews
Jon Rogers

} 11/6/87

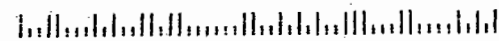
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300
AIR-4



Mr. C. H. Fancy, P.E., Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-2400

11/6
C.H.F. > FYI
P.B. > Thanks
(4)



P 274 007 666

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Richard W. Seelinger	
Ogden Martin Sys. of Hills.	
Street and No.	
40 Lane Road, CN 2615	
P.O., State and ZIP Code	
Fairfield, NJ 07007-2615	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed: 10/14/87	
Fed. Permit: PSD-FL-121	

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

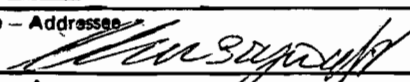
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- ☒ Show to whom, date and address of delivery.
- ☐ Restricted Delivery.

3. Article Addressed to: Richard W. Seelinger
Ogden Martin Sys. of Hills. Co., Inc.
40 Lane Road, CN 2615
Fairfield, NJ 07007-2615

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 274 007 666

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X 

6. Signature - Agent
X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS



PENALTY FOR PRIVATE
USE, \$300

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RETURN
TO **DE R**

OCT 23 1987

BAQM

ATTN: M. JANES

Department of Environmental Regulation

(Name of Sender)

Bureau of Air Quality Management

2600 Blair Stone Road

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

Tallahassee, FL 32399-2400

(City, State, and ZIP Code)

COMMISSION
RODNEY COLSON
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
HAVEN POE
JAMES D. SELVEY
PICKENS C. TALLEY II



PM
Federal Express
Airbill # 676269086
10/2/87

File Copy
ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

October 2, 1987

Mr. Clair Fancy, P.E., Deputy Chief
Florida Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Hillsborough County RRF
RE: Proposed PSD Permit No. PSD-FL-121

Dear Mr. Fancy:

Thank you for still allowing our Agency the opportunity to comment on the Bureau's proposed permit for our county's resource recovery facility at Faulkenburg Road.

Our comments on the proposed permit are as follows:

1. Proposed specific condition 1.b. states PM emissions from the ash handling facility shall not exceed 1.63 pounds per hour. Furthermore, condition 1.c.(1) mentioned Method 5 requirements on this source are waived by limiting the emissions to 5% opacity pursuant to Section 17-2.700(3)(d), F.A.C..

We recommend the above statements be changed to read:

1.b. In accordance with Subsection 17-2.650(2)(c)11., b., F.A.C., the maximum allowable emissions for the ash handling baghouse based on design flow of 9500 ACFM shall not exceed:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/yr</u>	<u>Emission Limitation</u>
Particulate Matter	2.44	10.7	0.03 gr/dscf

Visible Emissions

None (visible emissions less than or equal to 5% opacity)

1.c.(1) Change last sentence of first paragraph to: "EPA Method 5 testing requirements on the ash handling baghouse exhaust shall be waived pursuant to Section 17-2.700(1)(d)6., F.A.C."

DER

OCT 5 1987

BAQM

BEST AVAILABLE COPY



USE THIS AIRBILL FOR DOMESTIC SHIPMENTS AND FOR SHIPMENTS FROM PUERTO RICO TO THE U.S.A.
FILL OUT PURPLE AREAS. FOR ASSISTANCE, CALL 800-238-5355 TOLL FREE.
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS.

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

1149-3914-5

DATE

10/17/97

From (Your Name) VICTOR SAN AGUSTIN		Your Phone Number (Very Important) (407) 711-1111	
Company EPCORC		Department/Floor No. 2nd	
Street Address HIGHWAY 71ST STREET			
City TALLAHASSEE		State FL	
AIRBILL NO. 676269086		ZIP Code Required For Correct Invoicing 32301	

To (Recipient's Name) CLARK FANCY, PE.		Recipient's Phone Number (Very Important) (904) 418-1541	
Company 1001 Air Quality Management		Department/Floor No. 3rd Floor	
Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result in Extra Charge.) 3001 CLARK STONE ROAD, TOWN TOWNSHIP, FLORIDA			
City TALLAHASSEE		State FLORIDA	
ZIP Code Required For Correct Invoicing 32301		ZIP Street Address Zip Required (No P.O. Box Zip Code) 32301	

3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE)
HCKK HED0310 PD PERMIT COMMENTS

PAYMENT ☒ Bill Shipper ☐ Bill Recipient's FedEx Acct. No. ☐ Bill 3rd Party FedEx Acct. No. ☐ Bill Credit Card
☐ Cash ☐ FedEx Acct. No. or Major Credit Card No.

HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS STATION:
Street Address (See Service Guide or Call 800-238-5355)

City _____ State _____

ZIP Code of Street Address Required _____

Emp. No. _____ Date _____

☐ Cash Received
☐ Return Shipment
☐ Third Party ☐ Chg. To Del. ☐ Chg. To Hold

Street Address _____

City _____ State _____ Zip _____

Received By: _____

X Date/Time Received _____ FedEx Employee Number _____

PART #2041738900
FEC-S-750-25
REVISION DATE 2/85
PRINTED U.S.A. NCR

4 SERVICES CHECK ONLY ONE BOX

1 ☒ **PRIORITY 1**
Overnight Delivery Using Your Packaging
12" x 15 1/2"

2 ☐ **COURIER-PAK OVERNIGHT ENVELOPE**
12" x 15 1/2"

3 ☐ **OVERNIGHT BOX**
12 1/2" x 17 1/2" x 3"

4 ☐ **OVERNIGHT TUBE**
38" x 6" x 6"

5 ☐ **STANDARD AIR**
Delivery not later than second business day

6 ☒ **OVERNIGHT LETTER**
(Our Packaging) 9" x 12"

7 ☐ **RESTRICTED ARTICLES SERVICE** (P. 1 and Standard Air Packages only. Extra charge applies.)

8 ☐ **CONSTANT SURVEILLANCE SERVICE (CSS)**
(Extra charge applies.)

9 ☐ **DRY ICE** _____ Lbs. _____

10 ☐ **OTHER SPECIAL SERVICE** _____

11 ☐ **SATURDAY PICK-UP OR SATURDAY DROP-OFF**
(Extra charge applies.)

12 ☐ **HOLD FOR PICK-UP** Give the Federal Express address where you want package held in Section II at right.

13 ☒ **DELIVER WEEKDAY**

14 ☐ **DELIVER SATURDAY** (Extra charge applies.)

15 ☐ **RESTRICTED ARTICLES SERVICE** (P. 1 and Standard Air Packages only. Extra charge applies.)

16 ☐ **CONSTANT SURVEILLANCE SERVICE (CSS)**
(Extra charge applies.)

17 ☐ **DRY ICE** _____ Lbs. _____

18 ☐ **OTHER SPECIAL SERVICE** _____

19 ☐ **SATURDAY PICK-UP OR SATURDAY DROP-OFF**
(Extra charge applies.)

PACKAGES	WEIGHT	YOUR DECLARED VALUE	OVER SIZE
Total	Total	Total	

Received At
☐ Shipper's Door
☐ Regular Stop
☐ On-Call Stop
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Federal Express Corp. Employee No. 30352

Date/Time For Federal Express Use 10/17/97

RECIPIENT'S COPY

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615
(201) 882-9000



AN OGDEN COMPANY

October 1, 1987

HC-0964L
C-1005

Ms. Maggie Janes
State of Florida
Florida Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DER
OCT 2 1987
BAQM

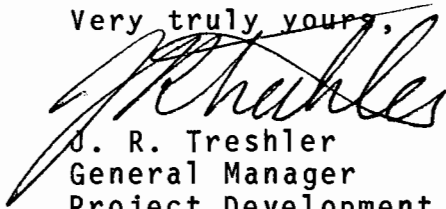
Subject: Original Affidavit and Public Notice

Dear Ms. Janes:

Please find enclosed the original Affidavit and Public Notice as it appeared in the Tampa Tribune 7/19/87 for the Hillsborough County Solid Waste Energy Recovery Project PSD Permit.

We thank you for bringing this matter to our attention.

Very truly yours,


J. R. Treshler
General Manager
Project Development
and Operations

JRT:hn
Attachment

cc: File 5.1

RECIPIENT'S COPY

FEDERAL EXPRESS **QUESTIONS? CALL 800-238-5355 TOLL FREE.** **AIRBILL NUMBER 4330843930**

DATE 10/1/87

15 724 CN

30

1 **FROM (YOUR NAME)** **J. R. FRESHLER** **YOUR PHONE NUMBER (VERY IMPORTANT)** **4330843930**

2 **TO (RECIPIENT'S NAME)** **MS. MAGGIE JAMES** **RECIPIENT'S PHONE NUMBER (VERY IMPORTANT)** **4330843930**

COMPANY **OGDEN PROJECTS INC** **DEPARTMENT/FLOOR NO.**

STREET ADDRESS **40 LANE RD** **EXACT STREET ADDRESS (USE OF P.O. BOXES OR P.O. ZIP CODES WILL DELAY DELIVERY AND RESULT IN EXTRA CHARGE.)**

CITY **FAIRFIELD** **STATE** **NJ** **ZIP REQUIRED FOR CORRECT INVOICING** **07003**

3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE) **1015**

4 DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED

1 PRIORITY 1 - OVERNIGHT DELIVERY ☒ **2 DELIVER SATURDAY** ☐ **3 DANGEROUS GOODS** ☐ **4 CONSTANT SURVEILLANCE SERVICE (CSS)** ☐ **5 DRY ICE** ☐ **6 OTHER SPECIAL SERVICE** ☐ **7 SUNDAY PICK-UP** ☐

5 SERVICE COMMITMENT **PRIORITY 1 - Delivery is scheduled every next business morning in most locations. It may take two or more business days if the destination is outside our primary service area.** **STANDARD AIR - Delivery is generally next business day or not later than second business day. It may take three or more business days if the destination is outside our primary service area.**

6 PAYMENT ☐ Bill Sender ☐ Bill Recipient's FedEx Acct. No. ☐ Bill 3rd Party FedEx Acct. No. ☐ Bill Credit Card

7 YOUR DECLARED VALUE **8 WEIGHT** **9 PACKAGES** **10 TOTAL**

8 ZIP CODE OF STREET ADDRESS REQUIRED **9 EMP. NO.** **10 DATE**

11 CASH RECEIVED **12 RETURN SHIPMENT** **13 THIRD PARTY** **14 CHG TO DEL.** **15 CHG TO HOLD**

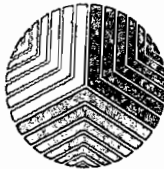
16 STREET ADDRESS **17 CITY** **18 STATE** **19 ZIP**

20 RECEIVED BY **21 DATE/TIME RECEIVED** **22 FED-EX EMPLOYEE NUMBER**

23 PART #106001 **24 FEC-S-751-1000** **25 REVISION DATE** **26 10/86** **27 PRINTED U.S.A. GBFE**

OGDEN MARTIN SYSTEMS OF HILLSBOROUGH, INC.

40 LANE ROAD
CN 2615
FAIRFIELD, NEW JERSEY 07007-2615



AN OGDEN COMPANY

Ms. Maggie Janes
Florida DER

Original Affidavit and Public Notice
for Hillsborough County

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough

ss.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller 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 STATE OF FLORIDA DEPARTMENT OF
PROPOSED AGENCY ACTION ON PERMIT
APPLICATION

was published in said newspaper in the issues of
JULY 19, 1987

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 publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

Sworn to and subscribed before me, this 19th day
of JULY, A.D. 1987.

(SEAL)

Notary Public, State of Florida
My Commission Expires Nov. 23, 1990
Bonded Thru Troy Fain - Insurance Ins.

The application 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
Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Dept. of Environmental
Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
Hillsborough County
Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605

Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as at the Department's Tal-
lahassee address. All comments
mailed within 30 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.

3268

7/19/87

State of Florida
Department of
Environmental Regulation
Notice of Proposed Agency
Action on Permit Application
The Department of Environ-
mental Regulation gives no-
tice of its intent to issue a per-
mit to Hillsborough County to
increase the allowable
nitrogen oxides, sulfuric acid
mist, and particulate
emissions from their existing
energy recovery (municipal
solid waste incineration) facil-
ity. The facility is located in
Hillsborough County, approx-
imately two miles east of
Tampa on the County's
Falkenburg Road site. A de-
termination of best available
control technology (BACT)
was required.

This application was re-
viewed under Florida Adminis-
trative Code Rules 17-2.500,
Prevention of Significant
Deterioration. Emissions of
nitrogen oxides, sulfuric acid
mist, and particulates will in-
crease by 739,289, and 7 tons
per year, respectively. The al-
lowable emissions of the other
pollutants are not being in-
creased. The Department has
completed a study of the po-
tential ambient air impact due
to the increase in emissions.
Based on this study, the De-
partment has reasonable as-
surance that the increase in
emissions will not cause or
contribute to an exceedance
of the ambient air quality stan-
dards for these pollutants. No
PSD increment analysis is re-
quired for this modification.

Persons whose substantial
interests are affected by the
department's proposed permit-
ting decision may petition for
an administrative proceeding
(hearing) in accordance with
Section 120.57, Florida Stat-
utes. The petition must con-
form to the requirements of
chapters 17-103 and 28-5, Flori-
da Administrative Code, and
must be filed (received) in the
Office of General Counsel at
the Department at 2600 Blair
Stone Road, Twin Towers Of-
fice Building, Tallahassee, Fl
32399-2400, within fourteen
(14) days of publication of this
notice. Failure to file a request
for hearing within this time
period shall constitute a waiver
of any right such person
may have to request an ad-
ministrative determination
(hearing) under Section 120.57
Florida Statutes.

If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agency
action. Accordingly, the
Department's final action may
be different from the position
taken by it in this preliminary
statement. Therefore, persons
who may not object to the pro-
posed agency action may wish
to intervene in the pro-
ceeding. A petition for inter-
vention must be filed pursuant
to Model Rule 28-5.207 at least
five (5) days before the final
hearing and be filed with the
hearing officer if one has
been assigned at the Division of

Administrative Hearings, De-
partment of Administration,
2009 Apalachee Parkway, Tal-
lahassee, Florida 32399-2400. If
no hearing officer has been
assigned, the petition is to be
filed with the Department's
Office of General Counsel,
2600 Blair Stone Road, Tal-
lahassee, Florida 32399-2400.
Failure to petition to intervene
within the allowed time frame
constitutes a waiver of any
right such person has to re-
quest a hearing under Section
120.57, Florida Statutes.



United States Department of the Interior
FISH AND WILDLIFE SERVICE

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

IN REPLY REFER TO:

SEP 22 1987

DER
SEP 28 1987
BAQM

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

We appreciate the opportunity to review and comment on the Technical Evaluation and Preliminary Determination for the proposed modification of the Prevention of Significant Deterioration permit for the Hillsborough County Resource Recovery facility. The Hillsborough County facility, located near Tampa, Florida, is approximately 80 km south of Chassahowitzka National Wildlife Refuge, a class I air quality area administered by the U.S. Fish and Wildlife Service. Although we do not expect resulting emission increases from the proposed permit modifications to significantly impact the air quality or air quality related values of the refuge, we have several comments regarding the proposed modifications. These comments are discussed in the enclosed technical review document.

If you have any questions regarding our comments please contact Wayne King of our Air Quality staff at 303-969-2806.

Sincerely,

Nelson B. Kverno
Nelson B. Kverno
Acting Regional Director

Enclosure

copied:

B. Andrews
T. Rogers
P. Raval
F. Campbell, HCEPC
CHF/DT

9-24-87 pen

Atty Gen,

Copied Prodey, Tom,
Barny, & CHF/RT. Also,
HCEPC - J. Campbell,

PSD-FC-121

RJR

9-28-87

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
POST OFFICE BOX 25486
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300



POSTAGE AND FEES PAID
U.S. DEPARTMENT OF
THE INTERIOR
INT-423



Mr. Bill Thomas
Bureau of Air Quality Mgmt
Department of Environmental Reg
Dunn Somers Office Building
2600 Blair Stone Road
Tallahassee, FL 32379-2400

We request that you submit copies of the final determination, which will address our concerns above, and permit when they are issued. If you have any questions, you may contact me or Wayne J. Aronson of my staff at (404) 347-2864.

Sincerely,

Wayne J. Aronson / Acting for

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. Roger P. Stewart, Director
Hillsborough County Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

Mr. William A. Gillen, Jr.
P.O. Box 3324
Tampa, Florida 33601

Copies: *Clair Jany*
Barry Andrews } 9/21/87 *mm*
Produce Canal

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300
AIR-4

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
~~2600 Blair Stone Road~~
Tallahassee, FL 32301-2400

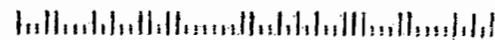


U.S. OFFICIAL MAIL

PENALTY
FOR
PRIVATE
USE \$300
*
*
P.B. METER
6250488

U.S. POSTAGE

0.22



Mr. C. H. Fancy, P.E.
August 14, 1987
Page 3

OMSH recommends that paragraph three of the first page of the permit itself be reworded to segregate particulates from nitrogen oxides and sulfuric acid mist, in order to reflect that these pollutants are emitted from different parts of the plant. It is recommended that the first sentence be reworded to read as follows:

This permit modification pertains to the increases of nitrogen oxides and sulfuric acid mist from the stack and the emission of particulates from the ash residue dust suppression baghouse.

The second sentence of the third paragraph on the first page of the permit needs to be reworded to reflect acceptance of the increased emissions for sulfuric acid mist. As the second sentence presently reads, only specific conditions 1.a.(3), 1.b., and 1.c.(1), are being modified. None of these sections deals with emissions of sulfuric acid mist. Since the third sentence states that all conditions other than the specific conditions addressed in paragraph two remain unchanged, the combination of the second and third sentences does not reflect approval of the increase in sulfuric acid mist.

Sincerely,



J.R. Treshler
Senior Project Manager

JRT:hn

cc: Mr. Bill Thomas

Copied: CHF/BT
Barry Andrews



QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL NUMBER

2873586074

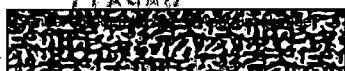
DATE

8/14/87

59

F

00



AIRBILL NUMBER

2873586074

From (Your Name)

J. R. TRESHLER

Your Phone Number (Very Important)

()

Company

GREEN PROJECTS INC

Street Address

40 LANE 40

City

State

ZIP Required For Correct Invoicing

TALLAHASSEE

FL

32399-2400

To (Recipient's Name)

C. H. FANCY, P.E.

Recipient's Phone Number (Very Important)

()

Company

BUREAU AIR QUALITY MGMT

Department/Floor No.

FLORIDA DEPT ENVIRONMENTAL REGULATION

Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result In Extra Charge.)

TWIN TOWERS OFFICE BLDG.

2600 Blair Stone Rd.

State

ZIP Street Address Zip Required

Tallahassee, Florida

32399-2400

3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)

HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS LOCATION:
Street Address (See Service Guide or Call 800-238-5355)

Federal Express Use

PAYMENT ☒ Bill Sender ☐ Bill Recipient's FedEx Acct. No. ☐ Bill 3rd Party FedEx Acct. No. ☐ Bill Credit Card☐ Cash

City

State

Base Charges

Declared Value Charge

Origin Agent Charge

4 SERVICES - CHECK ONLY ONE BOX

1 ☒ **PRIORITY 1** Overnight Delivery (Using Your Packaging)
☒ **OVERNIGHT LETTER*** (Our Packaging) 9 1/2" x 12 1/2"2 ☐ **Courier-Pak Overnight Envelope*** 12" x 15 1/2"3 ☐ **Overnight Box** 12 1/2" x 17 1/2" x 3" A ☐4 ☐ **Overnight Tube** 38" x 6" x 6" B ☐

*Declared Value Limit \$100.

STANDARD AIR5 ☐ Delivery not later than second business day**SERVICE COMMITMENT**

PRIORITY 1 - Delivery is scheduled early next business morning in most locations. It may take two or more business days if the destination is outside our primary service areas.

STANDARD AIR - Delivery is generally next business day or not later than second business day. It may take three or more business days if the destination is outside our primary service areas.

DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED

1 ☐ **HOLD FOR PICK-UP** (Fill in Section H at right)2 ☐ **DELIVER WEEKDAY**3 ☐ **DELIVER SATURDAY** (Extra charge)4 ☐ **DAANGEROUS GOODS** (P-1 and Standard Air Packages only. Extra charge)5 ☐ **CONSTANT SURVEILLANCE SERVICE (CSS)** (Extra charge) (Do Not Complete Section 3)6 ☐ **DRY ICE** Lbs.7 ☐ **OTHER SPECIAL SERVICE**8 ☐9 ☐ **SATURDAY PICK-UP** (Extra charge)10 ☐

PACKAGES WEIGHT YOUR DECLARED VALUE OVER SIZE

LBS

LBS

LBS

LBS

Total Total Total

Received At: 1 Regular Stop 2 On-Call Stop 3 Drop Box 4 B.S.C. 5 Station

Federal Express Corp./Employee No.

Date/Time Received

FedEx Employee Number

Date/Time Received

FedEx Employee Number

ZIP Zip Code of Street Address Required

Emp. No.

Date

☐ Cash Received☐ Return Shipment☐ Third Party ☐ Chg. To Del. ☐ Chg. To Hold

Street Address

City

State

Zip

Received By:

X

Date/Time Received

FedEx Employee Number

Other

Total Charges

PART #108001
FEC-S-751-1000
REVISION DATE 10/86
PRINTED U.S.A. GBFE

Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.

Signature:

RECIPIENT'S COPY

P 408 531 208

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

Mailed to Richard W. Seelinger Ogden Martin Sys. of Hil	
Street and No. 40 Lane Road, CN 2615	
P.O., State and ZIP Code Fairfield, NJ 07007-2615	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 07/14/87 PSO-FL-121	

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- ☒ Show to whom, date and address of delivery.
- ☐ Restricted Delivery.

3. Article Addressed to:
Mr. Richard W. Seelinger
Ogden Martin System of
Hillsborough County Inc.
40 Lane Road, CN 2615
Fairfield, New Jersey 07007-2615

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 531 208

Always obtain signature of addressee or agent and
DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X *Scatter*

7. Date of Delivery
7/17/87

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS



PENALTY FOR PRIVATE
USE, \$300

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RETURN
TO



DER

Department of Environmental Regulation

Bureau of Air Quality Management

2600 Blair Stone Road

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

JUL 20 1987 Tallahassee, Florida 32399-2400

(City, State, and ZIP Code)

BAQM

DRAFT

DEPARTMENT OF COMMUNITY AFFAIRS

DATE

BY: _____
THOMAS PELHAM, SECRETARY
LAWRENCE KEESEY, GENERAL COUNSEL
2572 Executive Center Circle, East
Tallahassee, Florida 32399

FLORIDA PUBLIC SERVICE COMMISSION

DATE

BY: _____
KATIE NICHOLS, CHAIRMAN
MICHAEL TWOMEY, ASSISTANT COUNSEL
101 East Gaines Street
Tallahassee, Florida 32399-2400

HILLSBOROUGH COUNTY

DATE

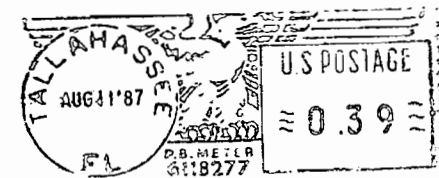
BY: _____
DAVID S. DEE
Carlton, Fields, Ward, Emmanuel,
Smith, Cutler, & Kent, P.A.
Post Office Drawer 190
Tallahassee, Florida 32302

and

JOE HORN MOUNT
County Attorney
Post Office Box 1110
Tampa, Florida 33601

DSD/vc:Hills-RR4

CARLTON, FIELDS, WARD, EMMANUEL, SMITH, CUTLER & KENT, P.A.
P.O. DRAWER 190
TALLAHASSEE, FLORIDA 32302



BARRY ANDREWS
DER
BUREAU OF AIR QUALITY MANAGEMENT
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399

