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September 20, 2011

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
Draft Permits Nos. 0570261-013-AC/PSD-FL-369C and 0570261-012-AV

Dear Mr. Sheplak:

Hillsborough County is in receipt of Draft Permit No. 0570261-013-AC/PSD-FL-369C and 0570261-012-AV related to the Hillsborough County Resource Recovery Facility. CDM, on behalf of Hillsborough County, hereby provides the following comments on the Draft Permit for the Department's consideration:

- 1) The Facility Description on page 3 of 7 states an incorrect average heating value of 4,500 Btu/lb of refuse. Units 1, 2, and 3 were designed with an average heating value of 4,500 Btu/lb. Unit 4 was designed with an average heating value of 5,000 Btu/lb. The facility-wide pro-rated average heating value is 4,667 Btu/lb.
- 2) Specific Condition No. 35 has been modified to define "Hg CEMS Field Test and Success Criteria". The first of these criteria states that "the Hg CEMS shall accurately measure the Hg concentrations in the stack emissions". The phrase "accurately measure" is subjective and needs to be modified to provide a substantive quantification. We request that the Department modify this language to specify that the monitor must pass Relative Accuracy criteria defined in Section 3 of Performance Specification 12A entitled "Specifications and Test Procedures for Total Vapor Phase Mercury Continuous Emission Monitoring Systems in Stationary Sources" before declaring the field test successful.
- 3) We note in the associated Technical Evaluation and Preliminary Determination document that the Department "concurs with the idea behind a cost criterion" but has chosen not to include cost as a "success criteria" for the field test. Rather, the Department is requiring the compilation, tracking, and monthly reporting of





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operations & maintenance (O&M) man-hours dedicated to the Hg CEMS field test. If cost to Hillsborough County (both capital and O&M) is not a success criterion, then what value is there in the preparation and submittal of monthly reports related to cost?

It is important to reiterate that Hillsborough County and their contract operator, Covanta, have worked in good faith toward achieving the worthwhile goal of commissioning the first ever Hg CEMS on a municipal waste combustor in the United States. To that end, Hillsborough County voluntarily accepted a permit requirement to install an Hg CEMS in spite of the absence of any underlying regulatory requirement to do so, and Covanta has incurred significant expense as documented in their January 2011 Report entitled "Continuous Monitoring of Mercury Emissions at a Municipal Waste Combustor." Accordingly, we are dismayed that the Department has chosen to not include cost as a criterion to evaluate the overall success during the 1 year field demonstration as agreed to in principal during our meeting on April 6, 2011, and request that you reconsider the wording of Specific Condition No. 35 to include cost.

- 4) The revised permit continues to be silent with respect to the averaging time to be used on data collected by the Hg CEMS. The original Technical Evaluation and Preliminary Determination document associated with Permit No. PSD-FL-369 states: "To insure that PSD is not triggered, the Department will set an annual emission limit of 190 lb Hg/year to be monitored by use of a mercury CEMS." The same document goes on to state: "The required use of the Hg CEMS for the purpose of demonstrating annual emissions..." (emphasis ours). Because it is clear that the Department intended for the monitor to be used to demonstrate that PSD significance thresholds (in tons/yr) were not exceeded, we suggest that you modify the second paragraph of Specific Condition No. 19 to state that all valid data collected by the Hg CEMS shall be used to calculate the emission rate in tons/year.
- 5) The Hg monitor availability requirements added to Condition No. 34 appear to be reasonable, but until real life experience is gained during the 1 year field trial, it is impossible to predict how realistic it is to achieve these requirements. Hillsborough County is willing to accept aggressive monitor availability requirements, but questions the wisdom of assigning hard percentages (80% for 3rd year, 90% for 4th year, 95% goal thereafter) before obtaining the operational experience envisioned by the 1 year field test. For instance, a scenario could arise whereby the monitor achieves 75% availability during the 1-year field test (thus passing the success criteria), but is





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incapable of achieving any higher availability. Such a scenario would place Hillsborough County in non-compliance with the condition. When one considers that Hillsborough County voluntarily agreed to accept an Hg CEMS when there was no regulatory requirement for them to do so, it seems unreasonable for them to have to accept monitor availability requirements that have not been demonstrated to be achievable in the field.

We look forward to the Department's response.

Sincerely,

A handwritten signature in blue ink that reads "Wm. R. Crellin Jr., P.E.".

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)

