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Solid Waste Management Department
Hillsborough County
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Mr. Barry M. Boldissar, Director
Solid Waste Management Department
Hillsborough County
Post Office Box 1110
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Jeb Bush
Governor

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

Colleen M. Castille
Secretary

Certified Mail -- Return Receipt Requested

February 3, 2006

Mr. Barry M. Boldissar
Director
Solid Waste Management Department
Hillsborough County
P.O. Box 1110
Tampa, Florida 33601

Re: DRAFT Title V Air Operation Permit Renewal No. **0570261-006-AV**
Draft Air Construction Permit No. **0570261-008-AC**
Hillsborough County Resource Recovery Facility

Dear Mr. Boldissar:

We have received and reviewed your recent response to our letter requesting additional information relative to your Title V Permit Renewal application. However, we have deemed your application *still incomplete* because of the following outstanding issues:

- The requested revision to the current Title V permit (Appendix F of the renewal application) and concurrent air construction permit (AC) application needs further clarification. Please provide information on what carbon injection system operating parameters are actually used (with supporting data) as the primary indicators of the carbon mass feed rate at the facility. Provide a minimum of five years of historical data, and estimate the effect that the requested change will have on mercury and dioxin/furan potential emissions.

- Mr. Jason M. Gorrie of CDM has indicated that he is aware of a guidance memorandum from EPA that purportedly addressed the averaging time for the carbon injection system operating parameters to support the requested change to the facility's permits. Please provide a copy of this guidance memorandum if available.

- In your letter received on September 21, 2005, you state that "no CAM Plan is required for any pollutant that has a concurrent pre-1990 and post-1990 standard", and refer to the Department's recent permitting action for the Pinellas County Resource Recovery Facility as justification for this conclusion. However, the Department's position is that in cases where the PSD limit (or limits) is more stringent than the Cb (i.e, 40 CFR 60, Subpart Cb) limit for the particular pollutant, a CAM applicability analysis is still required.

- For reference, we have listed below these specific conditions from the current Title V permit. As noted in these conditions, the specified limits are based on both NSPS (40 CFR 60, Subpart Cb) and PSD applicable requirements. Please review each condition and determine if the PSD limit is more stringent than the Cb limit for the condition. *Please provide the detailed computations for all determinations.*

- Please indicate if continuous emissions monitoring systems (CEMS) are to be used to demonstrate compliance for NOx, SO2, and CO emissions limits in the Title V permit. If affirmative, the control devices for these pollutants are exempt from CAM.

- When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Selected Specific Conditions of 0570261-005-AV:

Particulate Matter

C.15. The emission limit for particulate matter contained in the gases discharged to the atmosphere from each MWC unit is 27 milligrams per dry standard cubic meter or 0.012 grain per dry standard cubic foot, corrected to 7 percent oxygen (equivalent to 0.024 lb/MMBtu, heat input and 4.1 lbs/hr) and 17.96 tons/yr.
[40 CFR 60.33b(a)(1)(i) and PSD-FL-121(C)]

Cadmium

C.17. The emission limit for cadmium contained in the gases discharged to the atmosphere from each MWC unit is 0.040 milligrams per dry standard cubic meter, corrected to 7 percent oxygen (equivalent to 3.47E-05 lb/MMBtu, heat input and 6.00E-03 lb/hr) and 0.026 ton/yr.
[40 CFR 60.33b(a)(2)(i) and PSD-FL-121(C)]

Mercury

C.18. The emission limit for mercury contained in the gases discharged to the atmosphere from each MWC unit is 0.070 milligrams per dry standard cubic meter or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent (equivalent to 1.17E-04 lb/MMBtu, heat input or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent and 0.020 lb/hr or 15 percent of the potential mercury

emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent) and 0.087 ton/yr.
[40 CFR 60.33b(a)(3); Rule 62-296.416(3)(a)1., F.A.C.; and, PSD-FL-121(C)]

Lead

C.22. The emission limit for lead contained in the gases discharged to the atmosphere from each MWC unit is 0.44 milligrams per dry standard cubic meter, corrected to 7 percent oxygen (equivalent to 3.81E-04 lb/MMBtu, heat input and 0.065 lb/hr) and 0.288 ton/yr.
[40 CFR 60.33b(a)(4) and PSD-FL-121(C)]

Sulfur Dioxide (If CEMS used for compliance, exempt from CAM.)

C.23. The emission limit for sulfur dioxide contained in the gases discharged to the atmosphere from each MWC unit is 29 parts per million by volume or 25 percent of the potential sulfur dioxide emission concentration (75-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent (equivalent to 0.190 lb/MMBtu, heat input or 25 percent of the potential sulfur dioxide emission concentration (75-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent and 32.86 lbs/hr or 25 percent of the potential sulfur dioxide emission concentration (75-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent) and 143.9 tons/yr. Compliance with this emission limit is based on a 24-hour daily geometric mean.
[40 CFR 60.33b(b)(3)(i) and PSD-FL-121(C)]

Hydrogen Chloride

C.24. The emission limit for hydrogen chloride contained in the gases discharged to the atmosphere from each MWC unit is 29 parts per million by volume or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent (0.099 lb/MMBtu, heat input or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent and 17.00 lbs/hr or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent) and 74.43 tons/yr.
[40 CFR 60.33b(b)(3)(ii) and PSD-FL-121(C)]

Dioxins/Furans

C.25. The emission limit for dioxins/furans contained in the gases discharged to the atmosphere from each MWC unit that do not employ an electrostatic precipitator-based emission control system is 30 nanograms per dry standard cubic meter (total mass), corrected to 7 percent oxygen (equivalent to 2.60E-08 lb/MMBtu, heat input and 4.5E-06 lb/hr) and 1.96E-05 ton/yr.
[40 CFR 60.33b(c)(1)(ii) and PSD-FL-121(C)]

Nitrogen Oxides (If CEMS used for compliance, exempt from CAM.)

C.26. The emission limit for nitrogen oxides contained in the gases discharged to the atmosphere from each MWC unit is 205 parts per million by volume, corrected to 7 percent oxygen, dry basis (equivalent to 0.34 lb/MMBtu, heat input and 58.63 lbs/hr) and 256 tons/yr. Compliance with this emission limit is based on a 24-hour daily arithmetic mean.

Nitrogen oxide emissions from the auxiliary burners are approximately 3.45 lbs/hr and 15.1 tons/yr per unit. These emissions are part of, and not in addition to, combustor emissions. Allowable emissions for MSW combustors include auxiliary burners. This facility is limited to a 10 percent (0.10) or less, total annual gross heat input for natural gas consumption. Auxiliary burners for each MWC unit shall be fired only by natural gas, and consumption of natural gas shall not exceed 104,937,500 cubic feet per MWC unit in any calendar year (i.e., annual capacity factor for natural gas of 10% or less as determined by 40 CFR 60.44b(d)).
[40 CFR 60.33b(d) and PSD-FL-121(C)]

Carbon Monoxide (If CEMS used for compliance, exempt from CAM.)

C.27. The emission limit for carbon monoxide contained in the gases discharged to the atmosphere from each MWC unit is 100 parts per million by volume, measured at the combustor outlet in conjunction with a measurement of oxygen concentration, corrected to 7 percent oxygen, dry basis (equivalent to 0.101 lb/MMBtu, heat input and 17.4 lbs/hr) and 76.26 tons/yr. Calculated as an arithmetic average. Averaging time is a 4-hour block average.
[40 CFR 60.34b(a); Rules 62-212.400(2)(g) and 62-212.400(5), F.A.C.; and, PSD-FL-121(C)]

Sincerely,

for A. A. Linero, P.E.
Program Administrator
Permitting South Section

Cc: Mara Nasca, Southwest District Office
Jason M. Gorrie, P.E., CDM, 1715 North West Shore Blvd., Suite 250,
Tampa, FL 33607-5755