

-file-

From: Hauck, Paul [mailto:HauckPL@cdmsmith.com]
Sent: Friday, March 09, 2012 1:59 PM
To: Sheplak, Scott
Cc: JohnsonN@HillsboroughCounty.ORG; berryp@hillsboroughcounty.org; Gorrie,Jason
Subject: RE: Hillsborough County Resource Recovery Facility (HCRRF) - Title V Air Operation Permit Renewal, Project Numbers 0570261-014-AV & -015-AC/PSD-FL-121D - pre-draft

Scott, based upon today's readings of the dp gage installed on the wet scrubber, 8.0" +/- 1.5" would be more appropriate.

Thanks for allowing us to provide input on this matter.

Paul L. Hauck, P.E.
Environmental Engineer
CDM Smith
1715 N. Westshore Boulevard, Suite 875
Tampa, Florida 33607
(813) 281-2900 (office)
(813) 262-8840 (direct)
(813) 760-2860 (mobile)
hauckpl@cdmsmith.com
www.cdmsmith.com

From: Hauck, Paul [mailto:HauckPL@cdmsmith.com]
Sent: Tuesday, March 06, 2012 3:06 PM
To: Sheplak, Scott
Cc: jgorrie@covantaenergy.com; JohnsonN@HillsboroughCounty.ORG; berryp@hillsboroughcounty.org
Subject: RE: Hillsborough County Resource Recovery Facility (HCRRF) - Title V Air Operation Permit Renewal, Project Numbers 0570261-014-AV & -015-AC/PSD-FL-121D - pre-draft

Scott, thanks for the summary of your responses. As noted in your e-mail, we still have one more time to offer any additional comments or suggestions on the few remaining items. As a follow-up to the comment on page III.C.-1, Paragraph C.3. Wet Scrubber Controls, see below e-mail correspondence which was shared with me today by Jason Gorrie of Covanta Hillsborough.

Thanks for the opportunity to comment in advance, we are looking forward to your draft permit.

Paul L. Hauck, P.E.
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(813) 760-2860 (mobile)
hauckpl@cdmsmith.com
www.cdmsmith.com

From: Chardo,Kristen [mailto:KChardo@CovantaEnergy.com]
Sent: Monday, October 19, 2009 4:26 PM
To: James.Burkholder@dep.state.fl.us
Cc: Velasco, Robert; Crellin, William; Gorrie,Jason
Subject: Covanta Hillsborough -- Whirl-Wet Operation

James,

Per our conversation, Covanta Hillsborough would appreciate the Department's guidance on the following:

Section 3, C (3) of PSD-FL-369B requires that the Whirl-Wet Dust Collector (EU 112) be operated "...to control the water level to maintain a differential pressure (dp) of 8.0 +/- 0.5". During initial operations of the Whirl-Wet system, Covanta engineers have observed a fluctuation of +/- 1.5" dp. After speaking with an engineer representing the manufacturer (Tri-Mer Corporation) of the Whirl-Wet, Covanta has been informed that dp "fluctuations are normal for the unit...and are of little concern" (please see email correspondence below).

I understand that the permitting language is handled in Tallahassee, and we will address this concern in the Title V application; however, in the meantime, the Department's advice on operation of the Whirl-Wet is appreciated.

Sincerely,
Kristen Chardo
Environmental Compliance Specialist



Covanta Lee
10500 Buckingham Road
Fort Myers, FL 33905
(239) 337-2200 ext 231
(239) 410-3313 (cell)
www.CovantaHolding.com

 Please consider the environment before printing this email.

From: Todd Ainsworth [<mailto:tainsworth@tri-mer.com>]
Sent: Monday, October 19, 2009 2:35 PM
To: Pliska, Kevin
Subject: FW: Covanta Hillsborough -- whirl wet
Importance: High

Kevin,

Per our recent conversation concerning the Tri-Mer Whirl-Wet fluctuations in the differential pressure, we are pleased to offer the following information.

The fluctuations are normal for the unit. The set points should be set at 8" and at 9". The fluctuations are of little concern.

If we can be of further help please feel free to give us a call.

Todd Ainsworth
Sales Engineer

Sheplak, Scott

file

From: Sheplak, Scott
Sent: Wednesday, December 21, 2011 10:02 AM
To: 'Hauck, Paul'
Subject: RE: Title V Air Operation Permit Applications

Paul L. Hauck:

I am considering today (12/21/11) to be the day the requested additional information was submitted. I hope that you and your family have a peaceful, Merry Christmas!

Sincerely,

Scott M. Sheplak

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

From: Hauck, Paul [<mailto:HauckPL@cdm.com>]
Sent: Wednesday, December 21, 2011 8:42 AM
To: Sheplak, Scott
Cc: Hauck, Paul
Subject: RE: Title V Air Operation Permit Applications

Hi Scott,

We had a minor glitch yesterday, and I am just now transmitting the documents via EPSAP program, but it will not accept files larger than 4 MB. Therefore I am going to break them up into three files and submit in pieces.

Meanwhile, as a reference copy, attached is the complete response in one pdf file.

Paul L. Hauck, P.E.
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-----Original Message-----

From: Sheplak, Scott [<mailto:Scott.Sheplak@dep.state.fl.us>]
Sent: Tuesday, December 20, 2011 9:07 AM
To: Hauck, Paul; JohnsonN@HillsboroughCounty.ORG; ghoag@covantaenergy.com
Cc: jgorrie@covantaenergy.com; thuffman@covantaenergy.com; Strobridge, Daniel; Crisp, Carolyn; Arif, Syed
Subject: RE: Title V Air Operation Permit Applications

Good morning,



1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
tel: +1 813 281-2900
fax: +1 813 288-8787

December 20, 2011

Mr. Scott M. Sheplak, P.E.
DEP - Division of Air Resource Management Office of Permitting and Compliance
Key Industries - Minerals & Metals
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Revised Application for Renewal of Title V Air Operation Permit Applications
Permit No. 0570261-006-AV
Hillsborough County Resource Recovery Facility (HCRRF)

Dear Mr. Sheplak:

Camp Dresser & McKee Inc. (CDM) on behalf of the Hillsborough County Public Utilities Department (County) is pleased to submit the revised DEP Application Form 62-210.900(1) in response to the request for additional information (RAI), dated September 22, 2011 for Title V permit renewal. The revised application contains all the information requested as follows:

1. Completed emissions unit subsection III. (pages 15-28) of the DEP Form 62-210.900(1) for the existing emissions units at the HCRRF;
2. Specific facility-wide additional information from subsection I.C. (page 13) of DEP Form 62-210.900(1):
 - a. List of Insignificant Activities;
 - b. Identification of Applicable Requirements; and
 - c. Compliance Report and Plan.
3. In addition to the above, the revised Title V application includes two new RICE emission units (diesel driven fire pump at the HCRRF and four (4) emergency diesel-fired generators at the adjacent Falkenburg AWWTP) due to the recently promulgated NESHAP standards.

Please do not hesitate to contact me at (813) 281-2900 if you have any questions or need additional information.

Sincerely,

Paul Hauck, P.E.
Project Manager
Camp Dresser & McKee Inc.

cc: Patricia Berry, Interim Manger, Solid Waste Management Group,
Nate Johnson, Disposal Process Management Section Manager
Dan Strobridge, CDM
Hari Kapalavai, CDM
Jason Gorrie, Covanta Hillsborough Inc.
File

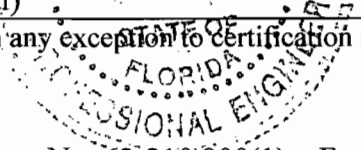


APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Paul Hauck, P.E. Registration Number: 50892
2. Professional Engineer Mailing Address... Organization/Firm: CDM Street Address: 1715 N. Westshore Boulevard, Suite 875 City: Tampa State: Florida Zip Code: 33607
3. Professional Engineer Telephone Numbers... Telephone: (813) 262 - 8860 ext. Fax: (813) 288 - 8787
4. Professional Engineer E-mail Address: hauckpl@cdm.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature <u>Paul J. Hauck</u> 12-20-11 (seal) No. 50892 Date <u>12-20-11</u>

* Attach any exception to certification statement.



From: Hauck, Paul [HauckPL@cdm.com]
Sent: Monday, October 17, 2011 11:57 AM
To: Sheplak, Scott
Cc: Strobridge, Daniel
Subject: RE: Title V Air Operation Permit Application for Renewal - Hillsborough County Resource Recovery Facility (HCRRF)

Greetings Scott,

In recognition of the 2007 update in federal regulation 40 CFR 60, Subpart Db, please remove the natural gas restriction and associated recordkeeping language from HCRRF's PSD permit, PSD-FL-121C (reference Specific Condition Nos. III.B.8., 9. and 17) in the HCRRF Title V Air Operation Permit Application for Renewal.

Thanks for bringing this to our attention.

Paul L. Hauck, P.E.
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(813) 262-8840 (direct)
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hauckpl@cdm.com
www.cdm.com

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

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Friday, October 14, 2011 2:30 PM
To: 'Gorrie,Jason'; Crellin, William
Cc: 'JohnsonN@HillsboroughCounty.ORG'; Huffman,Tyler; Hauck, Paul; Liu, Wei-Ting; Sonawane, Aamod
Subject: RE: Title V Air Operation Permit Application for Renewal - Hillsborough County Resource Recovery Facility (HCRRF)

Jason, that's correct it was a standalone permit. I actually already started an AC/PSD revision document. The AC permit was needed at the time; it likely has already expired. An easy one to fix.

Bill, Good luck to you!

Scott

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

From: Gorrie,Jason [mailto:jgorrie@CovantaEnergy.com]
Sent: Friday, October 14, 2011 2:15 PM
To: 'CrellinWR@cdm.com'; Sheplak, Scott
Cc: 'JohnsonN@HillsboroughCounty.ORG'; Huffman,Tyler; 'HauckPL@cdm.com'; 'LiuWT@cdm.com'; 'SonawaneAS@cdm.com'
Subject: Re: Title V Air Operation Permit Application for Renewal - Hillsborough County Resource Recovery Facility (HCRRF)

Sheplak, Scott

- file -

From: Sheplak, Scott
Sent: Thursday, September 22, 2011 12:16 PM
To: 'Crellin, William'
Cc: 'Nate Johnson (JohnsonN@HillsboroughCounty.ORG)'; 'ghoag@covantaenergy.com'; 'jgorrie@covantaenergy.com'; 'thuffman@covantaenergy.com'; 'Strobridge, Daniel'; 'Crisp, Carolyn'; Arif, Syed; 'Lee, Dianna (Hillsborough County)'
Subject: Title V Air Operation Permit Applications
Attachments: Guidance Memorandum DARM-PER-42.pdf

Tracking:	Recipient	Read
	'Crellin, William'	
	'Nate Johnson (JohnsonN@HillsboroughCounty.ORG)'	
	'ghoag@covantaenergy.com'	
	'jgorrie@covantaenergy.com'	
	'thuffman@covantaenergy.com'	
	'Strobridge, Daniel'	
	'Crisp, Carolyn'	
	Arif, Syed	Read: 9/22/2011 1:27 PM
	'Lee, Dianna (Hillsborough County)'	

Mr. William R. Crellin, Jr., P.E.
Senior Project Manager
Camp Dresser & McKee Inc.
1715 North Westshore Boulevard, Suite 875 Tampa, Florida 33607

Re: Title V Air Operation Permit Applications
Hillsborough County Resource Recovery Facility (HCRRF)

Dear Mr. Crellin:

My oversight, I found were you had checked "renewal" application in the May 9, 2011 application submitted. We will treat that application submission as your application for renewal of Title V air operation permit No. 0570261-006-AV. Thank you for submitting the renewal early (the new deadline was October 16, 2011).

The referenced submitted Electronic Permit Submittal and Processing System (EPSAP) permit application (2310-1) only included information associated with the MWC Unit 4 Expansion project. Early renewal applications must include all of the information required from Rules 62-210.900(1) and 62-213.420(3)&(4), Florida Administrative Code (F.A.C.) for the entire (facility-wide) HCRRF (see attached DEP Guidance Memorandum DAR-PER-42, dated September 25, 2006).

Additional information is needed to make the renewal application complete pursuant to Rule 62-213.420(1)(b)4., F.A.C. The following additional information is needed to process the renewal application:

1. Completed emissions unit subsection III.'s (pages 15-28) of the DEP Form 62-210.900(1) for the other emissions units at the HCRRF.
2. The following specific facility-wide additional information from subsection I.C. (page 13) of DEP Form 62-210.900(1): 1. List of Insignificant Activities; 2. Identification of Applicable Requirements; and, 3. Compliance Report and Plan.

The additional information must be submitted within ninety (90) days or you may provide a written request for an additional period of time to submit the information.

If you should have any questions, feel free to contact me.

Sincerely,

Scott M. Sheplak, P.E.

DEP - Division of Air Resource Management Office of Permitting and Compliance Key Industries - Minerals & Metals
Mail Station #5505 2600 Blair Stone Road Tallahassee, FL 32399-2400

E-mail: scott.sheplak@dep.state.fl.us

Telephone: 850/717-9074



Department of Environmental Protection


Jeb Bush
Governor

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

Colleen M. Castille
Secretary

DARM-PER-42

To: District Air Program Administrators
Local Air Program Administrators
Trina Vielhauer, BAR Chief
Larry George, OPAPM Program Administrator
Rebecca Robinette, Assistant General Counsel

From:  Joseph Kahn, Director
Division of Air Resource Management

Date: September 25, 2006

Subject: Guidance Regarding Early Renewal of Title V Permits

The Division of Air Resource Management ("Division") has reviewed the Title V program rules and determined there is nothing prohibiting the early renewal of a Title V permit. Therefore, a Title V permit can be renewed, either solely as a renewal or concurrently with a revision, prior to the Title V permit's renewal application due date as long as the following criterion are met:

1. The applicant must submit a Title V renewal application containing all of the information required by Rules 62-210.900(1) and 62-213.420(3) and (4), Florida Administrative Code;
2. The applicant must request that the existing Title V permit be "expired" and the existing Title V permit must be expired as explained in the Permitting Action Tree #40;
3. The expiration date of the Title V renewal must be 5 years from the effective date of the Title V renewal;
4. The processing engineer must update ARMS to reflect the expiration of the previous Title V permit and the effective and expiration dates of the Title V renewal.

The Division has also reviewed the acid rain program rules and determined there is nothing prohibiting the early renewal of a Title V permit containing an acid rain part. Therefore, a Title V permit with an acid rain part can be renewed early, as provided above, with the additional requirement that the Title V permit renewal have an effective date of January 1.

An early Title V renewal may be processed using either the Title V parallel review process outlined in DARM-PER-41 or the sequential review process.

"More Protection, Less Process"

Printed on recycled paper.

Sheplak, Scott

From: Sheplak, Scott
Sent: Wednesday, September 21, 2011 2:22 PM
To: Crellin, William
Cc: Nate Johnson (JohnsonN@HillsboroughCounty.ORG); ghoag@covantaenergy.com; jgorrie@covantaenergy.com; thuffman@covantaenergy.com; Strobridge, Daniel; 'Crisp, Carolyn'; Arif, Syed
Subject: RE: DEP Transmittals
Attachments: [Untitled].pdf

Tracking:	Recipient	Delivery
	Crellin, William	
	Nate Johnson (JohnsonN@HillsboroughCounty.ORG)	
	ghoag@covantaenergy.com	
	jgorrie@covantaenergy.com	
	thuffman@covantaenergy.com	
	Strobridge, Daniel	
	'Crisp, Carolyn'	
	Arif, Syed	Delivered: 9/21/2011 2:22 PM

Mr. William R. Crellin, Jr., P.E.
Senior Project Manager
Camp Dresser & McKee Inc.
1715 North Westshore Boulevard, Suite 875 Tampa, Florida 33607

Re: Title V Air Operation Permit Applications
Hillsborough County Resource Recovery Facility

Dear Mr. Crellin:

The Hillsborough County Resource Recovery Facility (HCRRF) is located in Hillsborough County at 350 North Falkenburg Road, Tampa, Florida.

The Electronic Permit Submittal and Processing System (EPSAP) Application Number: 2310-1 referenced in the below e-mail was a Title V air operation permit revision application submitted on June 8, 2010, to include the completed Municipal Waste Combustor (MWC) Unit 4 Expansion project. The submitted EPSAP permit application (2310-1) only included information associated with the MWC Unit 4 Expansion project (a few excerpts are attached).

The current Title V air operation permit, Permit Number 0570261-006-AV expires on May 28, 2012. The renewal application due date shown in the current permit is "November 30, 2011," however, please note that Rule 62-213.420(1)(a)2., Florida Administrative Code (F.A.C.), changed the renewal application due date to "October 16, 2011." This rule change requires renewal applications to be submitted 225 days prior to expiration instead of the previous 180 days. The deadline to submit the Title V air operation permit renewal application for the entire HCRRF is October 16, 2011.

If you are submitting a renewal early, we need an application to renew the Title V air operation permit for the entire HCRRF. A renewal application must include all of the information required from Rules 62-210.900(1) and 62-213.420(3)&(4), F.A.C. for the entire (facility-wide) HCRRF.

The Department understands that HCRRF would like to combine the revision request with the renewal project.

I hope the Department's recently developed "Instant RICE" and "Instant Fire Pump" tools assisted in your identifying the unit specific applicable requirements for engines and fire pumps, simplifying the "4-Z" (the MACT), "4-I" (an NSPS) and "4-J" (another NSPS) applicability. Thank you for submitting the fire pump information.

We are reviewing the comments on the draft PSD permit revision associated with the (Hg) continuous emission monitoring system (CEMS) provisions for MWC Unit 4.

If you should have any questions, you may contact me:

Sincerely,

Scott M. Sheplak, P.E.

DEP - Division of Air Resource Management Office of Permitting and Compliance Key Industries - Minerals & Metals
Mail Station #5505 2600 Blair Stone Road Tallahassee, FL 32399-2400

E-mail: scott.sheplak@dep.state.fl.us

Telephone: 850/717-9074

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

From: Crisp, Carolyn [<mailto:CrispCA@cdm.com>]

Sent: Tuesday, September 20, 2011 2:55 PM

To: ghoag@covantaenergy.com; jgorrie@covantaenergy.com; thuffman@covantaenergy.com; Nate Johnson (JohnsonN@HillsboroughCounty.ORG); Sheplak, Scott

Cc: Crellin, William; Strobridge, Daniel

Subject: DEP Transmittals

Attached for your records, please find transmittals for Title V Permit Renewal (ESAP Application #2310-1) and PSD Permit Revisions.

Thanks

Carolyn Crisp

CDM

1715 N. Westshore Blvd.

Suite 875

Tampa, FL 33607

813-281-2900



APPLICATION IDENTIFICATION INFORMATION

Home | Application Search | Comments | App. Reports | Admin Reports | Logoff | Help

APPLICATION: HILLSBOROUGH WTE EXPANSION CDM (#2310-1)
FACILITY: HILL. CNTY. SOLID WASTE MGMT. DEPT. (#0570261)

- (+) 100 - Ash Building and Handling
- (+) 106 - Dolomitic Lime Storage Si
- (+) 107 - Municipal Waste Combustor
- (+) 108 - Lime Storage Silo - Unit
- (+) 109 - Reserved
- (+) 110 - Activated Carbon Storage
- (+) 111 - Cooling Tower Cell - Unit
- (+) (NEW) 112 Expanded Ash Handling

Assign Rights or Transfer Application

Edit Application for Sufficiency

Return Application to Applicant for Resubmittal

Application Contact | Owner/Authorized Rep. | Professional Engineer | Responsible Official

Final PE Signature File Authentication Code: 9CDE7CA29368DE4E1AFBE799A714880985CE4973
Select an Option Below to Confirm Receipt of the PE Signature Document: <input type="radio"/> I have NOT received the PE Signature Document. <input checked="" type="radio"/> I have received the PE Signature Document and confirmed that the Signature File Authentication Code shown above exactly matches the one on the PE Signature Document. <input type="radio"/> I have received the PE Signature Document and found that the Signature File Authentication Code shown above does NOT match the one on the PE Signature Document.

View, Edit, or Add Additional Permit Numbers

Permit Number: - -

Is this Application Received? Reviewable

Allow Viewing of this Application on the Internet? Yes No

Application Number: 2310

Applicant's Version: 1

Application Name: HILLSBOROUGH WTE EXPANSION CDM

Application Type: LONG FORM

Purpose of Application: TITLE V AIR OPERATION PERMIT REVISION.

Time Clock Waiver: NO

Date Submitted: 6/9/2010

Applicant's Data Downloaded from ARMS? YES

Applicant Comment: Revise the Title V to include the Unit #4 Expansion.

Responsible Official who Submitted this Application: BARRY BOLDISSAR

View Certification Statements

APPLICATION: HILLSBOROUGH WTE EXPANSION CDM (#2310-1)

FACILITY: HILL. CNTY. SOLID WASTE MGMT. DEPT. (#0570261)

Facility Attachments

Supplemental Item	Electronic File Name	Attachment Description	Electronic Document?	Date Uploaded
FACILITY PLOT PLAN	06150A Site Plan C1005 (Rev 2).pdf	Facility Site Plan	Yes	1/21/2010
OTHER FACILITY INFORMATION	Clarifications to Permit PSD-FL-369B _ 0570261-006-AV.pdf	Request changes to Permit No.PSD-FL-369B and Title V Permit No. 0570261-006-AV	Yes	6/7/2010
PROCESS FLOW DIAGRAM(S)	Unit 4 flow diagram.pdf	Unit #4 Process flow diagrams	Yes	1/21/2010

Emissions Unit Attachments

Emissions Unit: 104 - Waste Water Treatment Plant

Supplemental Item	Electronic File Name	Attachment Description	Electronic Document?	Date Uploaded
DETAILED DESCRIPTION OF CONTROL EQUIPMENT	Wastewater process description.pdf	Wastewater Description	Yes	1/25/2010
OTHER EMISSIONS UNIT INFORMATION	Settling basin layout.pdf	Wastewater system layout	Yes	1/26/2010
PROCESS FLOW DIAGRAM	Wastewater System flow diagram.pdf	Wastewater process flow diagram	Yes	1/25/2010

Emissions Unit: 107 - Municipal Waste Combustor & Auxiliary Burners - Unit #4

Supplemental Item	Electronic File Name	Attachment Description	Electronic Document?	Date Uploaded
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	CEM Testing Report.pdf	CEM Test Reports	Yes	1/22/2010
-->	Unit 4 Emissions Testing Report cont.pdf	Unit 4 air emissions testing (Vol. 2)	Yes	1/22/2010
-->	Unit 4 Emissions Testing Report.pdf	Unit 4 air emissions testing (Vol. 1)	Yes	1/22/2010
-->	4Q09 Submittal.pdf	Unit 4 and Wet Scrubber Test (EU 112) Submittal	Yes	6/7/2010
-->	E Report, Hills Hg Dec 09 (vol 1).pdf	Unit 4 and Wet Scrubber Backup Report (Vol. 1)	Yes	6/7/2010
-->	E Report, Hills Hg Dec 09 (vol 2).pdf	Unit 4 and Wet Scrubber Backup Report (Vol. 2)	Yes	6/7/2010
DETAILED DESCRIPTION OF CONTROL EQUIPMENT	APC process flow description.pdf	APC description	Yes	1/22/2010
-->	Boiler Description.pdf	Boiler Description	Yes	2/9/2010
OTHER EMISSIONS UNIT INFORMATION	boiler and APC drawings.pdf	Boiler and APC drawings	Yes	1/22/2010
PROCEDURES FOR STARTUP AND SHUTDOWN	Boiler Startup.pdf	Boiler Startup	Yes	2/9/2010
-->	Boiler operation and shutdown.pdf	Boiler operation and shutdown	Yes	2/9/2010
PROCESS FLOW DIAGRAM	APC process flow diagram.pdf	APC flow diagram (See Section II Facility flow diagram)	Yes	1/22/2010
-->	Ammonia Process Flow Diagram.pdf	Ammonia flow diagram	Yes	1/22/2010

Emissions Unit: 108 - Lime Storage Silo - Unit #4

Supplemental Item	Electronic File Name	Attachment Description	Electronic Document?	Date Uploaded
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OTHER EMISSIONS UNIT INFORMATION	Silo Baghouse UltraBB-II.pdf	Lime silo baghouse drawings	Yes	2/9/2010
Emissions Unit: 110 - Activated Carbon Storage Silo - Unit #4				
Supplemental Item	Electronic File Name	Attachment Description	Electronic Document?	Date Uploaded
OTHER EMISSIONS UNIT INFORMATION	Carbon silo drawings.pdf	Carbon silo drawings	Yes	1/26/2010
->>	Silo Baghouse UltraBB-II.pdf	Carbon baghouse drawings	Yes	2/9/2010
PROCEDURES FOR STARTUP AND SHUTDOWN	Silo startup and operation.pdf	Silo startup and operation	Yes	2/9/2010
Emissions Unit: 111 - Cooling Tower Cell - Unit #4				
Supplemental Item	Electronic File Name	Attachment Description	Electronic Document?	Date Uploaded
OPERATION AND MAINTENANCE PLAN	Cooling Tower O_M ManualB.pdf	Cooling tower O&M manual	Yes	1/22/2010
OTHER EMISSIONS UNIT INFORMATION	Cooling tower drawing.pdf	Cooling drawing(s)	Yes	1/25/2010
PROCESS FLOW DIAGRAM	Cooling Process Flow Diagram.pdf	Cooling tower process flow diagram	Yes	1/25/2010
Emissions Unit: New - 112 Expanded Ash Handling Building with Wet Scrubbing System				
Supplemental Item	Electronic File Name	Attachment Description	Electronic Document?	Date Uploaded
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	Wet Scrubber system.pdf	Wet scrubber emissions test report	Yes	1/22/2010
OPERATION AND MAINTENANCE PLAN	Wet scrubber O_M.pdf	Wet scrubber O&M manual	Yes	1/22/2010
OTHER EMISSIONS UNIT INFORMATION	Ash Handling Plan1.pdf	Ash building plan	Yes	1/22/2010
->>	Ash Handling Plan1.pdf	Ash handling system	Yes	1/22/2010
->>	Wet Scrubber system.pdf	Wet scrubber system	Yes	1/22/2010
->>	Scrubber differential pressure change.pdf	Wet scrubber different pressure modification	Yes	2/9/2010
PROCEDURES FOR STARTUP AND SHUTDOWN	Ash Handling O_M.pdf	Ash handling O&M manual	Yes	1/22/2010
PROCESS FLOW DIAGRAM	Ash Handling Flow Diagram.pdf	Ash handling process flow diagram	Yes	1/22/2010
Report Completed as of: 9/21/2011 11:58:45 AM				



1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
tel: +1 813 281-2900
fax: +1 813 288-8787
September 20, 2011

RECEIVED
SEP 23 2011
DIVISION OF AIR
RESOURCE MANAGEMENT

Scott M. Sheplak, PE
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Hillsborough County Resource Recovery Facility
Application for Title V Permit Renewal (ESAP Application # 2310-1)

Dear Mr. Sheplak:

This letter is written to confirm that the ESAP Application #22310-1, submitted to FDEP on June 8, 2010, was not only intended to include the new Unit No. 4 municipal waste combustor in the Resource Recovery Facility's Title V Permit, but also to renew the facility wide Title V Permit.

Since making that Application we have determined there are several other issues that we respectfully request to be considered in the Application;

1. The diesel powered engine that powers the fire pump should be added as an Emission Unit under the RICE standards. The Instant RICE software populated with data for this engine is attached.
2. We request that fluoride and beryllium be removed from the list of pollutants regulated. The Resource Recovery Facility does not combust beryllium containing wastes or fluoride containing wastes. Additionally Annual Compliance Tests since the start of Facility commercial operations in 1987 have shown either non-detectable levels of these 2 pollutants or trace amounts several orders of magnitude below the emission limitations.
3. The dolomitic lime storage silo, Emissions Unit No. 106, should be removed. This silo was totally enclosed within the new APC Building as a result of the Expansion project that added municipal waste combustor Unit No. 4.

We look forward to the Department's response.

Sincerely,

William R. Crellin Jr., P.E.
Senior Project Manager
Camp Dresser & McKee Inc.

cc: Dan Strobridge (CDM)
Jason Gorrie (Covanta Energy)
Tyler Huffman (Covanta Energy)

Glenn Hoag (Covanta Energy)
Nate Johnson (Hillsborough County)



Instructions:

- Always answer the questions in order.
- Only orange colored cells should have an answer/choice in them. All others should be left blank.
- Follow the arrows until you have a big green arrow. When you get a big green arrow you are finished!
- The detailed results of the RICE will be on tabs ZZZZ or IIII or JJJJ of this worksheet.
- Contact Andrew Bass (andrew.bass@dep.state.nj.us) with any Errors/Suggestions about the Program.



Input

Are you the Manufacturer or the Owner and Operator of the Fire Pump? ⇨

Owner and Operator
No
No
Yes
235 HP

Is the Fire Pump a temporary replacement unit and located at a stationary source for less than 1 year and has been properly certified as meeting the standards that would be applicable to such engine under the appropriate non-road engine provisions? ⇨

Is your Fire Pump being tested at a stationary RICE test cell/stand? ⇨

Does your facility have the potential to emit 10 or more tons/year of any single hazardous air pollutant or 25 or more tons/year of any combination of hazardous air pollutants?(Area or Major Source) ⇨

What is the Brake HP (Hint: 1 HP = 0.7456 KW) of the stationary Fire Pump? ⇨

* A fire pump is considered to be reconstructed if it meets any of the following conditions:
 (1) The fixed capital cost of the new (after July 11, 2005) components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and
 (2) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act.

When did you commence construction (date the Fire Pump is ordered by the owner or operator) or reconstruction on your stationary Fire Pump (ex. June 12, 2006 = 06/12/06)(All manufacturers use manufacture date)? ⇨

What is the date of manufacture of the Fire Pump? ⇨

What is the Fire Pumps displacement (l/cyl)(Hint: 1 cc = 0.001 l & V# = # cylinders)(If engine is not a new compression Ignition engine use 1 l/c, otherwise obtain information from applicant or manufacturer) ⇨

1/1/1986
1/1/1986
1.30 l/cyl

Emission Limitations	Operating Limitations	Fuel Requirements	Performance Test	Monitoring, Installation, Collection, Operation and Maintenance Requirements	Initial Compliance	Continuous Compliance	Notification Requirements	Recordkeeping Requirements	Reporting Requirements	General Provisions (40 CFR part 63)
63.6602 Table 2c	No Requirements	No Requirements	No Requirements	63.6625(e), (f), (h), (i)	No Requirements	63.6605 63.6640	No Requirements	63.6655 (except 63.6655(c))	Footnote 1 of Table 2c	Yes, except per 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (n).

